

# **Sunrise Wind - Appendix O: Responses to Comments on the Draft Environmental Impact Statement**

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## APPENDIX O: RESPONSES TO COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

### O.1. Introduction

On December 12, 2022, the Bureau of Ocean Energy Management (BOEM) published a notice of availability for the Sunrise Wind Project Draft Environmental Impact Statement (EIS), consistent with the regulations implementing the National Environmental Policy Act (NEPA; 42 USC 4321 et seq.) to assess the potential impacts of the Proposed Action and alternatives. The Draft EIS was made available in electronic form for public viewing at <https://www.boem.gov/renewable-energy/state-activities/sunrise-wind>, and hard copies and/or electronic copies were delivered to other entities as specified in Appendix N of the Draft EIS. The NEPA review process requires agencies to allow the public the opportunity to comment on a Draft EIS. The notice of availability initiated a 60-day public comment period for the Draft EIS. The comment period closed on February 14, 2023. This appendix describes the Draft EIS public comment processing methodology and definitions. It also includes responses to comments received on the Draft EIS and describes where specific updates to the Final EIS can be found in the document.

### O.2. Objective

BOEM reviewed and considered all written and oral public submissions received during the Draft EIS public review and comment period. BOEM's goal was to identify comments to be addressed in this Final EIS and to categorize those comments based on the applicable resource areas or NEPA topics. This categorization scheme allowed subject matter experts to review comments directly related to their areas of expertise and allowed BOEM to generate statistics based on the resource areas or NEPA topics addressed in each comment. All public comment submissions received can be viewed online at <http://www.regulations.gov> by typing "BOEM-2022-0071" in the search field.

### O.3. Methodology

#### O.3.1. Terminology

The following terminology is used throughout this appendix:

- **Submission:** The entire content submitted by a single person or group at a single time. For example, a 10-page letter from a citizen, an email with a portable document format (PDF) attachment, and a transcript of an oral comment given at a public hearing were each considered to be a submission.

- **Comment:** A specific statement within a submission that expresses a sender’s specific point of view, concern, question, or suggestion. A comment can consist of more than one sentence, as long as those grouped sentences express a single idea. One submission may contain many comments.
- **Substantive Comment:** Draft EIS submissions were reviewed to identify and categorize “substantive” comments. To be substantive, a comment must relate to the reasonably foreseeable impacts of the Proposed Action, alternatives, or cumulative actions and do one or more of the following:
  - Question (with supporting rationale) the accuracy of information in the Draft EIS;
  - Question (with supporting rationale) the adequacy of, methodology for, or assumptions used for the environmental analysis;
  - Present new information relevant to the analysis;
  - Present reasonable alternatives or mitigation measures other than those analyzed in the Draft EIS;
  - Present or cause modifications to alternatives or mitigation measures analyzed in the Draft EIS; or
  - Correct factual errors in the content of the Draft EIS.
- **General Comment:** General comments are comments other than substantive comments. General comments may:
  - Express interest or concern regarding an impact topic without providing specific comments on the information, methods, or findings presented in the Draft EIS;
  - Express general support for or opposition to the proposed Project; or
  - Comment on a topic unrelated to the proposed Project.

### **O.3.2. Comment Submittals**

Federal agencies, state/local/tribal governments, and the general public had the opportunity to provide comments on the Draft EIS via the following mechanisms:

- Electronic submissions via [www.regulations.gov](http://www.regulations.gov) on docket number BOEM-2022-0071;
- Hard-copy comment letters submitted to BOEM via traditional mail; and
- Comments submitted verbally at each of the public hearings.

BOEM held three online public hearings via Zoom to solicit verbal comments to inform the preparation of the Final EIS. The hearings were free and open to the public, with no registration required. The locations and dates of these hearings are outlined in Table O-1.

**Table O-1. Public Hearings**

Date	Time	Location
January 18, 2023	5:00 p.m. ET	Zoom Webinar
January 19, 2023	5:00 p.m. ET	Zoom Webinar
January 23, 2023	1:00 p.m. ET	Zoom Webinar

All submissions initially provided by methods other than [www.regulations.gov](http://www.regulations.gov), including the transcripts of comments recorded at each public hearing listed in Table O-1, were uploaded to the docket. Each submission, including testimony by individual speakers at the public hearings listed in Table O-1, was assigned a unique identification number. That unique Submission ID was retained throughout the comment management process for both submissions and the individual comments within those submissions.

### **O.3.3. Comment Processing**

BOEM downloaded and reviewed all submissions from [regulations.gov](http://regulations.gov). These submissions were provided in Hypertext Markup Language (HTML) format, while attachments provided by stakeholders as part of their [regulations.gov](http://regulations.gov) submission were typically provided in PDF or Microsoft Word format. Text from the HTML, as well as PDF, Word, and other text formats, were parsed, coded, and exported into a single Microsoft Excel file that served as the primary submission database. In cases where an attachment did not contain comments specific to the docket for the Sunrise Wind Draft EIS, the attachment was retained separately for BOEM reference as applicable and linked to the main body of the submission through the unique Submission ID. Examples of this type of attachment include copies of comment letters that were originally submitted during the scoping period, copies of comment letters that were originally submitted on another docket, or attached photos, published reports, news articles, or other secondary material. The submission database also included information about each submission, including the submitter’s contact information, submission date, and whether the submitter was a government entity or agency.

Each submission and all oral testimony were read to identify individual substantive and general comments (as defined under Section O.3.1., *Terminology*). Each comment was parsed, coded, and exported to a spreadsheet that served as the master comment database. Then, each comment received a unique comment ID number tied to the Submission ID. For example, the fourth comment in [regulations.gov](http://regulations.gov) submission 0001 was identified as BOEM-2022-0071-0001-0004.



Substantive comments from cooperating agencies and the Lessee were organized by agency or organization and presented verbatim in Sections O.4 and O.5. Other agency, stakeholder, and public comments were each assigned to one section of the Draft EIS, based on the document's table of contents, or to a general topic such as "NEPA/Public Involvement Process." Substantive and non-substantive comments from other agencies or stakeholders are presented verbatim in Section O.6. General comments are presented in Section O.7 and are categorized by opposition or support of the Project. General comments that were identical (or near identical) were grouped for a singular response, but submission IDs for each comment were retained.

Comments with foul language were not included in the comment database. No edits or grammatical corrections were made to the comments. All submissions are available for review at [www.regulations.gov](http://www.regulations.gov) under docket number BOEM-2022-0071. BOEM received a total of 284 individual comment submissions; commenter names, affiliations, and submission IDs are presented in Section O.8.

## O.4. Responses to Cooperating Agency Comments on the Draft EIS

### O.4.1. Cooperating Federal Agencies

#### O.4.1.1. National Oceanic and Atmospheric Administration, National Marine Fisheries Service

**Table O-2. Responses to Comments from National Oceanic and Atmospheric Administration, National Marine Fisheries Service [BOEM-2022-0071-0256]**

NMFS Comment	Response
<p>Environmentally Preferred Alternative We consider the Habitat Impact Minimization Alternative (Alternative C-2) to be the environmentally preferred alternative for the Sunrise Wind Project, as it would reduce impacts to Atlantic cod spawning habitat and other complex habitats found within the lease area, while still meeting the purpose and need of the project. In development of this alternative, NMFS identified priority areas based first on overlap with cod spawning activity, and then lease area overlap with complex habitats that are essential for cod and other demersal species. Large-scale offshore wind development on and adjacent to cod spawning activity and sensitive habitats on and around Cox Ledge remains a significant concern for our agency. Atlantic cod populations are in decline and significantly below target levels and the complex habitats used by this and other species are more vulnerable to long-term and permanent impacts from offshore wind development. Reducing impacts to these habitats will help minimize the risk of impacts on reproductive success of vulnerable cod populations, a species of biological, ecological, economic, and cultural significance to this region.</p>	<p>Thank you for your comment and support of Alternative C-2. This alternative is no longer technically feasible due to the discovery of glauconite sands in the Lease Area. United States Department of the Interior, Bureau of Ocean Energy Management (BOEM) has consulted with the National Oceanic and Atmospheric Administration (NOAA) and the National Marine Fisheries Service (NMFS) to develop Alternative C-3, which considers avoidance of Atlantic cod spawning areas and complex habitats.</p>

NMFS Comment	Response
<p>Minimizing overlap with complex habitats will also reduce the extent of long-term to permanent impacts on hard bottom complex habitats associated with Cox Ledge. In June 2022, the New England Fishery Management Council approved a new habitat area of particular concern (HAPC) that overlaps with the Sunrise Wind project area. This action highlights the importance of this complex habitat and cod spawning habitats and creates an obligation to evaluate whether offshore wind development would adversely impact such habitats and, if so, to consider measures which would minimize that negative effect. We recommend BOEM take measures to ensure offshore wind development avoids and minimizes impacts to these vulnerable habitats, including the HAPC.</p>	
<p>In addition to the selection of Alternative C-2, we have identified other ways that impacts to NOAA trust resources could be further reduced in the lease area. We recommend BOEM extend the Habitat Impact Minimization Alternative to consider the full range of the project’s Offshore Wind Renewable Energy Certificate Purchase and Sale Agreement (OREC). The DEIS does not consider additional turbine removal that would minimize habitat impact and still meet the OREC range of 880-924 MW, but rather focuses only on the maximum energy transmission in the COP of 1,034 MW. We recommend BOEM consider in the FEIS, as part of the Habitat Impact Minimization alternative, additional turbine removal and/or relocation that would meet the 880-924 MW range under the existing OREC, in addition to consideration of the 1,034 MW currently evaluated in the DEIS. The DEIS does not provide justification for excluding the consideration of an alternative that would meet the energy agreement under the</p>	<p>This alternative has been added under Alternative C-3 in the Final Environmental Impact Statement (EIS).</p>

NMFS Comment	Response
<p>OREC without pursuing excess capacity that would likely be associated with additional environmental impacts. We consider this a reasonable alternative that meets the purpose and need of the project and recommend it be evaluated as a means of further minimizing environmental impacts of the project.</p>	
<p>While the DEIS describes some distinction between the Habitat Impact Minimization Alternatives and the proposed action, the analysis does not fully describe the varying characteristics and habitats within the lease area. As a result, the impact analysis leads to the conclusion that there is limited distinction between the sub-alternatives (C-1 and C-2). The DEIS does not provide a full description of the lease area in the context of Southern New England and Cox Ledge, nor does it clearly describe the variations in habitats and resources within the lease area. Inclusion of both of these elements would allow BOEM to meaningfully and accurately distinguish impacts among the alternatives and sub-alternatives under consideration. The document should clarify where the lease area overlaps with cod spawning activity and complex habitat along the southern end of Cox Ledge. It should also discuss how habitat types differ within the lease area, including both within the priority areas, which are dominated by more complex and heterogeneous habitats, and the eastern portion of the lease, which is dominated by softer sediment and where relocation of 12 turbines is proposed. Currently, the DEIS appears to suggest all habitat types recover equally within a limited timeframe; however, this conclusion is not supported by the best available information, which indicates habitats of increasing complexity take measurably longer to recover. We</p>	<p>Thank you for your comment. Additional information has been added to the benthic and finfish sections that address your habitat concerns.</p>

NMFS Comment	Response
<p>recommend a thorough characterization of the lease area, including a more refined description of the diverse benthic habitat, be incorporated into the alternatives analysis in the FEIS. Additionally, we recommend that available figures (i.e., backscatter, boulder locations) be included to provide a clear distinction between the variation in habitat types and resources present in the lease area. This distinction should then be considered in the analysis of project impacts and comparison of alternatives.</p>	
<p>The analysis of Alternative C-2 outlines four WTG position configurations. While the Benthic Resources section of the DEIS refers to these configurations as Alternatives C-2a through C-2d, the DEIS does not analyze the layouts in any detail or identify them consistently as alternatives throughout all sections of the document. Based on how they are presented, we are interpreting these configurations as potential options for identifying turbines for relocation, rather than formal alternatives. While it is useful to consider various layout options, we do not recommend BOEM consider removing or relocating turbines based solely on boulder density, as suggested in the DEIS. Rather, we recommend BOEM consider the available cod spawning data to reduce overlap between turbine positions and spawning activity. We then recommend BOEM consider available habitat data to reduce overlap with complex habitats (e.g., cobbles, boulders) while also maintaining a continuous area that would be free from development to reduce overall impacts to these important habitat areas. Simply using boulder density as the metric for removal/relocation may not be fully protective of spawning activity or maintain continuous undisturbed areas of</p>	<p>Due to glauconite feasibility issues, Alternatives C-1 and C-2 are no longer feasible, and edits will not be made to the analysis or configuration of these alternatives. However, Alternative C-3 was developed, with NMFS input, based on habitat and Atlantic cod data. There are three sub-alternatives (Alternative C-3a, C-3b, and C-3c) put forward within the Final EIS that include the development of 80 wind turbine generators (WTGs), up to 84 WTGs, or up to 87 WTGs. Chapter 3 presents maps of benthic data, boulder density, and Atlantic cod data, all of which were considered in the development of Alternative C-3. When there are differences in impacts between these alternatives for a resource, they are analyzed separately within the resource section in Chapter 3. An example of no difference in impacts for these alternatives would be land use, since under these alternatives, no changes to land use would occur.</p>

NMFS Comment	Response
<p>complex habitats. We would be happy to work with you to help identify ways to further reduce impacts and we will also provide additional recommendations through our EFH consultation on this project.</p>	
<p>While additional text related to cod spawning activity was added to the DEIS, the full suite of potential impacts has not been analyzed and the DEIS does not consider the available data and information from studies conducted in the project area. These data should be used to identify areas of overlap between project activities and cod spawning and to develop appropriate mitigation measures. Additionally, the findings of the Atlantic Cod Stock Structure Working Group were recently published, and this information should be incorporated into the analysis in the FEIS. The DEIS suggests that a January through April pile driving time of year restriction designed to reduce impacts to North Atlantic right whales is protective of cod spawning. However, this statement does not reflect the most recent and best available scientific information which indicates that spawning in Southern New England waters is concentrated in November and December.</p>	<p>Available data has been added, including recent studies in the Project Area. Dean et al. (2020) described the Atlantic cod spawning period as occurring from November through March, with peak spawning from December through February. Langan et al. (2020) described Atlantic cod spawning as occurring from late December through mid-February based on the back-calculated growth rates of larvae collected in Narragansett Bay.</p>
<p>The DEIS's evaluation of impacts to cod spawning aggregations from construction activities outside of pile driving is also limited. There are multiple activities considered part of the seabed preparation process to clear the cobble/boulder habitats that would occur within known cod spawning aggregations; however, there is no analysis of impacts from seabed preparation on Atlantic cod spawning activity.</p>	<p>Text discussing the impact of seabed preparation on Atlantic cod has been added in Section 3.10.5.1.2.</p>
<p>Additionally, the DEIS does not discuss the proximity of the offshore converter station, and associated open loop cooling system, to cod spawning activity or potential impacts to eggs</p>	<p>The text was updated in Section 3.10.5.2.2, <i>Offshore Activities and Facilities, Entrainment</i>, to include all the mitigation measures proposed to minimize potential impacts to Atlantic cod.</p>

NMFS Comment	Response
<p>and larvae from project operation. The DEIS should identify, describe, and evaluate a full range of mitigation measures to protect (i.e., avoid or minimize disturbance of) cod spawning activity in this area. The Atlantic Cod Stock Structure Working Group identified five biological stocks in U.S. Waters, which includes a Southern New England stock. It will be important for BOEM to fully analyze impacts of this project on Southern New England cod and evaluate measures that could be undertaken to avoid and minimize those impacts.</p>	
<p>Outside the Habitat Impact Minimization Alternative, the DEIS does not identify any mitigation measures to protect this vulnerable life history stage. We recommend the FEIS evaluate additional mitigation measures, including time of year restrictions for construction activities, to avoid impacting Atlantic cod spawning activity. Given the vulnerability of this population, we are concerned the project, as proposed, will result in adverse population level effects (major adverse impacts) on cod populations in Southern New England if appropriate avoidance and minimization measures are not incorporated.</p>	<p>At this time, BOEM is not considering any time-of-year restrictions for non-listed species. However, the North Atlantic right whale (NARW; an ESA-listed species) time-of-year restrictions would overlap with most Atlantic cod spawning timing and could serve to reduce impacts. In addition, Appendix H (Tables H-2, H-3, and H-4) includes mitigation measures that could be imposed on the developer to reduce impacts during construction, operations and maintenance (O&amp;M), and decommissioning.</p>
<p>Support for conclusions - We recommend BOEM thoroughly review the rationale for each impact level conclusion to ensure conclusions are fully supported by the text and the best available information. Impact determination should also be consistent with the definition of the impact conclusion. For example, many impacts are considered negligible despite the text providing supporting rationale for measurable project impacts.</p>	<p>Thank you for your comment. Impact-level conclusions are supported throughout the text, and the best available information is used.</p>

NMFS Comment	Response
<p>Missing analyses - There continue to be important analyses and conclusions that are absent from the DEIS. We continue to encourage BOEM to include an analysis of impacts to shoreside support services and fishing communities due to changes to fishing operations resulting from the proposed action. Additionally, there is no analysis on the potential impacts from wind wake effects or invasive species colonization; invasives are only discussed in the context of ballast water.</p>	<p>The importance of the commercial fishing industry to shoreside services and industries is acknowledged, as there are a variety of ports and shoreside businesses within this area. To that end, the analysis includes an extensive analysis of commercial fishing revenue exposure within the Lease Area. In addition, for the Final EIS, two additional tables have been included to outline and present revenue exposure by both Port and State to better articulate the potential impacts related to the Proposed Action.</p> <p>Invasive species are discussed in the finfish and benthic sections, and analysis has been expanded beyond just ballast water.</p> <p>Potential impacts caused by wind wakes are included in the finfish section of the EIS in Section 3.10.5.2.2, <i>Offshore Activities and Facilities, Presence of Structures</i>.</p>
<p>Document inconsistencies - The level of analysis by project area and resources is inconsistent throughout the document. Some sections have more thorough evaluations, but those analyses do not always align with the impact conclusion; while other sections are much more limited in the analysis of potential project impacts. All anticipated impact producing factors (IPFs) should be fully analyzed for each resource area. Inconsistencies between information in the DEIS and the MMPA application provided by Sunrise Wind to NMFS remain and should be resolved in the FEIS.</p>	<p>The overall document has been revised to improve consistency and include impact-level determinations for each section. It is reasonable to base the level of analysis on the combination of the likelihood of an impact occurring and the relative potential for harm from that impact.</p>
<p>Mitigation measures - We recommend the FEIS analyze and describe the anticipated impacts of the proposed action, mitigation measures considered to be part of that action, the effectiveness of these measures, the expected impacts if mitigation methods are applied, as well as the likelihood that such measures will be required and implemented. This structure is important to clarify the final impact</p>	<p>In the Final EIS, a mitigation and monitoring section has been added to the end of each section. All APMs are considered part of the Proposed Action. Additional mitigation measures are listed at the end of each section and within Appendix H (Tables H-2, H-3, and H-4) that would be considered for implementation if the Project is approved.</p>



NMFS Comment	Response
<p>determinations. While Appendix H lists possible additional mitigation measures, these measures are not all analyzed in the DEIS. The DEIS still contains sections where BOEM is relying on mitigation measures to reduce impacts, but does not specify which of these measures, if any, are factored into the impact determination. In addition, assumptions about the success of mitigation measures are made despite a lack of evidence or adequate detail regarding specific mitigation measures (i.e., fisheries and resource survey impact mitigation).</p>	
<p>Significance Criteria - The significance criteria for some resources, in combination with the defined area of analysis for each resource, do not fully consider variations in the intensity or scale of impacts and how these factors may affect resources at the project, regional, or population levels. The importance of the seasonal timing or temporal duration of impacts to resources is not clearly explained through the significance criteria or applied to the analysis. In these instances, the analyses do not provide a clear picture of what the effects of those spatial impacts and temporal losses mean for NOAA trust resources and the communities that rely on them. Consideration of both the scale and intensity of impacts in the definition and application of the significance criteria would allow for accurate impact conclusions and provide clear distinctions among action alternatives.</p>	<p>The rationale for the geographic extent of the analysis area for each resource is explained in the introduction to each Chapter 3 resource section. In general, resources with more localized impacts (i.e., benthic resources) have a smaller geographic analysis area (GAA), while the GAA for species that are highly mobile (i.e., marine mammals, sea turtles, and finfish) is broader to include the movement range of species that could be affected. Final EIS Section 3.2 defines the terminology used throughout the Final EIS to characterize the duration of impacts as short-term (effects that may extend up to 3 years), long-term (effects that may extend between 3 years and 35 years or the life of the Project), or permanent (effects that extend beyond the life of the Project). BOEM uses a four-level classification scheme to characterize the potential impacts of the alternatives. Resource-specific impact level definitions are presented in each resource section, and the impacts of each alternative align with the appropriate impact level, as supported by the analysis.</p>
<p>Geographic analysis area - Overall, the DEIS does not appear to capture what the effect of the project will be on resources within the Southern New England region, including project-specific and cumulative effects to Cox Ledge. The DEIS should analyze project impacts within the bounds of an appropriate</p>	<p>The GAA is defined by the anticipated geographic extent of impacts for each resource. For the mobile resources—bats, birds, finfish and invertebrates, marine mammals, and sea turtles—the species potentially affected are those that occur within the area of impact of the Proposed Action. The GAA for these mobile resources is the general range of the species that could</p>

NMFS Comment	Response
<p>geographic scale to allow for a meaningful understanding of effects to each resource from IPFs of the project. A geographic analysis area that is too broad may not predict the direct and indirect effects of the proposed action on a finer scale defined by the IPF.</p>	<p>traverse the Project footprint. The purpose is to capture the cumulative impacts on each of those resources and the entire populations that could be affected by the Proposed Action, as well as the impacts that would still occur under the No Action Alternative. Impacts from the Proposed Action impact-producing factors (IPFs) and cumulative activities are evaluated using the significance criteria defined in Section 3.3, which consider the potential for population-level impacts. Where applicable, the Final EIS discloses localized impacts (e.g., to Cox Ledge) from IPFs; however, those impacts are also evaluated in the context of the broader resource extent within the GAA.</p>
<p>Cumulative Analysis - The cumulative analysis in the DEIS is very general and does not provide a meaningful analysis of how this project, in combination with adjacent projects in development and proposed on Cox Ledge, will impact the resources in Southern New England. While the cumulative analysis includes areas beyond Southern New England, the effects to this specific region from large scale development are not analyzed in the document— a gap which should be addressed in each offshore wind project’s EIS.</p>	<p>Thank you for your comment. The cumulative sections have been expanded and analyzed with more detail within the Final EIS.</p>
<p>NOAA Scientific Surveys - We continue to have significant concerns related to the major impacts offshore wind development will have on our NOAA scientific surveys. The DEIS does not include any discussion on how these major impacts will be mitigated at the project level other than referencing the ongoing BOEM/NMFS survey mitigation efforts. However, the mitigation strategy is not currently resourced and does not set requirements or standards with which projects must comply. In order to minimize the major adverse impacts expected on scientific surveys, we recommend mitigation measures be required and implemented before development moves forward, consistent</p>	<p>Thank you for your comment. BOEM will continue to work with NOAA regarding mitigation measures for this Project.</p>

NMFS Comment	Response
<p>with our joint survey mitigation efforts. We will continue to work with you to ensure these details can be included in the FEIS.</p>	
<p>The table reads that impacts described do not include mitigation measures despite mitigation measures being included in the COP, but NMFS understands that the impacts in the analysis in Chapter 3 incorporate mitigation. Please edit the table title accordingly. If impacts do not incorporate mitigation, this approach is inconsistent with other OSW EISs.</p>	<p>The text has been updated; mitigation measures are included in the analysis.</p>
<p>Please edit the sixth paragraph in this section to reflect the following agreed upon language, "In addition, the National Oceanic and Atmospheric Administration’s (NOAA) National Marine Fisheries Service (NMFS) anticipates one or more requests for authorization under the Marine Mammal Protection Act (MMPA) to take marine mammals incidental to construction activities related to the Project. NMFS’ issuance of an MMPA incidental take authorization would be a major Federal action connected to BOEM’s action (40 CFR 1501.9(e)(1)). The purpose of the NMFS action—which is a direct outcome of Sunrise Wind’s request for authorization to take marine mammals incidental to specified activities associated with the Project (e.g., pile driving)—is to evaluate Sunrise Wind’s request pursuant to specific requirements of the MMPA and its implementing regulations administered by NMFS, considering impacts of the applicant’s activities on relevant resources, and if appropriate, issue the permit or authorization. NMFS needs to render a decision regarding the request for authorization due to NMFS’ responsibilities under the MMPA (16 U.S.C. 1371(a)(5)(A) &amp; (D)) and its implementing regulations. If NMFS makes the findings</p>	<p>The text has been updated as suggested.</p>

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<p>necessary to issue the requested authorization, NMFS intends to adopt, after independent review, BOEM's environmental impact statement (EIS) to support that decision and fulfill its National Environmental Policy Act (NEPA) requirements."</p>	
<p>Please include a short explanation at the end of the paragraph about whether the list of activities in Appendix E has been developed for this specific project, or whether this same list of activities was developed for and is being included for all OWS projects in the Atlantic, regardless of project location, scale or details. Please also see related comment in Appendix E. This issue has also been identified by NMFS in CVOW, Ocean, Empire, and Mayflower.</p>	<p>The list of activities in Appendix E has been updated specifically for the Sunrise Wind Project.</p>
<p>The purpose and need states that the project's agreement with NYSERDA is to deliver 880 MW with the ability to deliver up to 924 MW, but all presented alternatives rely on meeting a maximum output of 1034 MW. The document only includes consideration of the installation of 94 turbines for a total generation of 1034 MW. However, approximately 80 to 84 turbine locations would be necessary to meet the existing agreement of 880 MW to a maximum of 924 MW, which could presumably reduce impacts to resources in the lease area. The document does not provide any justification as to why an alternative meeting the OREC of 880 - 924MW, without additional excess capacity, would not be reasonable. We continue to recommend that the document consider additional alternatives designed to further reduce impacts to sensitive habitats in the project area (i.e., Atlantic cod spawning habitats and complex habitats associated with Cox Ledge) using layouts that would still meet the applicant's agreements.</p>	<p>Alternative C-3 has been added and considers fewer WTG positions.</p>

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<p>Please add the following sentence to the end of the paragraph: "If a mitigation measure was analyzed in the impacts analysis for the selected alternative and that measure influenced the impact determination for a particular resource, that measure will be included as a term and condition." Any mitigation and monitoring terms that influence the impact conclusions need to be committed measures in order for the assumptions and conclusions of the analysis to be accurate.</p>	<p>Text has been added to Section 3.2.</p>
<p>This section describes the project area as "generally homogeneous sandy/soft substrate typical of the region". However, this project overlaps with the south end of Cox Ledge and includes complex habitat throughout the lease. When describing the region, this section should also discuss the complex habitats and benthic features in Southern New England, including Cox Ledge so the reader can have an accurate understanding of the benthos in and around project area.</p>	<p>Please see Figure 2.1-6, which displays the location of Cox Ledge in relation to the Sunrise Wind Farm (SRWF). Surveys have determined that Cox Ledge is approximately 5 to 10 kilometers (km; 3.1 to 6.2 miles[mi]) north of Priority Area 1, which is the area closest to the ledge terminus. Each portion of the benthic habitat surveyed is described in greater detail in Sections 3.7.1.1 through 3.7.1.7. Table 3.7-1 summarizes the sampling results, including dominant substrate and common taxa observed to further characterize the types of habitats surveyed within each Project component area.</p>
<p>Under presence of structures, it would be useful to discuss how the hydrodynamics in Southern New England may be affected by the presence of structures, including tidal fronts in SNE (e.g. Nantucket Shoals). This section should also include an analysis of impacts from invasive species colonization and changes to the surrounding benthos (i.e. increased in organics) as a result of the presences of structures. These analyses are missing from the DEIS and we recommend they be included in the FEIS.</p>	<p>Thank you for your comment. Information on the influence of wind turbines/structures on the hydrodynamic conditions within an offshore wind farm is included in Section 3.5.5.2, <i>Water Quality</i>, and has been added to 3.10.5.2, <i>Finfish, Invertebrates, and Essential Fish Habitat</i>, and Section 3.11.5.2, <i>Marine Mammals</i>. Further discussion on invasive species is provided in Section 3.7.5.2.2 of <i>Benthic Resources</i> and Section 3.10.5.1.2 of <i>Finfish, Invertebrates, and Essential Fish Habitat</i>.</p>
<p>Under the noise section, there are several statements related to the duration of impacts that are unsupported. For example, it states that noise from pile-driving that causes behavioral changes could affect the same populations or individuals</p>	<p>Noise levels (calculated by NMFS's <i>Multi-Species Pile-Driving Calculator Tool</i>) and the criteria for sensitive fish species were used for this EIS. An individual may be affected multiple times during the installation of a WTG or during a maintenance activity. The impacts are expected to be minor to moderate</p>

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multiple times in a year or in sequential years, but then concludes the impacts would be minor. Please clarify how the impact level determination was made.	because the noise and vibration would dissipate rapidly in the soft sediments. The text was revised in Section 3.7.3 as there was an error.
This section only appears to discuss invasives in terms of ballast water. However, habitat disturbance, particularly disturbance of natural hard bottom, and the presence of new structures can also lead to colonization by invasives. We recommend this be discussed and analyzed.	Updated information was added under Sections 3.7.3 and 3.7.5.
We recommend including a project schedule in this section with a discussion of how benthic resources may be affected based on the time of year the activity is occurring.	The Project schedule is included in Chapter 2. The effects due to the timing of activities were discussed in Section 3.7.5.
Under noise and vibration, there are no supporting citations from literature (grey or peer-reviewed) to support any of the statements made. The analysis should include a discussion of both sound pressure and particle motion as well as substrate vibration in relation to pile driving.	Thank you for your comment. The numbers provided were from NMFS's <i>Multi-Species Pile Driving Calculator Tool</i> . However, since the Draft EIS, several citations have been added to support the analysis.
The following statement should be clarified, "Since the ICW is dredged periodically to facilitate vessel traffic, the level of disturbance from the HDD would be negligible in comparison". This section should evaluate the activities and effects from this project consistent with impact level definitions, rather than making conclusions based on comparisons with other activities.	The channel is dredged periodically to accommodate vessel passage, which means it is disturbed to a greater degree than the actions proposed by the Project, which would use subsurface directional drilling. Therefore, the comparison attempts to place the Proposed Action in the context of other ongoing activities with known effects on the site. Explanatory text was added to Section 3.7.5.1.1.
Please provide an analysis of the effects of leveling sand ripples.	Discussion of the effects of sand wave leveling in Section 3.7.5 includes direct adverse impact information.
The following statement should be deleted: "On request from NOAA Habitat, sand and mud habitats with boulder fields that were previously cross walked to the "heterogeneous complex"	Each portion of the benthic habitats surveyed is described in greater detail in Sections 3.7.1.1 through 3.7.1.7. Table 3.7-1 summarizes the sampling results, including dominant substrate and common taxa observed, to further

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category, were cross walked to “complex.” The document should clearly describe the habitats in the project area, based on both the broader mapping categories and the samples.	characterize the types of habitats surveyed within each Project component area. This statement relates to how the habitats were classified to facilitate impact estimation and comparing areas of priority habitats based on the level of complexity. The survey results are also included in Sections 3.7.1.1 to 3.7.1.7.
Relocating boulders would be a permanent change to benthic habitat. The potential effects of this should be analyzed in detail. Please clarify whether there are plans to create boulder aggregations. If the creation of boulder aggregations is planned, there should be an in-depth consideration of the potential effects.	Sunrise Wind plans to relocate boulders in a specific sub-area of the 220-meter (m; 722-feet [ft]) radius. The decision to move boulders was made after conducting pre-construction surveys at the site that provided information on the relevant area for installation and operation. Boulders up to approximately 2.4 m (7.9 ft) in diameter would be moved using a boulder grab. The goal would be to move boulders as little as possible, and there is currently no plan to create boulder aggregations. (January 2023 Boulder Relocation Plan- Sunrise Wind 2023a).
Please provide a citation for the following sentence: “Other species that may benefit from the increased hard substrate, which would exhibit zonation with depth, include sea anemones and other anthozoans, bivalves such as horse mussel ( <i>Modiolus modiolus</i> ) and blue mussel ( <i>Mytilus edulis</i> ), green sea urchin ( <i>Strongylocentrotus droebachiensis</i> ), barnacles, hydrozoans, sponges, and other fouling organisms.”	Degraer et al. (2020) was cited.
Please provide a citation for the following sentence: “Similar effects have been seen at offshore oil rigs where ocean communities develop and resemble those found at natural and artificial reef structures.”	Hutchison et al. (2020b) was cited.
The text appears to suggest the WTG foundations are analogous to the existing complex habitats. This is based on an assumption that the rock used for scour protection is equivalent to natural, complex rocky bottom habitat, which generally is not true. Riprap typically used for scour protection	Additional text was added citing Chen et al. (2023) and Hutchison et al. (2020b) on the Block Island Wind Farm (BIWF) findings.

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<p>is angular, engineered stone of large diameter that is not the same as small diameter cobble, gravel and rocky bottom habitats. In addition, engineered, artificial rock is known to attract greater amounts of invasive species, including tunicates, sponges, and macroalgae. While it's important to discuss the colonization of structures, this section should not suggest the habitat value is equal to the existing habitats, as this is unsupported.</p>	
<p>Under discharge and releases, the conclusion on impacts of the OSC-DC is unsupported. Please provide additional text and references to support any conclusions on impact determinations.</p>	<p>Additional text was added to support the conclusion.</p>
<p>In the conclusion regarding the impacts of the proposed action, please include a discussion of the permanent habitat conversion brought about by relocating boulders.</p>	<p>Information on how the habitat would be altered if boulders were relocated was added to Section 3.7.5.1.2.</p>
<p>It is unclear what geographic area and benthic resources you are considering when evaluating impacts of the specific project. There is limited discussion of the benthic resources in and around this area. Much of the discussion is in general terms, making it difficult to understand how this project may affect benthic resources in the project area and in and around Cox Ledge.</p>	<p>The benthic resources description is from the surveys that have been completed. Further information was added throughout Section 3.7, <i>Benthic Resources</i>.</p>
<p>We have concerns with how the DEIS is characterizing the Habitat Impact Minimization alternative and NMFS participation in assisting BOEM with scoping out this alternative; we recommend you provide clarifications in the DEIS. It is inaccurate to suggest that NMFS identified priority areas based on backscatter alone. The priority areas were identified by first prioritizing areas that overlap with</p>	<p>Text was added to Section 3.7.6 to clarify how priority areas were identified. Alternatives C-1 and C-2 are no longer feasible; however, Alternative C-3 was added, and consultation with NMFS occurred to help identify the WTG positions for exclusion.</p>



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<p>documented cod spawning activity, then areas that overlap with complex habitats, which were identified based on all available habitat data, including backscatter, identified boulders, and benthic samples. We recommend this alternative focus first on reducing impacts in priority area 1 and then area 2. This would reduce overlap with cod spawning activity and complex habitats, while also maintaining a continuous area free of development in these sensitive habitat areas to reduce habitat fragmentation.</p>	
<p>The conclusion that there would be no permanent impacts to benthic resources from the project is unsupported. The existing landscape and associated benthic resources will be permanently changed by project construction and operation, beyond the life of the project, even if there are some areas of recovery (i.e., infauna).</p>	<p>The statement that no impacts would be permanent is not in the Benthic Resources section. In fact, several IPFs are noted as being permanently impacted, such as the presence of structures.</p>
<p>We recommend you include figures of the habitat data, including backscatter and boulders, to help the reader better understand benthic resources in each project section.</p>	<p>Additional figures were added to Section 3.7.1 (see Figures 3.7-1, 3.7-2, and 3.7-3).</p>
<p>In Table 3.5.2-2 (Definition of Potential Impact Levels for Benthic Resources), it appears both moderate and major adverse may have population level effects; however, moderate are considered recoverable. It's unclear what you are considering "recoverable", and what time frame for recovery is considered here. It would be beneficial if the definitions incorporated the scale and intensity of impact to allow for a more clear distinction among the impact level definitions.</p>	<p>Section 3.7.2 (previously Section 3.5.2.2 in the Draft EIS) has a narrative explanation of the terms "recoverable" and "non-recoverable" that cites Popper et al. (2014).</p>
<p>Please provide support for the impact determination made throughout this section. Many impacts are dismissed as</p>	<p>Supporting information was added in the impact sections.</p>

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<p>negligible, despite text suggesting measurable effects. For example, under operational noise and EMF, the section discusses impacts for the life of project but then concludes the impacts are negligible; this is unsupported by the text and in some cases contrary to text provided.</p>	
<p>This section discusses impacts to SAV; however, the anticipated impacts and extent of area to be impacted are unclear from the description. It is our understanding that this temporary structure is not proposed in the SAV, but that is unclear from the description in the DEIS. If impacts to SAV are anticipated, then mitigation should also be described.</p>	<p>The Final EIS characterized the eelgrass as potentially occurring in the Project Area and noted that it was found in 2018 but has not been confirmed in a more recent survey (2022). As described in Appendix H, Sunrise Wind would provide locations of identified submerged aquatic vegetation (SAV) to contractors so they can avoid anchoring/spudding impacts to SAV. Additionally, numerous mitigations were proposed as part of the essential fish habitat (EFH) consultation with NMFS to protect SAV habitat. See Appendix H for more details on SAV mitigation and monitoring.</p>
<p>Page 3-103 includes a statement recognizing that "In areas with cobble and boulder habitat, the benthic organisms are not well adapted to frequent sedimentation and, therefore, may take longer to recolonize after the disturbance." However, throughout this section of the DEIS, the document suggests recovery will be short term, often suggesting 1-3 years for recovery. It should be noted that more complex habitats have much slower recovery times. Since the project area is not comprised of all the same habitat types, recovery times will vary; but this is unclear in the analysis. Additionally, the DEIS suggests that benthic resources would recover in 1-3 years after decommissioning of the project with a 30-35 year life span. Please provide support for this conclusion.</p>	<p>The 1- to 3-year recovery time is stated for soft sediment areas, not for all habitat types. The text was revised to reflect this more clearly.</p>
<p>Please include more information on EMF effects on blue mussels including Albert et al. 2022 (doi.org/10.1007/s00227-022-04065-4); Jakubowska-Lehrmann et al. 2022 (doi.org/10.1016/j.marenvres.2022.105700)/</p>	<p>The Jakubowska-Lehrmann paper has a good literature review on blue mussels, but the levels of exposure were very high and not comparable to in-situ conditions. The Albert paper also used similar high exposure levels and found no effects.</p>

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<p>This section identifies four WTG configurations which are being labeled Alternatives C-2a, C-2b, C-2c, and C-2d. However, these are not identified as alternatives in section 2.1, nor are they fully or consistently analyzed throughout this and other sections of the document. In the Benthic Resources section, no substantive analysis is done to explain the potential difference between configurations on resources, so it is unclear how different layouts may change impacts. Our understanding is that these are not formal alternatives, but rather example layouts for alternative C-2. Please ensure these are clearly and consistently described and analyzed. We would also note that these sub-alternatives identified do not consider the concerns raised by NMFS in the scoping of the Habitat Impact Minimization Alternative. These sub alternatives focus solely on boulder density, and do not consider removal of all locations that overlap with documented cod spawning activity. We recommend BOEM prioritize removal and relocation of turbines that overlap with documented cod spawning activity, then complex habitat areas in a manner that would provide continuous undisturbed areas, and minimize habitat fragmentation. We do not recommend identifying areas simply based on boulder density alone.</p>	<p>As requested by NMFS, BOEM let the analysis within the EIS determine the most appropriate layout. Due to glauconite feasibility issues, Alternatives C-2a, C-2b, C-2c, and C-2d are no longer valid, so re-analysis was not included in the Final EIS. However, Alternative C-3 considers Atlantic cod data, complex habitat, and boulder density to determine the contiguous habitat for WTG removal.</p>
<p>The "Comparison of Alternatives" sections throughout the document (such as in 3.5.2.8) only include the three action alternatives. These sections seem intended to provide overall conclusion summaries and comparisons of cumulative effects, but do not include the No Action alternative for a full comparison of overall impacts. Please include the No Action alternative for a clearer comparison. Additionally, as described</p>	<p>The No Action Alternative (Alternative A) is now included in the comparison of cumulative effects.</p>

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<p>in a previous comment, four layouts described as "alternatives" are also provided under alternative C-2, but these do not have their own impact conclusions nor are they summarized in this table. Please ensure consistency in identification of alternatives.</p>	
<p>We recommend this section consider impacts in the context of habitat and benthic resources present in the project area. Much of the Benthic Resources section focuses the analysis in general terms, making it challenging to clearly distinguish between alternatives, without a more detailed description of how benthic resources within the project area differ. Incorporating additional figures such as backscatter and boulder density may also be useful so the reader has a clearer understanding of the characteristics of the project area.</p>	<p>Additional figures were added to Section 3.7.1 (see Figures 3.7-1, 3.7-2, and 3.7-3).</p>
<p>Page 3-202 appears to mischaracterize the recent action by the NEFMC and these statements should be corrected in the FEIS. The NEFMC approved an HAPC that is focused on protecting two elements - 1) complex habitats; and 2) cod spawning activity - from the anthropogenic pressure and development in Southern New England, specifically offshore wind development. To be considered for an HAPC designation, the 2002 EFH regulations (50 CFR Part 600.815(a)(8)(i)-(iv)) requires one or more of the following four criteria to be met: 1) importance of historic or current ecological function for managed species; 2) sensitivity to anthropogenic stresses; 3) extent of current or future development stresses; and/or 4) rarity of the habitat type. As described in detail in the NEFMC's Draft Submission to us dated August 22, 2022, the Council's approved HAPC meets all four of these criteria for the designation of an HAPC for Atlantic cod spawning activity and</p>	<p>The text was updated to better characterize recent actions by the New England Fishery Management Council (NEFMC) in Section 3.10.1, <i>Description of the Affected Environment and Future Baseline Conditions</i>.</p>

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<p>three of the criteria for the designation of an HAPC for complex habitat. BOEM's description of the HAPC is incorrect, as it is conflating the complex habitat portion of the HAPC with cod spawning activity. The Council's approved HAPC applies to any area where cod spawning activity is identified (based upon specified criteria) regardless of the habitat type where spawning occurs. This is particularly important to clarify as cod spawn over a variety of habitat types and use different habitat types within aggregation areas. Please revise your presentation of this Council approved to correctly describe and characterize the new HAPC.</p>	
<p>The following statement should be deleted, "Ongoing fishing pressures would exacerbate the impacts to fish, invertebrates, and EFH more so than construction related activities". This statement is unsupported by the text and it appears to be making an unreasonable comparison. Impacts of the proposed project construction and operation are not the same as fishing activity it is inappropriate to equate these two activities. A fisheries management process exists to address impacts to finfish, invertebrates and EFH from fishing activity.</p>	<p>The statement was deleted.</p>
<p>For anchoring, there is no supporting peer-reviewed or gray literature cited. Please provide appropriate citations.</p>	<p>Citations were included in Section 3.10.3.2, 3.10.5.1.2, and 3.10.5.2.2. Appendix K of the Final EIS includes a list of all references.</p>
<p>Please define which species are being referred to in the following sentence: "In reality, fish would be moving around, which could, for some species, lessen the impact during pile driving, which would only occur for an approximately 4-hr period each day."</p>	<p>In the context of the paragraph that discusses injury thresholds for pile driving, it is stated that the thresholds assume the fish are stationary when they actually move around. These would be exposed mobile species.</p>
<p>Please provide a citation for the following statement, "However, acoustic masking is an environmental stressor that</p>	<p>Confluence (Confluence Environmental Company). 2023. Revolution Wind Farm and Revolution Wind Export Cable – Development and Operation.</p>

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<p>ceases as soon as the noise stops, with no lingering effects.”</p>	<p>Essential Fish Habitat Assessment. Prepared for BOEM, Washington, D.C., by Confluence, Seattle, Washington. The in-text citation was added.</p>
<p>Please provide the scientific basis for the following statement given that earlier in this section (pg. 347), it is stated that cod have high spawning site fidelity: “Given the availability of similar surrounding habitat, Project activities are not expected to result in measurable impacts on spawning Atlantic cod.” The top of that same paragraph states “Specifically, seafloor-disturbing activities could result in a loss of spawning habitat for Atlantic cod, as studies suggest that cod often demonstrate spawning site fidelity, returning to the same fine-scale bathymetric locations year after year to spawn (Hernandez et al. 2013; Siceloff and Howell 2013).” The conclusion is inconsistent with the information provided in the paragraph.</p>	<p>This sentence was deleted.</p>
<p>Relocating boulders would be a permanent change to benthic habitat. The potential effects of this should be analyzed in detail. The following sentence refers to boulder aggregations. Please clarify whether there are plans to create boulder aggregations. "Additionally, if relocation results in aggregations of boulders, these new features could serve as high value refuge habitat for juvenile lobster and fish that prefer structured habitat, as they may provide more complexity and opportunity for refuge than surrounding patchy habitat." If the creation of boulder aggregations is planned, there should be an in-depth consideration of the potential effects.</p>	<p>Since the Draft EIS was published, the Boulder Relocation Plan from Sunrise Wind was developed. No boulder aggregations are planned, although boulders will be moved as little as possible, which could result in boulders being placed near each other.</p>
<p>The conclusion that impacts to EFH from boulder clearance will be low is unsupported. Specifically, the paragraph that suggests hard bottom areas would rapidly recolonize and recover is not supported by the best available information.</p>	<p>The suggested literature was reviewed, and conclusions were adjusted.</p>

NMFS Comment	Response
<p>Below are some additional references to consider in your evaluation. Tamsett, A., Heinonen, K., Auster, P., and Lindholm, J. (2010). Dynamics of hard substratum communities inside and outside of a fisheries habitat closed area in Stellwagen Bank National Marine Sanctuary (Gulf of Maine, NW Atlantic). Auster, P. J., &amp; Langton, R. W. (1999). The effects of fishing on fish habitat. In American Fisheries Society Symposium (Vol. 22, No. 150-187). Lindholm, J. B., Auster, P. J., &amp; Kaufman, L. S. (1999). Habitat-mediated survivorship of juvenile (0-year) Atlantic cod <i>Gadus morhua</i>. Marine Ecology Progress Series, 180, 247-255. Auster, P. J., Malatesta, R. J., Langton, R. W., Watting, L., Valentine, P. C., Donaldson, C. L. S., ... &amp; Babb, W. G. (1996). The impacts of mobile fishing gear on seafloor habitats in the Gulf of Maine (Northwest Atlantic): implications for conservation of fish populations. Reviews in fisheries Science, 4(2), 185-202. Lengyel, N. L., Collie, J. S., &amp; Valentine, P. C. (2009). The invasive colonial ascidian <i>Didemnum vexillum</i> on Georges Bank- Ecological effects and genetic identification. Aquatic Invasions, 4(1), 143-152.</p>	
<p>When discussing sand wave leveling, we recommend this section also discuss and evaluate dredging methods proposed and plans for dredge material disposal. Currently, the document provides limited analysis on the extent of dredging proposed or potential impacts to finfish, invertebrates, and EFH.</p>	<p>Thank you for your comment. More information about dredging and dredging effects on aquatic organisms is included in the Final EIS in Section 3.10.5.1.2 (previously Section 3.5.5.1.2 in the Draft EIS).</p>
<p>This analysis of the artificial reef effect should include a discussion of FAD (fish aggregating device) effects; artificial reef effects; modification of the prey field for upper level predators, the potential for structures to facilitate the</p>	<p>Thank you for your comment. More information about the effects of artificial reefs on aquatic organisms is included in the Final EIS in Section 3.10.5.2.2.</p>

NMFS Comment	Response
<p>establishment and range expansion of non-native species. The analysis of the artificial reef effect cites only 2 peer-reviewed papers. Please provide appropriate citations to support statements made in this section. There is a growing body of knowledge on these topics and the majority of this information is missing from the analysis.</p>	
<p>Please provide citations for the following statement: “It has been shown in recent studies that offshore wind structures can increase the amount of habitat for invertebrates that colonize hard structure or complex benthic habitats.”</p>	<p>Hutchison ZM, Bartley S, Degraer P, English A, Khan J, Livermore B, King JM. 2020a. Offshore wind energy and benthic habitat changes, lessons from Block Island Wind Farm. <i>Oceanography</i> 33(4):58-69. The in-text citation was added.</p>
<p>Please place the following sentence into the context of the Sunrise project: “There was a shift in community structure from aggregations of mussels and barnacles to more dense colonization by corals, hydroids, anemones, crabs, sea stars, and snails. (Causon and Gill 2018).”</p>	<p>Studies from the Block Island Wind Farm reported an increase in mussel beds, tunicate, and indigenous coral. This was followed by an increase in the number of abundant predators associated with the mussel communities, including moon snails, crabs, and sea stars (Hutchison et al. 2020a). The BIWF is in close proximity to SRWF, so similar changes could be expected.</p>
<p>Please define what is meant by “vulnerable species”.</p>	<p>In the context in which it was used, vulnerable species are those that can be caught by sampling gear such as trawls, traps, and nets. The text was updated to reflect this more clearly.</p>
<p>Please provide more details on the “least squares fit” that was conducted using the data from Tougaard et al. 2020.</p>	<p>Least squares fit is a mathematical procedure for finding the best-fitting curve to a given set of points by minimizing the sum of the squares of the offsets (“the residuals”) of the points from the curve. In this context, the least squares fit was used to demonstrate that varying wind speed results in a variation of underwater noise levels. A footnote was added in Section 3.10.5.2.2 for clarification in the Final EIS.</p>
<p>The DEIS should evaluate the implications for finfish, invertebrates, and EFH of a 15 MW turbine producing “SPL measured 100 m from a hypothetical 15 MW turbine in operation in 10 m/s (19 kt or 22 mph) wind would be 125 dB</p>	<p>The EIS will not analyze 15-MW WTGs as this capacity WTG is not part of the Project Design Envelope (PDE)/Proposed Action. Analysis of 15-MW WTGs was considered but dismissed, as discussed in Table 2.2-1. While this alternative will not be discussed in the EIS, implications for finfish,</p>



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re 1 $\mu$ Pa.”	invertebrates, and EFH from these larger WTGs is that high wind speeds would produce higher underwater noise.
Please characterize potential effects of operational noise on fish behavior, communication, masking, feeding, spawning, etc. over the lifetime of project operation, providing citations as appropriate.	Potential effects of operational noise on fish behavior were included in Section 3.10.5.2.2 of the Final EIS.
No rationale is provided for why sturgeon are not susceptible to impingement during operation of the OCS-DC. Additional context should be provided why impingement will not occur.	The through-screen velocity of the proposed offshore converter station (OCS-DC) is less than 0.5 feet per second (ft/s; 0.15 meters per second [m/s]). This through-screen velocity estimate is below the Environmental Protection Agency (EPA) threshold required for new facilities, defined at §125.84(c), and is therefore protective against the impingement of juvenile and adult life stages of finfish.
The only IPF mentioned in this section is noise; however, other IPFs are applicable to ESA-listed fish. The analysis presented is very brief and does not describe any potential impacts. The section is missing IPFs and associated analysis that should be considered for listed fish (i.e., habitat disturbance, vessel traffic, cable laying, pollutants/discharges, lighting, EMF, surveys/monitoring). This is consistent with prior EISs (see Ocean Wind 1). The ESA Info Needs document and prior EISs should be consulted to see the appropriate IPFs to be analyzed. Additionally, it is unclear why listed fish are mentioned above under the Discharge IPF but are not analyzed for any other IPF. NEPA impact determinations should also be used in this section instead of the ESA terminology presently used.	Additional IPFs were added to Section 3.10.5.5, <i>Impacts of Alternative B on ESA-listed Species</i> , including habitat disturbance, vessel traffic, cable laying, pollutants/discharges, lighting, electric and magnetic fields (EMFs), and surveys/monitoring.
BOEM has indicated that the BA to support the ESA consultation will be included as an appendix to the FEIS. In the event that the BA is not included as an appendix, we	Content from the <i>Sunrise Wind Farm and Sunrise Wind Export Cable - Development and Operation Biological Assessment</i> (Biological Assessment) is included in the Final EIS. For additional specific information, please review

NMFS Comment	Response
<p>recommend that a summary of the findings of the BA be provided in the FEIS.</p>	<p>the Biological Assessment document.</p>
<p>Page 3-202 states that SAV “does not occur within the footprint of the SRWF or SRWEC, nor its immediate vicinity”; however, this is contrary to information in the benthic section that appears to suggest SAV may be impacted. Additionally, later in the document on page 3-218, it appears to suggest 1.7 acres of SAV will be impacted. That was not our understanding and recommend you clarify this statement in the document. Information from Orsted’s recent SAV survey should be incorporated and the proximity to SAV and potential impacts should be clearly and accurately described. Additionally, the description of potential impacts to SAV from a frack-out during HDD activity is not supported; specifically the conclusion that these impacts would be minimal and short-term should this adverse effect occur in and SAV bed. Based on information related to SAV recovery, we would anticipate long-term to permanent impacts that would require compensatory mitigation.</p>	<p>Section 3.10.1.3 was updated to reflect that SAV was found within the Intracoastal Waterway (ICW) - horizontal directional drilling (HDD) route.</p>
<p>Throughout this section, the DEIS suggest impacts to all habitat types, including complex habitats are short-term in nature. This is not supported by the best available science which indicates that disturbance to complex habitats result in longer recovery times. The document only appears to cite one study cited that also identifies colonization of invasive species on disturbed complex habitats from anchor scarring. On page 328, this section describes how degradation to sensitive habitats such as SAV and hard bottom could result in long-term to permanent impacts. Despite these habitat being present in the project area, impacts are often described as</p>	<p>BOEM considered how impacts may vary by habitat type (i.e., longer-term impacts for complex habitats) and resources present in the Project Area. These are described throughout Section 3.10 (<i>Finfish, Invertebrates, and Essential Fish Habitat</i>), specifically in the following subsections:</p> <ul style="list-style-type: none"> <li>• Section 3.10.3.2 Cumulative Impacts of the No Action Alternative Anchoring</li> <li>• Section 3.10.3.2 Cable emplacement/maintenance</li> <li>• Section 3.10.5.1.2 Offshore Activities and Facilities Seafloor disturbance</li> <li>• Section 3.10.5.2.2 Offshore Activities and Facilities, Presence of structures</li> </ul>

NMFS Comment	Response
negligible to minor and short-term. We recommend the analysis consider how impacts may vary by habitat type and resources present in the project area.	<ul style="list-style-type: none"> <li>• Section 3.10.5.4 Cumulative Impacts of the Proposed Action, Anchoring</li> <li>• Section 3.10.5.4 Cumulative Impacts of the Proposed Action, Presence of structures</li> </ul>
We recommend the DEIS analyze impacts to Atlantic cod spawning activity from seabed preparation of cable installation. This is a significant omission and we recommend it be included in the FEIS.	BOEM has included an analysis of impacts to Atlantic cod spawning activity from seabed preparation of cable installation.
The section on EMF, noise and port utilization describes measurable effects to fish species and EFH, however, the EIS concludes impacts from these IPFs will be negligible. In some cases, impacts are considered short term and negligible despite contrary information provided in the text. These conclusions are unsupported and inconsistent with the impact level definition for "adverse negligible" impacts.	Impact determinations for the IPFs mentioned have been reconsidered and updated accordingly in the conclusions section for each alternative.
The document only considers invasive species impacts in the context of bilge water. However, colonization of invasive species may also occur from seabed disturbance and/or newly available substrate. The analysis of potential affects from these IPFs are missing from the document and should be analyzed in the DEIS.	Information regarding invasive species colonization has been added to Section 3.10.5.
For accidental release and discharge, there is no supporting peer-reviewed literature cited. Please provide appropriate citations.	References have been added to Section 3.10.5.1.2.
The analysis of noise lacks a discussion of substrate vibration effects on early life stages. Also, the discussion of how noise interacts with behavior and communication particularly during	Information from Sigray et al. 2022, Jong et al. 2020, Siddagangaiah et al. 2022, Stanley et al. 2020, Solé et al. 2022, and Hawkins 2022 have been added to Section 3.10.5.

NMFS Comment	Response
<p>spawning should have a deeper analysis that includes the following literature: de Jong et al. 2020, <a href="https://doi.org/10.1007/s11160-020-09598-9">https://doi.org/10.1007/s11160-020-09598-9</a>; Siddagangaiah et al. 2021, doi: 10.1002/rse2.231; Stanley et al. 2020, doi.org/10.1242/jeb.219683. The discussion on particle motion should additionally include more recent work by Sigray et al. 2022, (doi.org/10.1016/j.marpolbul.2022.113734); Sole et al. 2022 (doi.org/10.1016/j.envpol.2022.119853); Hawkins 2022 (doi.org/10.1121/10.0013994).</p>	
<p>As highlighted in our letter, the best available information should be used to evaluate impacts related to cod spawning activity in the project area. This best available information highlights the overlap with the project area and cod spawning activity and confirms the importance of November and December for spawning activity in this area. The document appears to downplay or minimize the results of studies conducted in the project area. The conclusion that overall impacts of construction noise would be minor from the proposed project is unsupported by the analysis provided in the text and by the best available information.</p>	<p>Results of studies in the Project Area were not available when the Draft EIS was published but have since been added to Section 3.10.1.3, <i>Essential Fish Habitat</i> in the Final EIS.</p>
<p>Please clarify if the developer plans to avoid the conditions described in the following sentence: “Noise impacts from impact pile driving could be greater if pile driving occurs in spawning habitat, occurs during peak spawning periods, and/or results in reduced reproductive success in one or more spawning seasons, which could result in long-term effects to populations if one or more-year classes suffers suppressed recruitment.”</p>	<p>Mitigation measures such as these will be determined through the EFH consultation and may become a condition of Construction and Operations Plan (COP) approval.</p>
<p>Please review the scientific literature on the topic of hydrodynamic effects and include appropriate citations</p>	<p>The literature was reviewed, and hydrodynamic effects were assessed in the Final EIS.</p>

NMFS Comment	Response
<p>including. Christiansen et al. 2022 (<a href="https://doi.org/10.3389/fmars.2022.818501">doi.org/10.3389/fmars.2022.818501</a>); Daewel et al. 2022 (<a href="https://doi.org/10.1038/s43247-022-00625-0">doi.org/10.1038/s43247-022-00625-0</a>), Dorrell et al. 2022 (<a href="https://doi.org/10.3389/fmars.2022.830927">doi.org/10.3389/fmars.2022.830927</a>); and Floeter et al. 2022 (<a href="https://doi.org/10.3389/fmars.2022.884943">doi.org/10.3389/fmars.2022.884943</a>). Please include in your analysis the potential impacts on larval transport.</p>	
<p>Please provide the more recent literature on EMF interactions in the analysis of EMF during operation including: Albert et al. 2020 (<a href="https://doi.org/10.1007/s00227-022-04065-4">doi.org/10.1007/s00227-022-04065-4</a>); Jakubowska-Lehrmann et al. 2022 (<a href="https://doi.org/10.1016/j.marenvres.2022.105700">doi.org/10.1016/j.marenvres.2022.105700</a>); Cresci et al. 2022 (<a href="https://doi.org/10.1093/pnasnexus/pgac175">https://doi.org/10.1093/pnasnexus/pgac175</a>); Harsanyi et al. 2022 (<a href="https://doi.org/10.3390/jmse10050564">https://doi.org/10.3390/jmse10050564</a>).</p>	<p>More recent literature on EMF was included in the Final EIS.</p>
<p>This section discusses discharge from the OCS-DC, but it does not discuss the potential impacts cod spawning activity or early life stages. It should be recognized that the location overlaps with and is adjacent to areas of Atlantic cod spawning activity</p>	<p>The OCS-DC hydraulic zone of influence (HZI) is highly localized and does not extend within 15 ft (5 m) of the pre-installation seafloor grade or 98 ft (30 m) of the surface. Only eggs and larvae that enter the localized HZI would be susceptible to entrainment. A conservative annual estimate of Atlantic cod entrainment is 34,239 organisms. To put this potential entrainment rate in context, a large female Atlantic cod is capable of producing 3 to 9 million eggs annually. This calculation, in terms of equivalent adults, is that 16 adult Atlantic cod could be impacted annually by the OCS-DC.</p>
<p>The overall conclusion of “negligible to moderate impacts on finfish, invertebrates and EFH” is heavily reliant on an expectation that the artificial reef effects will be beneficial. The aggregation of some fish species around structures would be a local increase in abundance; there is no evidence to suggest that production will increase, even locally. Aggregates of reef-associated individuals may gain habitat and food resources but would be vulnerable to predation and fishing pressure. Further, species and life stages that utilize soft</p>	<p>Additional information on the benefits and impacts of artificial reefs was added.</p>

NMFS Comment	Response
<p>bottom habitats would likely not benefit from the addition of structures and may instead experience adverse effects.</p>	
<p>While the section adds some text about Cox Ledge and Atlantic cod spawning activity, there is limited analysis of impacts to these resources. This limited analysis makes it difficult for the reader to understand all potential consequences of the project on complex habitats and cod spawning activity. We recommend the FEIS include a more thorough analysis of all potential effects to cod spawning activity and associated habitats and identify measures to avoid, minimize and mitigate adverse impacts from the project.</p>	<p>New information has been collected on Atlantic cod spawning since the Draft EIS was completed. An analysis of all potential consequences on complex habitat and Atlantic cod spawning and associated habitats has been updated, as have measures to avoid, minimize, and mitigate adverse impacts.</p>
<p>It appears the project level impacts are being evaluated under the same geographic area (GAA) as the cumulative effects analysis, which encompasses the Scotian Shelf, Northeast Shelf, and Southeast Shelf Large Marine Ecosystems. The geographic scope is too large to evaluate impacts of the project. As a result, it is challenging to understand impacts of the project on Cox Ledge and in the context of resources in the Southern New England Area. We recommend project level impacts be bounded by the extent of area impacted under each Impact Producing Factor (IPF). We also recommend the cumulative analysis also discuss anticipated effects of ongoing and foreseeable projects on resources in the SNE region.</p>	<p>The GAA varies according to the anticipated geographic extent of impacts for each resource. The purpose is to capture the cumulative impacts on each of those resources that would be affected by the Proposed Action as well as the impacts that would still occur under the No Action Alternative. Impacts from both the Proposed Action IPFs and from cumulative activities are evaluated using the significance criteria defined in Section 3.3, which consider the potential for population-level impacts. Where applicable, the EIS discloses localized impacts (e.g., to Cox Ledge) from IPFs. However, those impacts are also evaluated in the context of the broader resource extent within the GAA.</p>
<p>Habitat types found in the project area are variable and include soft sediments as well as complex habitats, including pebbles, cobbles and boulders. Recovery of habitat varies by habitat type, with recovery time increasing with increased</p>	<p>Analysis was considered in the context of different habitat types.</p>

NMFS Comment	Response
complexity.	
<p>Despite the different habitat types anticipated to be impacted, the document comes to the same conclusions, often that impacts are short-term and negligible. This is not supported in the DEIS, and is inconsistent with the best available information.</p>	<p>Analysis was considered in the context of different habitat types.</p>
<p>Throughout the document, there are examples where measurable impacts to resources are described, yet the document concludes a “negligible impact”; this is inconsistent with impact level determination definition. We recommend the analysis consider project effects in the context of different habitat types and resources found in the project area and that impact conclusions be supported by the text.</p>	<p>The analysis considered Project effects in the context of different habitats and resources found in the Project Area, and the text supported the impact conclusions.</p>
<p>This section provided limited analysis of impacts to finfish and EFH from operation of the converter station and associated open loop system. Additional analysis should be included, particularly associated with impacts to cod spawning activity and early life stages (eggs and larvae). The proposed location of the converter station overlaps with, and is located adjacent to, areas of spawning activity. We recommend the FEIS evaluate mitigation measures to reduce impacts to finfish and EFH from the converter station, including relocation of the converter station.</p>	<p>The design of the facility included mitigation measures to reduce impacts from the converter station to finfish and EFH. The OCS-DC was designed to have a through-screen velocity of 0.43 ft/s (0.13 m/s; this is below the threshold required for new facilities, defined at §125.84(c)) and is therefore protective against the impingement of juvenile and adult life stages of finfish. Accordingly, only the species with egg or larval life stages present in the vicinity of the OCS-DC would be susceptible to entrainment. The water depth of the intake pipe openings (approximately 30 ft [10 m]) above the seafloor was selected to minimize entrainment of ichthyoplankton and to take advantage of the cooler water temperatures found at depth to minimize water withdrawal volumes. The intake pipe will be equipped with a variable frequency drive (VFD). The VFD technology allows the cooling water intake of the OCS-DC to be optimized as it relates to minimizing water withdrawals as power output and source water temperature vary temporally. Each of the intake pipes would have two coarse filters consisting of a Super Duplex stainless steel vertical housing that encases a series of three banks of wedge wire filter tubes designed to filter suspended solids</p>

NMFS Comment	Response
	and organisms larger than 500 microns. The HZI is highly localized and does not extend within 15 ft (5 m) of the pre-installation seafloor grade or 98 ft (30 m) of the surface. Only eggs and larvae that enter the localized HZI would be susceptible to entrainment; species whose ichthyoplankton are buoyant or benthic would not be affected.
Several IPFs are not analyzed when considering operational impacts of the project and we recommend they be included in the FEIS; including an analysis of risk for invasive species colonization from habitat disturbance and the introduction of new artificial substrates, as well as impacts to finfish, invertebrates and EFH from wind wake and hydrodynamic effects, including impacts to egg and larval distribution.	The IPFs from operational impacts, impacts from wind wake, and hydrodynamic effects on finfish and invertebrates were included in Sections 3.7 and 3.10. The text includes impacts on egg and larval distributions.
Please see our comments on Appendix D regarding the determination of the GAA bounds for marine mammals. Please explain why the area is limited to "most movement of a majority of species" and does not encompass all movement of all species. Because this GAA is the basis for quantity and location of the activities listed in Appendix E, which is a major component of the cumulative effects analysis, an explanation for this approach is important. NMFS has also identified this issue in CVOW, Empire Wind, Mayflower, and Ocean Wind, and NE Wind.	NEPA analysis requires a consideration of the GAA where the Project will have direct or indirect effects. BOEM's approach is consistent with NEPA requirements as well as the 'action area' based approach associated with the Endangered Species Act. Basing the GAA on animal movement instead of Project impacts would require the overall GAA to include potentially all of North and South America, Western Europe, Greenland, Northwestern Africa, the North and South Atlantic, the Arctic Ocean, the Gulf of Mexico, the Caribbean, and the Mediterranean.
The No Action Conclusions section makes impact determinations on the baseline conditions of marine mammals. However, it is missing an impact determination on not approving the COP (i.e., the incremental impact of taking No Action). NMFS advises adding a paragraph along the lines of the following: Under the No Action Alternative, BOEM would not approve Sunrise Wind's COP. Hence, stressors from construction, operation, and maintenance of the Sunrise	This edit was incorporated in Section 3.11.3.4.



NMFS Comment	Response
<p>Project would not occur. Baseline conditions of the existing environment would remain unchanged. Hence, not approving the COP would have no additional incremental effect on marine mammals. Similarly, NMFS No Action alternative (i.e., not issuing the requested incidental take authorization) would also have no additional incremental impact on marine mammals and their habitat.</p>	
<p>"Traffic" section. Please provide updated information and source for North Atlantic right Whale vessel strikes.</p>	<p>Sections 3.11.5.1.2 and 3.11.5.2.2 were updated with this information.</p>
<p>"Lighting" section. Very little information is given as to the different types of added artificial light sources and how marine mammals will react to them. Please provide more detail to support the conclusion that artificial lighting is anticipated to be negligible. Make updates in associated Lighting section in Alternative B.</p>	<p>Section 3.11.4.2.2 was updated to include lighting characteristics and additional analysis regarding potential effects.</p>
<p>"Presence of structures" section. Please provide a source for broader effects on oceanic conditions (Dorrell et al, Christiansen et al).</p>	<p>Consideration of potential effects on regional oceanic/hydrodynamic conditions was added to the Final EIS along with the appropriate citations for both the No Action Alternative and the Proposed Action.</p>
<p>Please provide mitigation measures, or state that proper mitigation measures will be in place to avoid the potential for PTS to occur in NARWs. The EIS will need to state that while the exposure modeling predicts a small potential for PTS, there are enhanced mitigation and monitoring measures in place to avoid PTS. Update the associated G&amp;G Survey section for O&amp;M.</p>	<p>BOEM and Sunrise Wind will be required to submit a Pile Driving Monitoring Plan to NMFS and BSEE for review and concurrence at least 180 days prior to the start of pile driving. This will include requirements for Protected Species Observer (PSO) coverage, sound field verification, finalized shutdown zones, reporting requirements, and the Nighttime Pile Driving Monitoring Plan. This information is detailed in Appendix H.</p>
<p>Please provide a source for the following information. "Although vibratory pile-driving noise can cause behavioral effects at greater distances compared to impact pile-driving noise, the overall sound levels are less intense and less likely</p>	<p>An updated analysis has been provided using NMFS's 2022 <i>Multi-Species Pile Driving Calculator Tool</i> for the isopleth of potential impacts, along with relevant citations. The following reference was included: National Marine Fisheries Service (NMFS). 2022. Multi-Species Pile Driving Calculator Tool.</p>

NMFS Comment	Response
<p>to cause injury. Low-frequency cetaceans would have to remain within 16 ft (4.9 m) over an entire day of vibratory pile driving during temporary cofferdam installation to experience permanent hearing injury, while high-frequency cetaceans would need to remain within less than 591 ft (180.1 m) from the cofferdam installation for an entire workday to experience hearing injury. Phocid pinnipeds would need to remain closer than 34 ft (10.4 m) from cofferdam installation to experience hearing injury."</p>	<p>Version 1.2. Excel file. Updated August 2022. [accessed 2022 Oct 15]. <a href="https://www.fisheries.noaa.gov/resource/data/multi-species-pile-driving-calculator-tool">https://www.fisheries.noaa.gov/resource/data/multi-species-pile-driving-calculator-tool</a>.</p>
<p>Please confirm that the statement "collision-related effects on marine mammal species from the proposed project are negligible" includes risk to the North Atlantic Right Whale.</p>	<p>This edit was incorporated in Section 3.11.5.1.2.</p>
<p>This section cites a paper that observed clear, long term displacement of harbor porpoises from a wind area in Denmark. The following paragraph then states that based on the above information, the presence of visible structures from the proposed action would be short term. Please clarify or expand on this conclusion.</p>	<p>Section 3.11.5.2.2 was updated for consistency.</p>
<p>The following statement needs to be revised here and each time it occurs in the marine mammal section, as it makes an ESA determination that would only be made in a NMFS biological opinion: "we anticipate that the Proposed Action for the SRWF Project are likely to adversely affect, but not jeopardize the continued existence North Atlantic right, sei, fin, or sperm whales." A preliminary determination may be made by an action agency in a biological assessment but the final determination is made by NMFS. NEPA impact definition terminology should be used instead.</p>	<p>The text was changed to use NEPA impact definition terminology.</p>

NMFS Comment	Response
<p>The current body of literature does not support the minor beneficial impact determination used for presence of structures. Structures may provide additional foraging opportunities for some marine mammal species but also may increase the potential for fishery interactions. Presence of structures may also disrupt aggregations of planktonic prey for certain marine mammal species. Additionally, it is unclear how impacts from Project O&amp;M would occur for a lesser extent and duration given the operational phase of the project is ~30 years compared to ~3 years for construction. This conclusion section should be revised.</p>	<p>Thank you for your comment. This comment appears to support the existing determination as it points out the mixed potential for both negative and beneficial impacts, which is described in the analysis for the presence of structures. The potential for impacts to planktonic prey resources for certain whale species is described in the analysis and is anticipated to have negligible impact. Analysis for the presence of structures was not parsed between construction and O&amp;M. Instead, the analysis was consolidated with the analysis of impacts from the O&amp;M phase. The conclusion was intended to describe that there is a potential for short-term displacement. The conclusion has been updated to remove the consideration of short-term effects because there is also the potential for long-term, minor displacement effects to some species in addition to long-term, minor beneficial effects on the distribution, abundance, and availability of prey and forage resources for other species.</p>
<p>The Cumulative Impacts of the Proposed Action section states that "population-level effects would not be expected for most species. The exception to this is the North Atlantic right whale, due to the small size of its population and frequent occurrence in shallow coastal zones." The very next section, Proposed Action on ESA Listed Species, concludes that "the Proposed Action for the SRWF Project is likely to adversely affect but not jeopardize the continued existence of North Atlantic right, sei, fin, or sperm whales." These two statements are contradictory. Please clarify.</p>	<p>Endangered Species Act (ESA) determinations were removed, and more clarity was provided in separate determinations for NARW versus other listed species.</p>
<p>General: NMFS is currently working with BOEM to develop a FEIS for Ocean Wind 1 that will be sufficient for NMFS' adoption needs. Please incorporate all improvements to the OW1 FEIS in the Sunrise FEIS.</p>	<p>The Ocean Wind Final EIS was used to inform updates to this Final EIS.</p>

NMFS Comment	Response
<p>General: NMFS continues to recommend that impact conclusions for marine mammals are not lumped but, for all Alternatives, are partitioned out by NARWs, other mysticetes, odontocetes and pinnipeds with supporting analysis for each group included.</p>	<p>Impact level determinations were parsed out into marine mammal groups (mysticetes, odontocetes, and pinnipeds), with separate impact level conclusions for NARW where appropriate.</p>
<p>NMFS had previously commented that UXO detonation was missing from No Action impacts, and we have concerns that our previous comments were not addressed in the DEIS. This section is about future planned projects wherein developers are proposing to detonate UXOs. Developers have requested, and NMFS has proposed to authorize Level A harassment and Level B harassment of marine mammals incidental to UXO detonation (see OW1 and Revolution Wind rules). We again recommend impacts associated with UXO detonation be included in the analysis to ensure an accurate description of impacts from future planned projects.</p>	<p>A UXO detonation IPF was added to the No Action Alternative.</p>
<p>The FEIS should include information contained within Sunrise Wind's updated density and take estimation memo. NMFS received this on December 15, 2022. We are not aware of when BOEM received it but it would have been around that time.</p>	<p>The updated density estimates were added based on Duke model updates in June 2022 and are provided in Table 3.11-2, "Abundance Estimates of Marine Mammals Expected to Occur in the Proposed Project Area."</p>
<p>According to NMFS PACM website, there was one definite acoustic detection of a blue whale in close proximity to the lease area in 2013 and one possible detection last year; therefore we agree that it would be unusual for blue whales to occur near the lease area. However, because the developer has requested, and NMFS proposes to authorize a very small amount of take for this species, and given that NMFS is using this EIS to satisfy NEPA, please add a statement indicating that blue whale are not likely to occur near the project; however,</p>	<p>Blue whales were added for consistency with the determinations made in NOAA's proposed Letter of Authorization under the Marine Mammal Protection Act (MMPA).</p>

NMFS Comment	Response
Sunrise has requested and NMFS proposes to authorize a very small amount of take of blue whales. The MMPA does not contain a "reasonably expected" standard and we request there be recognition of the developer's request and NMFS' action in this EIS.	
Citations for the thresholds listed should be included for Table 3.5.7-3.	The threshold citations were added to the Final EIS in Section 3.12.3.2.
Please include/list some 'other disturbances' that are referenced.	Vessel traffic and drone operation were added to the statement referencing 'other types of disturbances'.
It appears the Traffic and Lighting IPFs are intermingled in the same paragraph. This should be revised for clarity in the FEIS. Additional information should be provided regarding the frequency and severity of vessel strikes anticipated and which sea turtle species are expected to experience serious injury or mortality. This information is necessary to support the conclusion that there will be no population level effects. A regional vessel traffic analysis is not needed to describe these impacts, there is information in project COPs and BAs that can support this analysis.	Possible vessel impacts from lighting impacts for this section were separated. The agency responsible for monitoring and reporting marine mammal and sea turtle strandings and mortality from vessel strikes and other causes does not publish or publicly report this data. Updates were made based on available information in Sections 3.12.3.2, 3.12.5.1.2, and 3.12.5.2.2.
Please provide justification and specific detail on how horizontal directional drilling underneath potential sea turtle nesting sites during cable installation would avoid impacts to sea turtle nesting areas.	Information that HDD is not anticipated to pass under nesting areas was added to Section 3.12.5.1.1.
Suction hopper dredging is being proposed for sand wave leveling and cable installation. Sea turtles are known to be vulnerable to impingement and entrainment in hopper dredges and injury and mortality has been documented. The DEIS mentions that "consultations with agencies in development of environmental protection measures such as	Protected Species Observers can reduce the potential for impingement or entrainment by spotting turtles surfacing within the shutdown zone. Suction hopper dredges move slowly, providing some opportunity to spot sea turtles as they surface to breathe. While this is not a fully protective measure, it does provide some opportunity to avoid injury or mortality when they are observed in the area.

NMFS Comment	Response
<p>the use of PSOs are likely to reduce the risk of injury or mortality to sea turtles”. Please provide details that support the use of PSOs in order to reduce the risk of sea turtle impingement or entrainment during hopper dredge activities. Given that sea turtles may be resting/foraging on the seafloor, PSOs may not be effective.</p>	
<p>Please include that increased surfacing time due to underwater noise would put sea turtles at greater risk for vessel strike.</p>	<p>This information was added to Section 3.12.5.1.2, along with details about the overlap between the shutdown zone and areas where sea turtles experience behavioral impacts and may spend more time at the surface and, therefore, be more vulnerable to vessel strikes.</p>
<p>Please provide additional details with respect to the pre-survey clearance monitoring measures that will be implemented prior to UXO detonation/blasting. Specifically, how will the MEC/UXO clearance zones be monitored for the presence for sea turtles prior to UXO detonations?</p>	<p>Updated information on the monitoring, avoidance, and mitigation strategies for sea turtles during MEC/UXO clearance activities was added to Section 3.12.5.1.2.2.</p>
<p>There is no consideration of a noise mitigation system in this section. Given that nighttime pile driving is proposed and the DEIS states that mitigation measures are not expected to reduce risk of exposure at night, it should be clarified that a noise mitigation system will be utilized (and how). And, the effects of nighttime pile driving on sea turtles should be considered given the lack of effective monitoring.</p>	<p>Modeling of the potential effects on sea turtles is based on a worst-case scenario, using the assumption that monitoring and mitigation strategies are not effective. Explanatory text has been added to clarify that exposure estimates are based on this approach and that daytime monitoring and mitigation are expected to lower the potential for effects from the modeled values, while nighttime pile driving will not effectively be able to reduce exposure through monitoring.</p>
<p>The DEIS mentions the use of several gear types such as gillnets during sampling efforts for fisheries monitoring surveys. The consideration of fishery monitoring surveys have the potential to catch and entangle/capture sea turtles. Please provide the specific gear types that will be used and the mitigation measures that will be implemented to reduce the likelihood for capture and entanglement of sea turtles during</p>	<p>Section 3.12.5.1.2 was updated to reflect the Fisheries and Benthic Monitoring Plan.</p>

NMFS Comment	Response
fishery monitoring survey sampling.	
<p>Gless et al. (2008) conducted a study on the response of juvenile leatherback turtles to light. They found that the subjects either 'failed to orient or oriented away from the lights.' This study only observes juvenile leatherbacks, not all species of marine turtle, and the results cannot be applied to all other marine turtle species. Loggerheads, for example, have been shown in previous studies to be attracted to lights produced from longline fishing vessels, as stated in the DEIS. Therefore, the conclusion 'there is no convincing evidence that marine turtles are attracted to vessel lights' cannot be drawn. Please revise.</p>	<p>The following language was added: "If sea turtles are attracted to the lights, it could increase the potential for interaction with equipment or associated Project impacts. However, due to the nature of Project activities and associated seafloor disturbance, turbidity, and noise, sea turtles are not likely to be attracted by lighting because they are disturbed by these other factors." This language is consistent with NMFS' analysis in both the Ocean Wind and Revolution Wind biological opinions.</p>
<p>This paragraph is in the operations and maintenance section, and begins with the claim that 'construction impacts to sea turtles could occur...' Please fix.</p>	<p>This was corrected in Section 3.12.5.2.2.</p>
<p>Clarify how the turbines proposed for use by Sunrise Wind relate to the turbines referenced in the sources in the Non-Impulsive WTG Operation section that are used to support the conclusion that operational noise impacts will be negligible. The turbines proposed for Sunrise are larger and will be installed on monopiles which differs from the smaller turbines (on jacket foundations) used for Block Island Wind Farm.</p>	<p>SRWF will use direct-drive turbines instead of gear-driven. Section 3.12.5.2.2 was updated with appropriate references and clarifying discussion based on the turbine type. However, even geared turbines would not be expected to reach the 175 dB rms behavioral threshold during normal operation.</p>
<p>Sea turtles do not forage on calanus. Thus, this analysis of the impacts to prey species is not accurate. Sea turtles do forage on other planktonic species such as jellyfish and salps. This section should be revised to be biologically accurate. Consider using some of the information presented in the finfish section.</p>	<p>Calanus was used as a proxy to estimate the potential impact on any given planktonic species for the potential proportional impact on prey species.</p>

NMFS Comment	Response
<p>The claim "This intake velocity estimate is below the threshold required for new facilities defined at 40 CFR §125.84(c) and is therefore protective against the impingement of juvenile and adult life stages of sea turtles. Therefore, it is anticipated that only egg and larval life stages of all species are at risk of entrainment." is misleading with regard to the life stages of sea turtles.</p>	<p>The reference to egg and larval stages was removed from the sea turtle section.</p>
<p>Please include that sea turtle eggs will be laid onshore and therefore not affected by seawater cooling. The eggs and larval stages would be to non-sea turtle species.</p>	<p>The reference to egg and larval stages was removed from Section 3.12.2.2.</p>
<p>The first sentence of the Traffic section states that "vessel traffic would be similar, but less than, those identified for O&amp;M of the SRWF" - however this section is the O&amp;M section. Please revise. Additionally there is no supporting reference to support the stated "negligible increase" in vessel traffic. Additional information should be provided regarding the frequency and severity of vessel strikes anticipated and which sea turtle species are expected to experience serious injury or mortality. This information is necessary to support the conclusion that there will be no population level effects.</p>	<p>This was corrected, and additional information was added in Section 3.12.2.2 on the proportional change in vessel traffic during O&amp;M. The analysis was carried forward based on that information.</p>
<p>The following statement needs to be revised here and each time it occurs in the sea turtle section, as it makes an ESA determination that would only be made in a NMFS biological opinion: "we anticipate that the reasonably foreseeable offshore wind activities are likely to adversely affect but not jeopardize the continued existence of leatherback, loggerhead, Kemp's ridley, or green sea turtles." A preliminary determination may be made by an action agency in a biological assessment but the final determination is made by NMFS. NEPA impact definition terminology should be used</p>	<p>The language was revised to use NEPA impact terminology.</p>



NMFS Comment	Response
instead.	
<p>The conclusion in this section reads that population-level effects would not be expected for most species. There are only four species of sea turtle discussed in this section. Please include if any species is expected to have population-level effects, or change wording to clarify that population-level effects are not expected for any species.</p>	<p>The conclusion sections were corrected to state that population level impacts would not be expected for any sea turtle species.</p>
<p>Mitigation and monitoring measures are only briefly referenced with no analysis of their effectiveness. Additionally, measures that are mentioned are very sparse. Given the reliance on mitigation measures as part of the analysis, the lack of details regarding the actual measures, how they will be implemented, and their effectiveness is problematic and does not allow for a complete analysis. This should be addressed in the FEIS.</p>	<p>The factors considered most likely to have an impact on sea turtles include potential entrainment from dredging, underwater noise, vessel traffic, and gear utilization associated with trawl surveys. For all included analyses, we adopted a conservative approach to analyzing potential impacts, assuming minimal or no effectiveness to mitigation measures where the level of protective effect of those measures was uncertain. Dredging was considered to have some risk of entrainment for sea turtles with some unknown level of reduction from the use of Protected Species Observers (PSOs). Therefore, the impact analysis was based on dredging alone without a reduction in impact levels from using PSOs. Analysis for underwater noise impacts was completed assuming the worst-case scenario (e.g., mitigation is ineffective); therefore, mitigation measures were not key to making that impact level determination. The potential for vessel strikes was analyzed, including the APMs for voluntary speed reductions and vessel traffic levels for the area. Trawl survey methods were analyzed based on the proposed methods, and no additional mitigation measures were proposed.</p>
<p>In the first paragraph of § 3.6.7.1.5, the word "stations" is misspelled as "statins". In the first paragraph of § 3.6.7.1.5, would you please replace the misspelled word "statins" with its correct spelling "stations" in the following sentence: "NOAA-funded HF radar statins operated by NOAA Integrated Ocean Observing System (IOOS) academic partners exist within the region..."? [NOAA/NOS/IOOS]</p>	<p>The text has been revised in Section 3.20.1.5 (previously Section 3.6.7.1.5 in the Draft EIS) to correct the spelling to "stations."</p>

NMFS Comment	Response
<p>Please update the text to state that the "final", not "draft", report was released, see second sentence under Scientific Research and Surveys: "On December 5, 2022, NOAA Fisheries and BOEM published the final Federal Survey Mitigation Implementation Strategy for the Northeast U.S. Region.</p>	<p>The text has been revised in Section 3.20.9.1 to correct this.</p>
<p>There are many areas that speak to weather within the document, but nothing pertinent to the NEXRAD WSR-88D radar which is primarily used by National Weather Service Weather Forecast Offices during inclement weather to produce Watches, Warnings, and Forecasts for the protection of life and property. [NOAA/NWS/ROC]</p>	<p>Available information on the NEXRAD WSR-88D radar was reviewed, and pertinent material was included in the Final EIS. National Weather Service NEXRAD radar systems used in predicting and monitoring weather patterns will be impacted similarly to HF radars; however, NOAA states that impacts to NEXRAD radars are highest within a 3 km range and diminish as distance increases.</p>
<p>Please correct the last sentence by adding the word "met". The sentence should read "...which, after independent review, may be MET via adoption..."</p>	<p>The correction was made.</p>
<p>NMFS requests further clarification for the bounding of the Geographic Analysis Areas (GAAs). Please either provide an explanation in the text for the reason the GAA was restricted to capturing "the majority of the movement range for most species", or expand the GAA to include all movement of all species. NMFS has made this comment on multiple other project EISs, but this issue remains unresolved.</p>	<p>Where appropriate, the Draft EIS analysis did include adjacent leases. Section 1.6.1 explains how GAAs were applied, and resource-specific GAAs were defined at the beginning of each resource section in Chapter 3 of the EIS.</p>
<p>Please remove or revise the text at the top of page E-36 that reads: "BOEM developed the following tables based on its 2019 study National Environmental Policy Act Documentation for Impact-Producing Factors in the Offshore Wind Cumulative Impacts Scenario on the North Atlantic Outer Continental Shelf (BOEM 2019), which evaluates potential impacts associated with ongoing and future non-offshore wind activities. The content of these tables has been vetted by cooperating</p>	<p>The text was revised to eliminate reference to cooperating agency vetting of information.</p>

NMFS Comment	Response
<p>agencies to the EIS and therefore has been included in whole for their use in impact and cumulative analyses, and for ease in reference by the reader." This language suggests that the exact content of the tables that now appear in Appendix E were copied in their entirety from another document which had been vetted by the cooperating agencies at some point. NMFS, in its cooperating agency role, has not vetted the content of these tables. While NMFS has approved of tables that appeared in previous EISs and follow a similar approach and contain similar elements (i.e., South Fork Wind and Vineyard Wind), the content and variables of the tables in Appendix E are different than what appear in the tables of prior EISs.</p>	
<p>In the fourth paragraph, after the conclusion of the first sentence, please add the following sentence: "If a mitigation measure was analyzed in the impacts analysis for the selected alternative and that measure influenced the impact determination for a particular resource, that measure will be included as a term and condition." Any mitigation and monitoring terms that influence the impact conclusions need to be committed measures or proposed as part of the action in order for the assumptions and conclusions of the analysis to be accurate.</p>	<p>Appendix H has been revised to include this sentence.</p>
<p>Please ensure that all tables, figures, and graphs are 508 compliant before the EIS is made available to the public.</p>	<p>All EIS documents are made 508-compliant when released to the public.</p>

**O.4.1.2. U.S. Environmental Protection Agency**

**Table O-3. Responses to Comments from U.S. EPA [BOEM-2022-0071-0171]**

EPA Comment	Response
<p>Section 3.4.1 (pg. 3-8) of the DEIS indicates that the geographic analysis area covers the airshed within 15.5 miles of the onshore components and ports, the area within 3 nautical miles of state borders, the area within a 25-mile radius of the SRWF centroid and the offshore export cable centroid. For offshore analyses, it is unclear whether statute or nautical miles are being considered to support the geographic analysis area in Table D-1 Appendix D.</p> <p>Recommended Action: EPA understands that for offshore construction and operations emissions estimates, many developers are aligning their anticipated emissions between their Construction and Operations Plan and their Clean Air Act (CAA) Outer Continental Shelf (OCS) permit application, and within EPA’s regulation at 40 CFR part 55, we interpret miles to be measured in nautical miles for the purpose of determining potential emissions from the source. EPA recommends that the FEIS clarify the metric used the in geographic analysis area for its offshore analysis and update Table D-1 Appendix D accordingly.</p>	<p>The metric used for defining the GAA was clarified in Section 3.4.1 and Appendix D, Table D-1.</p>
<p>Section 3.4.1.5.1.2 (pg. 3-19) of the DEIS indicates that offshore construction air emissions will be mitigated by using low sulfur diesel in generators on the WTGs or OCS-DC; low sulfur fuel, marine distillate, or marine residual fuels on vessels; engines that meet applicable air emissions standards to satisfy Best Available Control Technology and Lowest Achievable Emission Rate requirements; dust control; and obtaining emission reduction credits if required by the OCS permit. In past finalized offshore wind projects, e.g., Vineyard</p>	<p>Table H-3 of Appendix H has been updated to include these mitigation measures as appropriate. Please note that not all of these mitigation measures are within BOEM's statutory and regulatory authority but could be adopted and imposed by other governmental agencies.</p>

EPA Comment	Response
<p>Wind 1 and South Fork Wind, EPA has previously required more specific requirements on the use of Tier 4 engines located on the offshore substations and WTGs. Furthermore, EPA has required Tier 4 engines for project vessels operating as OCS sources with allowances for lower tiered engines if those vessels with associated engine are not available at the time of deployment.</p> <p>Recommended Action: EPA recommends that the FEIS acknowledge past determinations made by EPA on previously finalized permits for engines operating on offshore substations and WTGs and consider building in conditions that mimic past requirements for the use of Tier 4 engine standards. Additionally, EPA recommends acknowledging the vessel engine requirements EPA has required in past permits and consider adopting a similar structure into the FEIS.</p> <p>Furthermore, as an additional mitigation measure, BOEM should require Sunrise Wind to pursue the procurement of the most efficient and lowest emitting vessels available during the vessel contracting stage of the project. As part of this process, the FEIS should provide a discussion of the various options that are available to reduce these emissions. The FEIS should consider options for reducing emissions from ongoing operations and maintenance activity, such as the purchase of lower emitting or electrified crew vessels.</p>	
<p>Section 3.4.1.1 (pg. 3-9) of the DEIS indicates that there are no Class I areas within the geographic analysis area. The closest Class I area to the proposed Project Area is the Lye Brook Wilderness in Vermont. The Fire Island National Seashore is a Class II area meaning that some air pollution is permitted if the National Ambient Air Quality Standards and increment values, when applicable, are not exceeded.</p>	<p>BOEM added information from the Outer Continental Shelf (OCS) Air Permit Application and the air quality and visibility analyses into the Final EIS.</p>

EPA Comment	Response
<p>Recommended Action: While no Class I area may be within the geographic analysis area BOEM is considering, EPA has required an air quality analysis and visibility analysis as part of the Sunrise Wind CAA OCS permit application. BOEM should consider adding the results of this analysis in the FEIS as additional information. The Sunrise Wind Class I analysis includes modeling results comparing the impacts of the proposed action to Class I significant impact levels of NAAQS pollutants and visibility using the CALPUFF modeling program. EPA also encourages BOEM to consider the application of long-range transport air quality modeling to evaluate impacts at Class I areas within a 300 km range of the project.</p>	
<p>Section 3.4.1.5.2.2 (pg. 3-22) of the DEIS indicates that the potential health benefits of avoided emissions were evaluated using USEPA’s CO-Benefits Risk Assessment (COBRA) health impacts screening and mapping tool (USEPA 2022d). This tool estimates the health and economic benefits of clean energy policies. The COBRA web edition was used to analyze the health impacts of avoided emissions in New York, Connecticut, Rhode Island, and Massachusetts. However, in past EPA comments on BOEM EIS documents, EPA has recommended the use of Avoided Emissions and generation Tool (AVERT). The avoided emission estimates are provided in Table 3.4.1-4 (referenced as taken from the COP) but it appears to have been done using the COBRA program.</p> <p>Recommended Action: EPA continues to recommend the use of AVERT to evaluate emissions avoided.</p>	<p>Avoided emissions were estimated using BOEM’s 2017 <i>Technical Documentation for the Offshore Wind Energy Facilities Emission Estimating Tool</i>. The text has been added for clarification.</p>
<p>Section 3.4.1.5.1.1 (pg. 3-16) of the DEIS states, “Sunrise Wind would implement environmental protection measures (APM AQ-01, AQ-02, AQ-03, AQ-04, AQ-05, AQ06, AQ-07, COP Section 4.3.4.3, Sunrise Wind 2022) to reduce or avoid air emissions during onshore construction</p>	<p>The duplicate paragraph was deleted.</p>

EPA Comment	Response
<p>and installation activities. These measures include using engines and equipment that meet applicable air emissions standards (Tier 3, and if applicable, Tier 4); only using diesel generators during commissioning or emergencies; using low sulfur diesel fuel, marine distillate, or marine residual fuels; dust control; and using gas insulated switchgears to detect SF6 leaks. Onshore air emissions would be greatest during the construction phase and would be offset by the potential reduction in fossil fuel emissions. Air emissions would be intermittent throughout the 2-year construction phase and would have a minor to moderate impact on air quality.” However, this paragraph is repeated in the next paragraph.                      Recommended Action: EPA recommends deleting the duplicate paragraph.</p>	
<p>Page 3-10 of the DEIS states, “For emission sources within state boundaries, within state territorial waters (3 nm [3.5mi; 5.6 km] of the shore) that are not included in the OCS air permit, and within a nonattainment area, BOEM must make a general conformity determination (40 CFR §93, Subpart B). It must be demonstrated that the action upholds the SIP, would not cause or contribute to new violations of the NAAQS, increase the frequency or severity of any violation of a NAAQS, or delay timely attainment of a NAAQS or any required interim emission reduction or milestone. The general conformity determination excludes emissions accounted for in the OCS air permit. The general conformity determination includes emissions from construction and O&amp;M of the onshore facilities and construction and O&amp;M vessel transit through state waters outside of the 25- mi (40.2-km) OCS source centroid.”                      Recommended Action: BOEM did not provide the draft general conformity determination along with supporting materials which</p>	<p>The activities for which BOEM has authority are outside of any nonattainment or maintenance area and, therefore, not subject to the requirement to show conformity. Discussions of, or comparisons to, general conformity emissions have been removed from the EIS.</p>

EPA Comment	Response
<p>describe the analytical methods and conclusions relied upon in making the applicability analysis and draft conformity determination. Based upon the material provided, the following items need to be addressed:</p> <ol style="list-style-type: none"> <li>1) Appendix K of the COP, which BOEM references as containing emissions calculations, is not publicly accessible.</li> <li>2) It is unclear whether any marine vessel emissions that wouldn't be covered by an OCS permit are included in the applicability analysis.</li> <li>3) For each non-attainment area, the applicability analysis should sum emissions from all counties in the non-attainment area for comparison to the general conformity de minimis threshold.</li> </ol> <p>Please contact Gary Rennie, EPA Region 1 at <a href="mailto:rennie.gary@epa.gov">rennie.gary@epa.gov</a> or Dan Birkett, EPA Region 2 at <a href="mailto:birkett.daniel@epa.gov">birkett.daniel@epa.gov</a> for further assistance related to general conformity.</p>	
<p>Page 3-16 of the DEIS explains that NOx emissions in New York City and Port of Coeymans/Port of Albany exceed the general conformity de minimis thresholds during the two-year construction phase and asserts that they “would have a minor to moderate impact on air quality.”</p> <p>Recommended Action: EPA recommends that BOEM explain the basis for this conclusion, which appears to contradict the definition of the “Moderate” impact level in Table 3.4.1-2: “Air emissions would be detected but would not exceed NAAQS or general conformity emissions. Air emissions could be minimized with PMEs.”</p>	<p>The activities for which BOEM has authority are outside of any nonattainment or maintenance area and, therefore, not subject to the requirement to show conformity. Discussions of or comparisons to general conformity emissions have been removed from the EIS.</p>



EPA Comment	Response
<p>In Table 3.4.1-3 (page 3-17), the general conformity thresholds for the New York Northern New Jersey-Long Island, NY-NJ-CT ozone nonattainment area (which includes Kings and Suffolk counties in New York) are listed as 50 tpy. The area was reclassified on November 7, 2022, as “severe.” The applicable thresholds in severe nonattainment areas are 25 tons per year for NOx and VOCs.</p> <p>Recommended Action: EPA recommends correcting Table 3.4.1-3 to list the applicable thresholds of 25 tpy for NOx and VOCs for the New York-Northern New Jersey-Long Island, NY-NJ-CT ozone nonattainment area (which includes Kings and Suffolk counties in New York).</p>	<p>Table 3.4.1-3 was updated to reflect the reclassification of the New York-Northern New Jersey-Long Island, NY-NJ-CT ozone nonattainment area.</p>
<p>Section 3.5.6.5.2.2 of the DEIS (p. 3-300/PDF p. 422 and p. 3-345) discusses impacts to marine mammals in a section identified under “Accidental releases – cooling water.”</p> <p>Recommended Action: This heading seems inappropriate because cooling water is continuously withdrawn and discharged (i.e., not accidental). We recommend removing “Accidental releases” from the title of this section and rename it “Cooling Water” instead to clarify these are not accidental.</p>	<p>The IPF under Section 3.11.5.2 (Previously 3.5.6.5.2 in the Draft EIS) was retitled Operation of OCS-DC.</p>
<p>The DEIS (p. 3-52/PDF p. 174) states “Under the CWA, facilities that employ a cooling water intake structure with a design intake flow greater than 2 MGD and use at least 25 percent of the water withdrawn for cooling purposes are required to obtain an NPDES permit.”</p> <p>Recommended Action: This statement is incorrect and should be revised to reflect that any discharge of pollutants from a point source to a water of the U.S. is required to obtain an NPDES permit. Sunrise Wind has submitted a complete NPDES application to EPA for</p>	<p>The text in Section 3.5.7.2.2 (previously Section 3.4.2.5.2.2 in the Draft EIS) was corrected.</p>

EPA Comment	Response
<p>authorization of discharges to waters of the U.S. The use of a cooling water intake structure in this case means the facility is also subject to the requirements of Section 316(b) of the CWA and the applicability of Section 316(b) is not specifically tied to the size or amount of cooling water withdrawn.</p>	
<p>Table 3.1-1, page 3-4, under Discharges, indicates that there are onshore point sources. If so, NYSDEC would be responsible for permitting.</p> <p>Recommended Action: If this is the case, it should be reflected in the corresponding Description block and discussed in the EIS. Currently only EPA and USCG are mentioned within the Description block. Section 3.4.2.1.1 Onshore, describes that the onshore transmission cable (OTC) would cross the intercoastal waterway and Carmans River and what the water quality requirements are for these two water bodies. However, potential impacts on water quality appears to be from land disturbance and port utilization - not necessarily a point source discharge. If so, Table 3.1-1 should be corrected.</p>	<p>There are no known onshore point sources. The text in Table 3.1-1 was corrected.</p>
<p>The DEIS (Page 3-234) notes “[t]he NPDES permit included annual entrainment estimates of ichthyoplankton grouped within the egg and larval stages (Sunrise Wind 2022, Appendix N2). Since no distinction was made between the two life stages within the NPDES permit, entrainment numbers were considered larval estimates only when calculating adult equivalent losses to be conservative.”</p> <p>Recommended Action: Considering a draft NPDES permit has not yet been released for public comment, the NPDES permit application should be referenced and provided.</p>	<p>Thank you for your comment. The draft National Pollutants Discharge Elimination System (NPDES) Permit is referenced in the Final EIS, and a reference has been added to this section as well.</p>

EPA Comment	Response
<p>Page 3-346 indicates that “[t]here is potential that entrained individuals would survive passage through the CWIS due to short residence time in the system and a maximum water temperature exposure of only 90°F (32°C)” and refers to a 2000 EPRI study. However, during development of the 2014 CWA 316(b) Existing Facilities Rule, EPA determined that overall entrainment survival is extremely low and for purposes of national level estimates, entrainment leads to 100 percent mortality of entrainable organisms. In addition, the seawater passes through 500-micron filters, contact with which may introduce additional mortality for early life stages.</p> <p>Recommended Action: Lacking site specific/project specific information we recommend that BOEM not consider potential survival in the analysis of entrainment mortality.</p>	<p>BOEM did not consider potential survival in their analysis of entrainment mortality. This sentence was included to demonstrate that the entrainment estimate is conservative.</p>
<p>Design of the OCS-DC cooling system</p> <p>Recommended Action: The DEIS should explain whether alternative discharge port/diffuser designs were considered to optimize turbulent mixing of cooling water discharge.</p>	<p>Sunrise Wind initially considered several alternative outfall designs to contain the thermal plume, defined as a change of 2°F (1°C), per EPA’s Quality Criteria for Water 1986 “Gold Book,” within the regulatory mixing zone of 330 ft (100 m) from the point of discharge as defined at 40 CFR §125.121(c). The computational modeling using the Cornell Mixing Zone Expert System (CORMIX) was conducted under conservative, worst-case conditions. These worst-case assumptions were as follows: ambient temperatures were based on the spring season, which is when the ambient water temperature is lowest; flow conditions were based on a slack-tide scenario, which results in minimum turbulent mixing; and effluent flow was assumed to be the maximum flow of 8.1 million gallons per day (MGD); which is more than twice the 4.0 MGD average flow anticipated during the spring season.</p> <p>The modeled results under these conservative assumptions showed that the thermal plume will be contained within 87 ft (27 m) of the</p>

EPA Comment	Response
	<p>discharge point with no migration to the surface waters or benthos. That is, the non-diffuser designs would result in rapid and complete mixing with no potential to cause unreasonable water quality degradation beyond the regulatory mixing zone. Sunrise Wind assessed a diffuser design early in Project development; however, such a design would increase the complexity of the outfall and the potential inspection, instrumentation, and maintenance requirements (on this uncrewed platform) to ensure the smaller ports of the diffuser remained clear of biofouling, and thus increase the risk of a potential shut down of the OSC-DC. Because the conservative, worst-case scenario of the thermal plume without a diffuser was well within the regulatory mixing zone limits, and an alternative design with a diffuser increases the complexity and risk without offering a corresponding environmental advantage, a diffuser design was not carried forward.</p>
<p>It appears that the most significant potential impacts on communities with environmental justice concerns in New York, New Jersey, Connecticut, Massachusetts and Rhode Island are related to the use of port facilities for berthing, staging, and loadout to support the construction and installation of offshore facilities. The DEIS states that potential EJ impacts at specific ports cannot be evaluated because BOEM is not certain which ports may be utilized for this project.</p> <p>Recommended Action: Localized EJ impacts at the ports being considered for usage should be fully identified in the FEIS for the selected alternative and affected communities, including port communities, should be given an appropriate opportunity to comment based on targeted outreach from BOEM. Additionally, port expansion and modifications to support the development of offshore wind infrastructure that may lead to increased port utilization constitute a</p>	<p>The ports to be utilized for construction and O&amp;M activities have not been finalized. A list of possible ports to be utilized throughout the Project is presented in Table 3.17-5. The table includes the state in which the ports are located and any associated environmental justice communities. Environmental justice communities are also mapped in Figures 3.17-1 through 3.17-19. Port expansions and/or modifications are not considered part of the Proposed Action.</p> <p>The Final EIS identifies communities that the Project could disproportionately and adversely impact by identifying Census Block Groups adjacent to potentially utilized ports. These Census Block Groups are discussed in Section 3.17.1, and a comprehensive table of all 8,120 Census Block Groups in the GAA is provided in Appendix B.</p> <p>Outreach to communities around the Project Area was conducted through the NEPA process. Public scoping meetings and public</p>

EPA Comment	Response
<p>reasonably foreseeable, indirect effect of the Proposed Action. Such impacts to communities with environmental justice concerns adjacent to such ports should be considered and disclosed.</p>	<p>hearings followed the release of the Draft EIS.</p>
<p>Air quality impacts associated with onshore activities and facilities are indicated to constitute a minor disproportionate impact on adjacent communities with environmental justice concerns. However, Section 3.4.1 (Air Quality) indicates that emissions from onshore activities and activities supported by ports in New York are estimated to exceed the de minimis thresholds.</p> <p>Recommended Action: BOEM should disclose the local air quality impacts, compare project emissions to the county inventory of emissions and rectify this potential discrepancy in classification of air quality impacts to communities with environmental justice concerns.</p>	<p>Thank you for your comment. County-level emissions data from the 2020 National Emissions Inventory has been added to Section 3.4.1 and compared to onshore emissions in Sections 3.4.5.1 and 3.4.5.2. While a few of the individual ports (i.e., Port of Albany, Port of Providence, Sparrows Point) may exceed de minimis thresholds, these emissions would be dispersed over time and would likely not cause nonattainment of air quality standards.</p>
<p>While the DEIS analyzes other ongoing and reasonably foreseeable future activities, as currently written, BOEM’s EJ analysis does not consider these cumulative impacts in the determination of disproportionately high and adverse impacts. In accordance with the Promising Practices for EJ Methodologies in NEPA Reviews (Interagency Working Group on Environmental Justice, Promising Practices for Environmental Justice Methodologies in NEPA Reviews (p.39), March 2016.), “agencies may wish to consider factors that can amplify identified impacts (e.g., the unique exposure pathways, prior exposures, social determinants of health) to ensure a comprehensive review of potential disproportionately high and adverse impacts to minority populations and low-income populations.” CEQ’s guidance, Environmental Justice: Guidance Under the National Environmental Policy Act (1997) also encourages agencies to consider relevant public health and industry data concerning the potential for multiple or cumulative exposures to human health or environmental hazards in</p>	<p>The Final EIS has been updated to note populations adjacent to potentially utilized ports may have preexisting health disparities. Although environmental justice communities were identified using EJSCREEN, the Center for Disease Control and Prevention’s Environmental Justice Index (CDC EJI) was not utilized. The Final EIS acknowledges that certain environmental justice communities would experience a disproportionate adverse impact from elements of the Project, specifically around ports that would potentially be utilized by the Project.</p>

EPA Comment	Response
<p>the affected population and historical patterns of exposure to environmental hazards, to the extent such information is reasonably available. . . even if certain effects are not within the control or subject to the discretion of the agency proposing the action”.</p> <p>Recommended Action: BOEM should consider how relevant existing conditions in communities with EJ concerns across cumulative environmental, health, socioeconomic and climate stressors may ultimately lead to impacts that are disproportionately high and adverse. Please refer to a number of tools such as the Environmental Justice Screening and Mapping Tool (EJ Screen) and the Center for Disease Control and Prevention’s Environmental Justice Index to obtain information on pre-existing pollutant and health burdens that may inform the cumulative impacts analysis.</p>	
<p>Communities with EJ concerns are often disproportionately burdened by environmental hazards and stressors, unhealthy land uses, psychosocial stressors, and historical traumas, all of which drive environmental health disparities.</p> <p>Recommended Action: The FEIS should consider whether communities impacted by this project may already be experiencing existing pollution and social/health burdens. Additionally, the FEIS should further describe the health effects of impacts.</p> <p>BOEM should consult with potentially impacted communities and community organizations to develop a comprehensive stakeholder outreach/EJ public engagement plan for areas that may be impacted by the proposed action and provide an opportunity for affected communities to inform the project’s mitigation measures. This outreach plan should detail information on planned engagement</p>	<p>The Final EIS has been updated to note that populations adjacent to the existing ports that may be utilized for construction or O&amp;M phases may have preexisting health disparities. The Final EIS acknowledges that certain environmental justice communities would experience a disproportionate adverse impact from elements of the Project.</p> <p>Outreach to communities around the Project Area was conducted through the NEPA process. Public scoping meetings and public hearings following the release of the Draft EIS. Where State guidance indicated, linguistically isolated populations were included in the environmental justice identification process (e.g., New Jersey). Additionally, text has been added to the Final EIS to ensure Project-related information should be translated for linguistically isolated populations. BOEM is evaluating best management practices and strategies to address these concerns.</p>

EPA Comment	Response
<p>milestones and commitments to meetings with potentially impacted communities and community organizations. We encourage BOEM to develop communications written in plain language that can be understood by all affected community members. EPA has documented recommended approaches to engaging with communities with environmental justice concerns in the NEPA process in the report, Promising Practices for EJ Methodologies in NEPA Reviews, as well as additional resources to inform engagement with potentially impacted communities on EPA’s EJ and NEPA website, located at <a href="https://www.epa.gov/environmentaljustice/environmental-justice-and-national-environmentalpolicy-act">https://www.epa.gov/environmentaljustice/environmental-justice-and-national-environmentalpolicy-act</a>.</p> <p>BOEM should determine if linguistically isolated populations reside in the geographic areas impacted by the proposed project and should provide appropriate translation and interpretation services to ensure meaningful engagement. All outreach efforts should be documented in the EJ section of the DEIS. Often the best way to assess translation and interpretation needs is to connect with people who live in impacted communities, including local government officials and community-based non-governmental organizations. Public meetings should be accessible to all and scheduled at times that accommodate the greatest number of participants.</p>	
<p>The DEIS discussion regarding the consideration and ultimate dismissal of the use of 14 MW WTGs for the project (DEIS page 2-40) concludes that, “[b]ecause this alternative is not operationally, technically, and economically feasible and implementable, it was eliminated from further consideration.” The information provided does not fully explain why this size WTG is operationally infeasible.</p> <p>Recommended Action: Based on the brief analysis provided it appears</p>	<p>Thank you for your comment. A 14-MW wind turbine generator (WTG) is larger than what is proposed in the Project's design envelope defined in the Construction &amp; Operations Plan (COP) and evaluated in the EIS. Consideration of a larger capacity WTG would require an update to the COP, additional National Environmental Policy Act (NEPA) review, and reinitiation of the NEPA process. Thus, the impact of requiring larger capacity WTGs would effectively equate to the selection of Alternative A - No Action Alternative.</p>

EPA Comment	Response
<p>that decisions to eliminate consideration of the 14 MW WTG are largely related to the potential for delays caused by such a change. These schedule changes could result in negative consequences (affecting economic feasibility). It remains unclear from the discussion (because the information is identified in the discussion as business confidential) why a 14 MW WTG is technically or operationally infeasible. We recommend that the discussion be expanded to more fully explain this portion of the dismissal rationale.</p> <p>It would also be helpful to have more detailed information to explain the timeframe associated with the NYISO review of a modification request "...to redo the System Reliability Impact Studies and Class Year Facilities Studies."</p>	
<p>Burial of the transmission cable, particularly if the jetting method is employed, has the potential to suspend significant quantities of sediment. There is a specified requirement for a water quality monitoring plan (WQ-04, Appendix H, page H-6 or pdf 8), but no specified criteria other than "minimize impacts to sensitive habitats..." (WQ-01, page H6, pdf 8) or "...to the extent practicable" (GEN-08, page H-3, pdf 6).</p> <p>Recommended Action: We recommend that BOEM consider setting the monitoring limits/triggers for the proposed construction to reduce suspended solids as part of the construction plan development. EPA would appreciate the opportunity to review any standards that are developed as part of that effort.</p>	<p>Sunrise Wind has developed an Environmental Management and Construction Plan, which includes a Suspended Sediment and Water Quality Monitoring Plan (SSWQMP) in accordance with the Certificate of Environmental Compatibility and Public Need Conditions 182-189, 193. The SSWQMP includes plans for monitoring during construction, maintenance, and decommissioning activities that disturb sediments associated with the SRWEC-NYS corridor out 3 nautical miles (nm; 1.2 mi; 1.9 km) to the New York State Waters boundary. The plan specifies limits for total suspended solids and specific conditions depending on the excavation method used (e.g., jet trenching, hand trenching, sand wave leveling).</p>
<p>The DEIS provides general information to explain that portions of the export cable will require armoring to prevent cable damage where burial depths cannot be met due to substrate conditions or where other cables must be crossed.</p>	<p>As noted in the EIS, there are no exclusion zones, and fishermen will have charts of the locations of the cable emplacement and armoring. Section 3.14.5 indicates, "Cable, WTG, and OCS-DC locations would be indicated on nautical charts, helping to reduce the potential for</p>



EPA Comment	Response
<p>Recommended Action: We recommend that the discussion of cable armoring impacts be expanded to address the potential for fishing gear damage and whether mitigation for the armoring would be appropriate. We also recommend that the discussion address whether exclusion zones will need to be established to prevent damage to fishing gear. Because the information contained in the cable burial feasibility assessment was provided under confidential cover in Appendix G4 it is difficult to understand impacts associated with this element of the project. As this information speaks directly to project impacts, we recommend that the information be made accessible.</p>	<p>fishing gear interactions." Additionally, BOEM is proposing Sunrise Wind provide a scour protection plan.</p>
<p>2.1.2.2.6 Unexploded ordnances/munitions and explosives of concern (UXO/MEC) (p. 2-27). The DEIS identifies the possible presence of UXOs along the construction route and the potential need to move or detonate them. The DEIS correctly identifies UXOs as a potential threat to the health and safety of project participants. An explosion from an UXO could also adversely affect marine life.</p> <p>Recommended Action: EPA recommends that the FEIS identify this potential impact to whales and other marine life in the area and describe how Sunrise Wind will coordinate with NMFS and take the necessary precautionary steps when handling or detonating UXOs is anticipated. We also recommend that the FEIS more fully explain whether acoustic modeling or other analysis of potential acoustic/pressure effects on marine organisms, including but not limited to marine mammals was conducted for UXO/MEC detonation.</p>	<p>The potential for impacts to fish, turtles, and marine mammals from UXO/MEC clearance activities have been modeled and were discussed in the Draft EIS. The Final EIS includes updated exposure estimates and required avoidance and mitigation strategies.</p>
<p>Page: 404 Section 3.5.6.5.1.2.2 Impulsive Sound - MEC/UXO Clearance Activities</p> <p>Recommended Action: We recommend that the FEIS specifically</p>	<p>The Final EIS includes updated information on monitoring, avoidance, and mitigation strategies. Additional text describing some potential noise mitigation strategies to achieve the required 10 dB of broadband attenuation was added. However, the selection of sound</p>

EPA Comment	Response
<p>describe what type of noise attenuation will be utilized.</p>	<p>mitigation technologies has not been finalized and may depend on site-specific criteria.</p>
<p>The DEIS states at 3.5.2.1.4 - ICW-HDD (p. 3-82), “SAV beds including some eelgrass (<i>Zostera marina</i>) were found off the south shore of the channel.” But at 3.5.2.1.8 - Sensitive Taxa and Species of Concern (p.3-86) the DEIS states, “The benthic surveys did not identify any sensitive taxa, species of special concern, or nonnative taxa at any of the stations along the SWEC-NYS or the ICW-HDD; however, within the estuarine environment of the ICW HDD, the presence of seagrass beds, such as those observed along the south shore of the channel, are considered sensitive and ecologically important benthic habitat.” Without a graphic or more detailed description, it’s unclear where the eelgrass bed is in relation to the ICW HDD area.</p> <p>Recommended Action: EPA recommends the location of the eelgrass bed be better described or illustrated in the FEIS in relation to the proposed project.</p>	<p>The Final EIS characterized the eelgrass as potentially occurring in the Project Area and noted that it was found in 2018 but has not been confirmed in a more recent survey (2022). Sunrise Wind has described pre-Project surveys for the area that would confirm or deny its presence prior to surface disturbance.</p>
<p>EPA is concerned that the DEIS generalizes project impacts with broad, general metrics to compare impacts across alternatives (negligible, minor, moderate or major impacts). The broad metrics often result in differing alternatives being characterized as having similar impacts when they are not.</p> <p>Recommended Action: The NEPA analysis would benefit from less focus on the presentation of generalized impacts and more on the clear tradeoffs between alternatives as measured by impacts. Such an approach would provide greater emphasis on the design of Fisheries Habitat Impact Minimization Alternatives C-1 and C-2 that are intended to result in lowered impacts to benthic, finfish and EFH habitats, according to the DEIS at NMFS direction. Both alternatives</p>	<p>Sections 1.5 and 1.6 of the Final EIS provide an explanation of the impact analysis approach. Additional clarification was added to Table 2.4-1 and Table ES-2 to distinguish between the impacts of each action alternative alone and cumulative impacts, consistent with Chapter 3 template changes.</p> <p>Resource-specific impact level definitions are presented in each resource section, and the impacts of each alternative align with the appropriate impact level, as supported by the analysis. Alternatives reduced impacts on many resources; however, they did not always result in a change to the resource’s impact level conclusion. The minimization of impacts is identified and quantified where possible in the Final EIS.</p> <p>For the No Action Alternative analysis in the Chapter 3 resource</p>

EPA Comment	Response
<p>will reduce the number of WTGs and relocate project components (WTGs and their associated inter-array cables, scour protection and other project infrastructure) away from areas containing important complex bottom habitat.</p> <p>According to the DEIS, reducing the number of WTGs and associated cable and other infrastructure for Alternatives C-1 and C-2 in comparison to Alternatives B reduces the acres of long-term disturbance to complex bottom habitat by 22% to 50%, respectively. These impacts are not similar and highlight importance of a focus on specific project impacts in the analysis. As Alternatives C-1 and C-2 appear to meaningfully reduce project impacts we recommend that BOEM continue to work to expand upon the discussion of the differences in impact across alternatives rather than focus on categorizing the impacts with broad metrics. We also encourage BOEM to fully explain the decision-making rationale should a more damaging alternative ultimately be selected. These changes will benefit both the NEPA process and BOEM decision-making regarding alternatives. Lastly, we note that while consideration of future foreseeable development in the region is appropriate for assessment of cumulative impacts it remains inappropriate for direct comparisons between specific project alternatives.</p>	<p>sections, the Final EIS was updated to present the analysis of the ongoing non-offshore wind and ongoing offshore wind activities under a separate subheading from the planned non-offshore wind and offshore wind activities. The Proposed Action and action alternatives were also updated to present the cumulative impact analysis under a separate subheading.</p> <p>Under Section 3.7.9, Table 3.7-9, a comparison of habitat impacts for each alternative is presented for temporary and permanent impacts based on habitat type.</p>
<p>Section 1.6 Methodology for Assessing Impacts (p 1-13). The method used by BOEM in this DEIS and others for comparing alternative impacts using established “geographic analysis areas” (GAA) can, in many cases, limit opportunities for meaningful impact comparisons when the areas analyzed are grossly disproportionate to the project area. This can undermine the ability for the public to accurately compare anticipated project specific impacts of the various alternatives under consideration and often results in impacts</p>	<p>Comment noted. The GAAs presented in the Draft EIS are based on the geographical distribution of organisms that could be affected by Proposed Action and the cumulative effects of the other proposed offshore wind projects on the Mid-Atlantic Outer Continental Shelf. BOEM has reviewed the discussions of GAAs within the Final EIS and deemed them appropriate for analysis.</p>

EPA Comment	Response
<p>associated with the No Action Alternative being equal, or greater than, the Proposed Alternative. For example, the DEIS states that “Under the No Action Alternative, several thousand miles of cable would be added in the EFH, finfish, and invertebrate GAA, as well as within the benthic GAA, producing EMFs in the immediate vicinity of each cable during operations.” (p. 3-92). The project lease site is 86,769 acres and the cable corridor is 106 miles long by approximately 200 meters wide while the GAA that is being used to compare these impacts encompasses thousands of square miles within the Scotian Shelf, Northeast Shelf, and Southeast Shelf Large Marine Ecosystems (Appendix D). We recognize that there is site-specific impact information provided in Section 3 of the DEIS, however, even these comparisons are made to the subject GAA, and the reviewer is left to believe that impacts from not permitting this project to proceed would be greater than if it were, which seems implausible.</p> <p>Recommended Action: While we realize this is the approach being used for this DEIS, EPA recommends that for future projects BOEM develop more representative GAAs for making these alternative impact comparisons. This would allow the public to make a more informed and realistic assessment of impacts associated with the range of alternatives.</p>	
<p>Under Impacts of Alternative A – No Action on Benthic Resources (3.5.2.3), the DEIS states, “Under the No Action Alternative, several thousand miles of cable would be added in the EFH, finfish, and invertebrate GAA, as well as within the benthic GAA, producing EMFs in the immediate vicinity of each cable during operations.” (p 3-92). Given that this is an analysis on “benthic resources” only, not EFH, finfish, and invertebrates, which is covered separately, describing the magnitude of impacts associated with the GAA for EFH, finfish, and</p>	<p>The impact evaluation area was revised to just the Lease Area and buffered cable alignments. Clarification was also added on the purpose of the GAA to inform the general characterization of benthic habitats in the wider area. The text in Section 3.7 was revised to say, “For the assessment of future offshore activities, the analysis area was expanded to include an approximately 10-mile (16-km) buffer for characterization of the surrounding habitat, and prior and ongoing studies of Southern New England region were reviewed to</p>

EPA Comment	Response
<p>invertebrate does not seem appropriate as it exaggerates the potential impacts associated with that GAA versus the much smaller “Benthic Resource” GAA.</p> <p>Recommended Action: EPA recommends the comparisons of impacts in this section be limited to the Benthic Resource GAA. We note however that the Benthic Resource GAA inflates the area of the actual lease site with a 10-mile buffer around the site, more than doubling the lease site area.</p>	<p>describe the benthic environment. More specific analysis is supported by the site-specific surveys conducted within the SRWF Lease Area.”</p>
<p>EPA received the February 8, 2023 memorandum from NMFS to BOEM regarding “Additional Information Necessary to Initiate ESA Section 7 Consultation for the Sunrise Wind Project” and acknowledges that NMFS has identified a number of deficiencies in the Biological Assessment for the project that must be addressed. As EPA must complete Section 7 Consultation for both the air and NPDES permits for this project, we are invested in the outcome of this consultation.</p> <p>Recommended Action: EPA requests that BOEM identify how and when it will provide the additional information and clarifications requested by NMFS to initiate consultation. In particular, NMFS requested specific information about the NPDES permit application and more complete information on the anticipated impacts of the thermal plume and other pollutants. EPA is willing to cooperate with BOEM to ensure that the biological assessment is complete and fully evaluates the potential impacts of the offshore converter station on endangered species and critical habitat.</p>	<p>Updates are provided in the updated Biological Assessment.</p>
<p>The DEIS details numerous areas where additional work is either necessary or underway to evaluate and understand potential impacts of project construction and operation. Some of the areas highlighted in the DEIS where impacts remain under assessment (and studies are underway) include but are not limited to: the evaluation of EMF</p>	<p>As studies have been conducted, the Final EIS has been updated. Additional surveys may be conducted as part of permit conditions. See Section H.4 in Appendix H for permit conditions.</p>

EPA Comment	Response
<p>effects (p. 3-92), benthic impacts (through monitoring) (p. 3-94), impacts to epifaunal communities (p. 3-111), ongoing research on Cox’s Ledge to understand the distribution and habitat use of spawning cod (acoustic telemetry study), cold pool dynamics (p. 3-231), and a seasonal trawl survey by UMASS for project goal of 2 years of pre-construction monitoring (p. 3- 236).</p> <p>Recommended Action: We recognize and support the ongoing investigations/studies identified in the DEIS as they are directly related to developing an understanding of impacts caused by the proposed project. We recommend that the FEIS specifically detail when outstanding impact analysis work will be complete and how the results of the analysis will be integrated into BOEM decision-making for the Sunrise project. Responsible parties should also be identified. New information regarding impacts should be made public to the degree possible as part of the NEPA process for the project.</p>	
<p>3.5.2.3.2 Cumulative Impacts of the No Action Alternative (p. 3-90). The DEIS identifies potential impacts to the “Mid-Atlantic Bight cold pool” from wind turbine structures as an issue of emerging interest and ongoing research. However, there is no discussion of how this issue pertains to wind turbines sited in this general area. Such a discussion is provided in the DEIS at 3.4.2.5.2.2, Offshore Activities and Facilities (p. 3-53), which states, “The presence of structures is known to alter the vertical and horizontal mixing patterns of ocean waters which could influence water quality (e.g., water temperature, salinity, DO, turbidity) by changing the thermal stratification and mixing between surface and deep waters (e.g., Carpenter et al. 2016; Cazenave et al. 2016). Results from a recent BOEM (2021) hydrodynamic model of four different WTG build-out scenarios of the offshore MA/RI Lease Area found that offshore wind projects have the</p>	<p>Information on the cold pool was added under Sections 3.7.3.2 and 3.10.5.2.2 in a discussion about the presence of structures.</p>

EPA Comment	Response
<p>potential to alter local and regional physical oceanic processes (e.g., currents, temperature stratification), via their influence on currents from WTG foundations and by extracting energy from the wind.”</p> <p>Recommended Action: EPA recommends that the FEIS provide more information on the potential effects of wind turbines on the “cold pool” in this section as was presented in 3.4.2.5.2.2 and provide a research plan to address how the presence of wind turbines may alter the Mid-Atlantic Bight cold pool.</p>	
<p>The DEIS states at 3.5.2.1.7 SRWF Lease Area (p. 3-86), that “BOEM is currently funding a 3-year study (AT-19-08) examining movement patterns of Atlantic cod, black sea bass (<i>Centropristis striata</i>), and other species in the southern New England region, including the SRWF Lease Area. The study is being conducted by NMFS and a team comprising a state resource agency, a university, and a nonprofit organization (BOEM 15 2019). Given the level of concern raised about potential impacts on Cox Ledge and Atlantic cod, the discussion of potential effects presented in the following sections places emphasis on this and other species of particular concern.”</p> <p>Recommended Action: EPA supports BOEM funding this study and hopes that the results can inform this project and other wind projects. The DEIS at 3.5.5.1 (p. 3-196) also mentions this study and states that, “Peer-reviewed literature and reporting on this research would be considered in the Sunrise Wind Final EIS if available.” We urge BOEM to present any findings in the FEIS that result from this study, even if they have not yet been peer-reviewed.</p>	<p>Available results were included in the Final EIS.</p>
<p>The DEIS at 3-243 (PDF page 365) notes, “[f]or Alternative C-2, this analysis was expanded upon to relocate 12 WTG positions from the Priority Areas to the eastern side of the lease area in addition to</p>	<p>Results of surveys on the eastern side were not available when the Draft EIS was published; a new alternative was developed, and results from the eastern surveys were included in the Final EIS.</p>

EPA Comment	Response
<p>excluding development of the 8 WTG positions identified in Alternative C-1. This alternative assumes that habitat on the eastern side of the lease area is more suitable, but this assumption may change depending on the results of additional surveys conducted in this area during the summer of 2022.”</p> <p>Recommended Action: It is unclear why the summer 2022 survey results were not incorporated into the DEIS analysis. Regardless we encourage BOEM to include the survey results in the FEIS to the degree that they provide information that helps to inform the understanding of the impacts of the alternatives.</p>	
<p>The FEIS would benefit from a more robust consideration of climate change risks to the proposed action in the description of the affected environment.</p> <p>Recommended Action: We recommend that the discussion be expanded to include consideration of climate resiliency measures, particularly for infrastructure that may be vulnerable to the impacts associated with climate change (such as sea level rise, more frequent storms, etc.). This discussion would provide additional details regarding the durability of the proposed infrastructure (including WTGs and buried cables at all locations) in the face of more severe weather and more severe sea states.</p>	<p>Climate change has been added as an IPF for relevant resource areas. The OnCS-DC would be located well inland, above the 100-year and 500-year floodplain. The minimum equipment elevations at the OnCS-DC site exceed both the present-day and future worst-case Design Flood Elevation, as recommended by the American Society of Civil Engineers. The design also considers the potential effects of erosion, high winds, and ice. Additional information on meteorological conditions was added to Appendix B.</p>
<p>Recommended Action: We recommend that the FEIS provide detailed information on how frequently and at what scale cable maintenance/repair/replacement will occur, as well as the level of impacts associated with cable maintenance/repair/replacement.</p>	<p>The SRWEC and IAC would typically have no maintenance requirements unless a fault or failure was to occur. To evaluate the integrity of the assets, Sunrise Wind intends to conduct a bathymetry survey along the entirety of the cable routes immediately following installation (scope of installation contractor) 1 year after commissioning, 2–3 years after commissioning, and 5–8 years after commissioning. Based on the outcome of these</p>



EPA Comment	Response
	<p>assessments, several options may be undertaken, as feasible, permitted, and practical, such as remedial burial, addition of secondary protection (rock protection, rock bags or mattresses), and increased frequency of bathymetric surveys to assess reburial. Section 2.1.2.2.2.1 of the EIS discusses Sunrise Wind’s expectations for cable maintenance.</p>
<p>EPA appreciates the discussion of potential impacts to the Long Island Sole Source Aquifer and acknowledges best management practices to reduce potential impacts to surface, coastal, or ground water quality.</p> <p>Recommended Action: EPA supports the trenchless installation methods to avoid or minimize impacts to water quality. We further recommend efforts be made to minimize impacts to sensitive environmental resources such as complex benthic habitat, submerged aquatic vegetation and wetlands. This includes careful consideration of timing of surveys conducted prior to construction to avoid and reduce impacts to these resources. EPA also recommends that the DEIS indicate how the Project might affect current efforts to preserve the quality of water resources (for example as outlined by the Carmans River Conservation and Management Plan). We also recommend that the DEIS include a summary table that clearly demonstrates acreage of sensitive habitat impacted by each alternative to facilitate a meaningful comparison.</p>	<p>Efforts to protect water resources and sensitive habitats were added to the Final EIS, and the acreage of sensitive habitat for applicable resources will be included. Additional discussion related to the Carmans River has been added to Section 3.5.6.1. Areas of complex habitat have been prioritized and were used in the siting of the WTGs in Alternative C. Efforts will be made to reduce the number of boulders that would require relocating, and relocation methods will strive to minimally disturb boulders and relocate them as close to the original location as possible. Several tables with comparative numbers for habitat types are in Section 3.7, <i>Benthic Resources</i>. Concerning wetlands, Coastal Habitats Table 3.9-4 (discussed in Section 3.9.4) indicates acres of impacts to each designated area, which does not change under the alternatives, except for the No Action Alternative, as described in the text. Surveys for sandplain gerardia and seabeach amaranth are addressed in the Biological Assessment, including "Time-of-year restrictions for certain work activities (e.g., HDD conduit stringing) will be applied to the extent practicable to avoid or minimize direct impacts to sandplain gerardia, seabeach amaranth, and their habitat during construction of the landfall and onshore facilities. If work is anticipated to occur outside these time-of-year restriction periods, coordination with state and federal agencies will be accomplished to develop construction monitoring and impact minimization or mitigation plans, as appropriate." The Final EIS was revised based on the final</p>

EPA Comment	Response
	Biological Assessment/Biological Opinions. Surveys for birds, bats, and other wildlife are addressed in each corresponding chapter, as well as the Biological Assessment.
<p>Based on our review more could be done to improve access supporting information referenced in the analysis. Throughout the reader is directed to supporting information presented in separate documents but these references are generally provided with no active direct link to the cited reference.</p> <p>Recommended Action: While we understand the need to reference supporting information to meet established page limits, we recommend that BOEM could take steps to better bridge access to information referenced in the main body of the EIS and supporting documents such as the COP or Appendices to the EIS. We continue to recommend the use of hyperlinks directly to the information being referenced. Ideally references would be hyperlinked, so that a reviewer can click on the referenced information link (e.g., a COP table) and be taken directly to that table in a DEIS appendix. In the absence of a hyperlink, we appreciate the instances where specific source document information including page number, etc. is provided in the body of the EIS.</p>	Thank you for your comment. We have made a good-faith effort to provide sources of information throughout the EIS. Sections, tables, and figures of the COP are referenced in the text when applicable. Tables and figures within the EIS are linked for the reader’s ease.
<p>Table 3.4.1-5. “Comparison of Alternative Impacts on Water Quality” (p. 3-29) pertains to air quality</p> <p>Recommended Action: Correct the table title.</p>	The title of Table 3.4-10 was corrected (previously Table 3.4.1-5 in the Draft EIS)
The DEIS repeats the same information below on pages 3-689 and 3-690: “The proposed Project’s Onshore Facilities would be located in Suffolk County, which has many summer tourism destinations and approximately 980 mi (1577 km) of coastline, including Montauk, the Hamptons, and Fire Island (Bolger 2016). Southampton is a popular	Section 3.21.1 has been revised to remove the redundant paragraph.

EPA Comment	Response
<p>recreation and tourism destination that has two of America’s ten top-rated golf courses, shops and attractions, and white sand beaches (ICF 2012). The Fire Island National Seashore encompasses 19,579 acres (7,923 hectares) of protected land that features high dunes, forestland, undeveloped sandy beaches, and abundant wildlife that attracts large numbers of visitors, including surfers, nature enthusiasts, campers, boaters, and beachgoers (ICF 2012; Bolger 2016). This area also houses the Fire Island Lighthouse, 17 listed on the National Register of Historic Places, a culturally and historically significant monument (NPS 2018).”</p> <p>Recommended Action: The last sentence of the redundant paragraph on page 3-690 (“In 2017, 681,518 people visited National Park Service sites on the Fire Island National Seashore.”) could simply be retained in the text of the previous paragraph.</p>	
<p>Section 2.1.2.3 Operations and Maintenance only has one sub-section, 2.1.2.3.1 Onshore Activities and Facilities.</p> <p>Recommended Action: Please consider whether operations and maintenance are relevant to offshore activities and facilities as well. It seems that Section 2.1.2.4 Offshore Activities and Facilities, should be reassigned as 2.1.2.3.2. and the numbering for the subsections adjusted as well.</p>	<p>The formatting inconsistencies were updated.</p>
<p>Page: 55 2.1 Alternatives Analyzed in Detail “Alternatives considered but dismissed from detailed analysis and the rationale for their dismissal are described in Table 2.1-1.”</p> <p>Recommended Action: Dismissed alternatives do not appear to be described in Table 2.1-1 as indicated. This should read Table 2.2-1.</p>	<p>The table number has been updated appropriately.</p>

EPA Comment	Response
<p>On Table 2.4.1 (page 2-49, pdf page 102) under the Benthic Resources section, Alternative C-2 has the exact same description as Alternative C-1.</p> <p>Recommended Action: We recommend that the tables be reviewed for accuracy and question whether the Alternative C-2 description should also mention that an additional 12 WTG positions would be removed from the Priority Areas and relocated to the eastern side of the lease area.</p>	<p>Thank you for your comment. Table 2.4-1 has been revised to indicate the correct number of WTGs.</p>

**O.4.1.3. United States Coast Guard**

**Table O-4. Responses to Comments from USCG [BOEM-2022-0071-0167]**

USCG Comment	Response
<p>The DEIS adequately evaluates the impacts to Navigation and Vessel Traffic and USCG missions, which resulted in an assessment of minor to moderate adverse impacts. The USCG does not oppose Alternatives B, C-1, and C-2, noting the Project would maintain a uniform east-west and north-south grid pattern of 1 x 1 nautical mile spacing between turbines in each alternative. It is especially imperative Alternatives C-1 and C-2 maintain a clear grid pattern of uniform lines of orientation as these alternatives call for the potential exclusion of eight to twelve turbines, which may lead to reduced uniformity and increased risk to vessel navigation. As concluded in the USCG's Massachusetts/Rhode Island (MA/RI) Port Access Route Study, a key means to mitigate impacts to Navigation and Vessel Traffic and USCG missions is for each wind farm across the entire MA/RI wind energy area to be organized in straight rows and columns, creating a grid pattern consisting of at least three lines of orientation. Common turbine spacing and layout help facilitate navigation safety, consistent and continuous marking and lighting, search and rescue, and other uses, such as commercial and recreational fishing.</p>	<p>Thank you for your comment. The 1-by-1 nautical mile grid spacing was considered in the alternative analysis, and we have incorporated your comments into Sections 3.19.6.1.2, 3.19.6.2.2, 3.19.7.1.2, and 3.19.7.2.2.</p>
<p>The USCG recommends all Applicant-Proposed Measures (Table H-1) and Potential Mitigation and Monitoring Measures (Table H-2) of Appendix H: Mitigation and Monitoring, be made mandatory with the following exceptions: a) The USCG does not concur with the entire description of Other Agency-Proposed Mitigation Measure No. 5, Safety Zone During Cable Installation on page H-67 of Appendix H: Mitigation and Monitoring. The USCG supports all elements of the mitigation measure description</p>	<p>Thank you for your comment. a) APM No. 5, Safety Zone During Cable Installation, has been removed from the Final EIS and Appendix H. b) All references to NVIC 01-19 are correct. c) USCG was added as an enforcing agency to the APM, stating "No permanent exclusion zones during operation of the SRWF, so both Project and non-Project vessels will be free to navigate within, or close to, the SRWF." Previously, this was labeled as GEN-18, and it is</p>

USCG Comment	Response
<p>except "establishing a safety zone around the cable laying vessel(s)". The USCG does not intend to establish safety zones around cable laying installation vessels and the authority should not be used as a measure to mitigate potential impacts from cable installation operations.</p> <p>b) The USCG requests all references to Navigation and Vessel Inspection Circular (NVIC) 02-07 be replaced with the most recent version; NVIC 01-19.</p> <p>c) The USCG requests the Anticipated Enforcement Agency listed for Applicant-Proposed Measure GEN-18 on page H-4 of Appendix H: Mitigation and Monitoring, include the USCG as the agency with statutory authority for establishing exclusionary areas and safety zones on the Outer Continental Shelf.</p>	<p>now labeled as GEN-25.</p>
<p>Additionally, the USCG recommends the following:</p> <p>a) Safety Zones: The Commander, Coast Guard First District may consider the establishment of safety zones in the Project area on a case-by-case basis. Safety zones will not be granted for the sole purpose of keeping project construction on schedule and the authority should not be used as a mitigation measure when considering potential risks and impacts.</p>	<p>Comment noted. This will not be used as a mitigation measure.</p>
<p>Additionally, the USCG recommends the following:</p> <p>b) Post Record of Decision Involvement: The USCG requests timely access to construction plans, such as Facility Design Reports and/or Fabrication Installation Reports for the purpose of identifying activities impacting Navigation and Vessel Traffic and USCG missions on the Marine Transportation System, especially Cable Burial Plans and their associated risk and feasibility assessments. Early access to these documents may prevent conflicts with planned activities.</p>	<p>Thank you for your comment. Language has been inserted into Section 3.19.5.1.2 of the Final EIS.</p>

USCG Comment	Response
<p>Additionally, the USCG recommends the following:                      c) Amending Mitigations: The USCG requests the opportunity to suggest amendments to approved mitigations and terms and conditions at any time before, during, or after installation of the wind farm should material facts or circumstances come to light that were either unforeseen or were not reasonably available at the time these conditions were issued.</p>	<p>The USCG can review mitigations and terms and conditions during the review of the EIS in all stages and will have the opportunity to review the terms and conditions before any approvals.</p>
<p>Additionally, the USCG recommends the following:                      d) Re-Evaluation: The USCG requests the opportunity to re-evaluate any future mitigation analyses required by the Department of Interior, especially related to Navigation and Vessel Traffic, USCG missions, and Other Uses, such as National Security and Military Activities, Aviation and Air Traffic, and Radar Systems.</p>	<p>The USCG can review mitigations and terms and conditions during the review of the EIS in all stages and will have the opportunity to review the terms and conditions before any approvals.</p>

**O.4.1.4. National Parks Service**

**Table O-5. Responses to Comments from National Parks Service [BOEM-2022-0071-0255]**

NPS Comment	Response
<p>For the project to proceed as proposed, the NPS must issue special park use permits to authorize the construction of the conduit and power cable in FIMS waters and lands under waters, and the transit of the project materials and equipment barge through the intercoastal waterway water column under NPS jurisdiction. The NPS must also issue a ten-year renewable right-of-way (ROW) permit for the power cable conduit.</p>	<p>Thank you for your comment. We have revised the Final EIS with language provided by the National Parks Service (NPS) to clarify what permits are necessary. This language can be found in the <i>Executive Summary</i>, Section 1.2, <i>Purpose and Need</i>, Section 2.1, <i>Alternatives</i>, and Appendix A, <i>Required Environmental Permits and Consultations</i>.</p>
<p>The NPS has from the beginning of this project made clear that we intend to rely on BOEM’s environmental impact statement (EIS) and record of decision (ROD) for our decision on whether to issue the special use permits and ROW permit described above. We have also from the beginning raised our concerns about the information that would need to be analyzed and disclosed in the EIS. However, this DEIS lacks certain necessary information.</p>	<p>Thank you for your comment. We have revised the Final EIS with language provided by the NPS to clarify what permits are necessary. This language can be found in the <i>Executive Summary</i>, Section 1.2, <i>Purpose and Need</i>, Section 2.1, <i>Alternatives</i>, and Appendix A, <i>Required Environmental Permits and Consultations</i>.</p>
<p>Overall, the NPS does not have sufficient information to make an informed decision on the ROW and special use permits. We deemed the applications for the ROW and the special use permits from the developer sufficient to proceed to their consideration. The DEIS was supposed to analyze the specific activities proposed in the permit applications under NEPA and Section 106 of the NHPA and analyze and disclose the environmental effects of these proposed activities. The DEIS does not appear to have adequately done so with respect to the activities subject to NPS permitting decisions. To summarize our main concerns:</p> <p>The alternative landfall sites analysis does not contain adequate information on the reasons other landfall locations were dismissed</p>	<p>Thank you for your comment. Additional information has been added to Chapter 2 of the Final EIS to address your concerns.</p>



NPS Comment	Response
<p>from further consideration. Among other issues, the need for a barge under the proposed action was never included in the analysis of alternative landfall locations.</p> <ul style="list-style-type: none"> <li>• The proposed action description and analysis of effects is insufficient:                             <ul style="list-style-type: none"> <li>○ In analyzing the impacts on recreation at the proposed landfall; and</li> <li>○ In describing the following project elements regarding:                                     <ul style="list-style-type: none"> <li>○ The cable landfall, and</li> <li>○ The use of the proposed barge.</li> </ul> </li> </ul> </li> <li>• The reasonably foreseeable actions under Alternative A are incorrect and include actions the NPS is legally unable to authorize.</li> <li>• Analysis of impacts to FIIS and the Otis Pike Fire Island High Dunes Wilderness (Wilderness) have not been adequately disclosed.</li> </ul>	
<p>As you know, the EIS must “[e]valuate reasonable alternatives to the proposed action, and, for alternatives that the agency eliminated from detailed study, briefly discuss the reasons for their elimination.” 40 Code of Federal Regulations (C.F.R.) § 1502.14(a); see also 43 C.F.R. § 46.415(b). Reasonable alternatives must be “technically and economically practical or feasible and meet the purpose and need of the proposed action.” 43 C.F.R. § 46.420(b); see also 40 C.F.R. § 1508.1(z). While acknowledging that only a brief discussion of reasons for eliminating alternatives from detailed study is required, the NPS is concerned that the DEIS does not sufficiently address alternative landfall sites, including landfall sites that would avoid traversing FIIS. The explanation and reasons why those alternative landfall sites were eliminated should be expanded or instead one or more alternative landfall sites should be treated as Alternatives in Chapters 2 and 3 of</p>	<p>Thank you for your comment. Additional information has been added to Chapter 2 regarding why these alternative landfall sites were dismissed from further consideration.</p>

NPS Comment	Response
<p>the EIS.</p>	
<p>The project developers in discussions with the NPS, and the material in the DEIS provided information describing five other landfall locations in addition to Smith Point County Park and its two eliminated landfall variations within the County Park. The five alternate landfall sites are:</p> <ol style="list-style-type: none"> <li>1. Village of Quogue Beach, Town of Brookhaven, NY</li> <li>2. Coopers Beach, Southampton, NY</li> <li>3. Rogers Beach, Westhampton, NY</li> <li>4. Bellport Bay, Town of Brookhaven, NY</li> <li>5. Bluepoint Marina / Corey Beach, Town of Brookhaven, NY</li> </ol> <p>Section 2.2 of the DEIS and Appendix P to the DEIS, which contains Section 404(b)(1) analysis by the U.S. Army Corps of Engineers (USACE), briefly address the alternative landfall sites considered and excluded from further consideration, as does Section 3.6.5 “Land Use and Coastal Infrastructure” of the DEIS, though with fewer specifics. According to the DEIS, the Bellport Bay and Bluepoint Marina sites were eliminated from further consideration as they would have likely required crossing of FISS through the Wilderness area. This would not be allowed, rendering these landfall sites infeasible. We therefore agree with eliminating these two sites from further consideration.</p>	<p>Thank you for your comment. Additional information on these landfall sites was added to Chapter 2, Section 2.2.</p>
<p>However, the rationales for eliminating from consideration the other three sites, i.e., Village of Quogue Beach, Coopers Beach and Rogers Beach, merit further discussion. Those sites were each described as having certain exclusionary characteristics, without quantifying the nature of those exclusionary reasons. For instance, all three were described as including “the fact that the onshore portion of the transmission cable would be longer than the preferred alternative” (DEIS, Appendix P under Logistics in Table P-2 on page P-5). However, information on the lengths of these onshore cables was not provided. The map in Appendix P (Map P-2 on page P-10) shows the general</p>	<p>The information provided in Appendix P to the Final EIS specifically supports the Section 404(b)(1) analysis conducted by the United States Army Corps of Engineers (USACE). Detailed route feasibility is not completed for all landfall options at an early stage, particularly if a landfall location is not advanced for further consideration. While detailed routes were not evaluated, the general distance between the landfall and the Holbrook Substation provides indicative distances. Each of the alternative landfall sites would have an onshore cable route to the Holbrook Substation that is at least 25 mi (40.2 km; Rogers Beach is approximately 25 mi [40.2 km] from</p>

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<p>locations of each of the alternatives dropped from consideration but not their onshore routes. If the alternative can be characterized as “longer”, the exact length and route must be known. We don’t know how much longer each of the alternative transmission cable routes would be. We don’t know what challenges or opportunities each route might present. The exact mileage, route and route characteristics that could impact siting should be provided.</p>	<p>Holbrook, Quogue Beach is approximately 30 mi [48.2 km], and Coopers Beach is approximately 38 mi [61.2 km]). Given these indicative distances, the routes would be 50 percent to 125 percent longer than the route between Smith Point County Park and the Holbrook Substation, which is 17 mi (27.4 km). This information was added to Section 2.2 in Table 2.2-2.</p>
<p>Similar reasoning was used under Cost, “This landfall option would result in a longer onshore transmission cable route when compared to the preferred alternative; therefore, would result in higher overall costs” (Appendix P in Table P-2 on page P-5). Again, no information is presented on the cost to make a comparison. If the alternative can be characterized as “higher cost”, at minimum the approximate cost must be known to conclude that it was higher. An estimate of the cost of each alternative should be provided; that information speaks directly to the economic feasibility of potential landfall sites.</p>	<p>Detailed cost estimates are not generated for all routes at an early stage, particularly if a landfall location is not advanced for further consideration. Onshore transmission cable costs, particularly at the earlier stages of alternatives analysis and route feasibility, are estimated on a per-mile basis. Given that the routes are approximately 50 percent to 125 percent longer than the route associated with the proposed landfall from Smith Point County Park, the costs would also be approximately 50 to 125 percent higher. This information was added to Section 2.2 in Table 2.2-2.</p>
<p>The assessment of impacts to the aquatic environment used similar reasoning, “Site excluded due to the fact this route would result in greater terrestrial disturbance due to the increased length of the transmission route and/or potential conflicts with existing aquatic resources and anthropogenic uses” (Appendix P in Table P-2 on page P-7). The first part of this explanation is again tied to the length of the onshore route without information on the length of that route. The second part refers to potential conflicts with existing aquatic resources without an explanation of what the potential conflicts might be or even a description of the existing aquatic resources particular to each alternative. The final part of this explanation refers to anthropogenic uses, again without an explanation of human uses at each location or a comparison of said uses. As above, some analysis must have been done to come to these conclusions. That analysis should be</p>	<p>Appendix P of the Final EIS includes the Section 404(b)(1) analysis conducted by the USACE. Table 2.2-2 in Chapter 2 was added to support NPS decisions on alternative route feasibility, and details were added. However, detailed route feasibility was not completed for landfall sites that were excluded from further consideration based on potential conflicts with existing aquatic resources, such as wetlands, streams, or other sensitive resources, or anthropogenic uses, such as the proximity to cultural or historic resources and proximity to the number of residences. These conflicts have been identified as potential, as additional site-specific surveys were not completed once the alternative route had been determined not to be a feasible option. Part of this determination included the length of the proposed cable route. Additional information on the length of the onshore transmission cable has been added to Section 2.2 of the</p>

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summarized in the EIS.	EIS. Further analysis of routes that were not considered are not included in the EIS because they are not a part of the action put forward by Sunrise Wind and are not described in the COP.
<p>The last two categories that the USACE analyzed potentially point to differences between alternative landfall sites, but here too, not enough information is presented. Under “Impacts to USACE Civil Works Projects,” the table lists the two excluded Smith Point County Park options as “Similar proximity to [the Fire Island Inlet to Montauk Point Project] (FIMP) as preferred Landfall [horizontal directional drilling] HDD” at Smith Point County Park (Appendix P in Table P-2 on page P-8). But there is no description that we could find of the proximity to FIMP for the preferred landfall site, making it difficult for the reader to understand how the preferred landfall compares to the other alternatives in its proximity to FIMP.</p>	<p>The entry location for the Landfall HDD will be in a parking lot 755 ft (230 m) landward from the FIMP. The exit location for the Landfall HDD will be 2,525 ft (770 m) seaward from the FIMP. The cable will be installed at a depth of approximately 60 ft (18 m; NAVD 88) below the 0’ datum where the FIMP is located. The entry location for Landfall HDD B would be located adjacent to the proposed Landfall HDD entry location (approximately 495 ft [151 m] landward of the FIMP), and the exit location and depth for Landfall HDD B would be the same as the proposed Landfall HDD (approximately 2,525 ft [770 m] seaward from the FIMP and approximately 60 ft [18 m] below the 0’ datum). The entry location for Landfall HDD C would be located just west of the proposed Landfall HDD entry location (approximately 541 ft [165 m] landward of the FIMP), and the exit location for Landfall HDD C would be just west of the proposed Landfall HDD (approximately 1699 ft [518 m] seaward from the FIMP). The depth of Landfall HDD C would also likely be approximately 60 ft (18 m) below the 0’ datum.</p> <p>The other potential landfall locations are also located in parking lots, and thus, entry locations for those HDDs would likely be 272-374 ft (83-114 m) landward from the FIMP. HDD exit locations, while not specifically designed, would also likely be 3,280-4,921 ft (1,000-1,500 m) seaward from the FIMP but would be restricted by the location of sand borrow areas. Detailed geophysical and geotechnical (G&amp;G) surveys or route engineering have not been conducted at other potential landfall locations, and thus, precise lengths, locations, and depths cannot be determined. Without detailed G&amp;G surveys and further engineering design, it also cannot be concluded that a single</p>

NPS Comment	Response
	<p>HDD would be able to be used. Up to three drills may need to occur at other potential landfall locations (i.e., one for each of the conduits and a spare, as was originally proposed for the Landfall HDD). This information has been added to Chapter 2 and Section 3.18.5.1.1.</p>
<p>This Civil Works section states, “The proposed landfall at (Coopers and Rogers Beach) has the potential to impact existing sand borrow areas, as well as civil works beach renourishment projects such as FIMP” (Appendix P in Table P-2 on page P-8). But this “potential” to impact sand borrow areas is not described at all, nor are possible impacts or proximity to FIMP. The Village of Quogue Beach is described as, “The proposed landfall at Quogue Beach would not impact any Civil Works Borrow Areas, however, will potentially impact civil works beach renourishment projects such as FIMP” (Appendix P in Table P-2 on page P-8). Again, there is no information provided on any potential impacts or proximity to FIMP.</p>	<p>Additional information was added to Chapter 2 in Section 2.2 to address these comments.</p>
<p>The final category USACE analyzed was “Impacts to Special Aquatic Sites.” The table lists the two excluded Smith Point County Park options as “Similar impacts as preferred Landfall HDD” (Appendix P in Table P-2 on page P-8). Appendix P defines special aquatic sites as Impacts to Special Aquatic Sites (wetlands, mudflats, vegetated shallows etc.) and lists “none” for such sites at the preferred landfall location at Smith Point County Park, (Appendix P in Table P-1 on page P-4). But the definition of “Impacts to Special Aquatic Sites” seems to have expanded in analyzing the other alternatives, “In the offshore vicinity of Cooper’s Beach there are constraints that limit potential cable placement including mapped shipwrecks and a scuba-diving area” (Appendix P in Table P-2 on page P-8). The analysis fails to include the swimming, surfing and fishing areas on the ocean side that could be impacted by the proposed landfall cable construction and the</p>	<p>The information included in Special Aquatic Sites in Table P-2 of Appendix P is defined by USACE to include wetlands, mudflats, and vegetated shallows and is focused on discussing impacts on the aquatic environment. This analysis of landfalls by the Applicant did not include swimming, surfing, fishing, or scuba diving activities in the area. Please see Section 3.21.5.1 of the Final EIS for further discussion of construction impacts on the recreation and tourism activities described in the comment.</p>

NPS Comment	Response
<p>scuba-diving area on the bay side at Smith Point County Park that could be impacted by the barge activities. There are no impacts to special aquatic sites listed for Rogers Beach.</p>	
<p>The analysis in Section 2.2 of the DEIS also calls into question the decision to drop all the other landfall alternatives. “The Smith Point County Park landfall site would result in the least disturbance to recreational and commercial fisheries, recreational boating, and impacts to designated wilderness areas” (DEIS at 3-619). The analysis in the DEIS does not contain sufficient information to support this conclusion. While it is true that the Bellport Bay and Bluepoint Marina / Corey Beach sites proposed by the developers would have traversed the wilderness area, the other three dropped alternative locations are much farther away from the Wilderness area than Smith Point County Park which is immediately adjacent. There is no comparison of the alternatives with the proposed landfall at Smith Point County Park presented in the DEIS for recreational and commercial fisheries, and recreational boating. Further, it is unclear why recreational boating has been considered, but other forms of recreation apparently have not been considered. This analysis should address all forms of recreational use, especially beach use as beach use is common across all sites. The NPS asks that the analysis to conclude that the proposed location “would result in the least disturbance” be expressly addressed in the EIS.</p>	<p>Thank you for your comment. Since the development of the Draft EIS, BOEM has worked with NPS to address these concerns and has added Table 2.2-2 and additional discussion in Section 2.2 and Chapter 3 about the alternative landfall locations considered and reasons for dismissal. The recreational impacts of the alternative landfall sites were not further discussed in Section 2.2 because they were dismissed as potential alternatives for different reasons. They were not a factor in dismissing the alternatives and were therefore not analyzed and discussed further once the sites were dismissed from consideration.</p>
<p>Quantified information tied to the qualified statements above must have been calculated and known in order to characterize a site route as “longer than” or “higher cost than.” Data must have been considered in order to determine certain landfall sites had the “potential to impact” or would generate the “least disturbance.” Without these details, the NPS lacks relevant environmental information that informs whether the Village of Quogue Beach,</p>	<p>Additional information regarding the route lengths has been added to Chapter 2, Section 2.2. Detailed information regarding the costs is not available since these sites were excluded for other reasons initially.</p>

NPS Comment	Response
<p>Coopers Beach, and Rogers Beach landfall sites are appropriately eliminated from further consideration or should be analyzed in more detail as an Alternative carried forward in the EIS.</p>	
<p>One of the critical elements of the proposed landfall location at Smith Point County Park is the need for a barge to haul heavy machinery, equipment, and supplies to and from Smith Point County Park parking lot and the attendant landfalls for the barge on each side of the Intercoastal Waterway. The DEIS description of the proposed action and the analysis of the impacts of the proposed landfall location failed to meaningfully include this required element of the project. The comparison of potential landfall alternatives also failed to include this element even though it has a direct effect on the cost of the alternative and potential impacts to aquatic communities, as well as the potential for hazardous spills and possible attendant impacts to the Wilderness should an accident occur.</p>	<p>A description of the barge activities has been added to the Final EIS in Chapter 2 under the Proposed Action (Section 2.1.2). It is unknown if other alternative landfall sites would require a barge; this was addressed in Table 2.2-2.</p>
<p>As far as the NPS is aware, none of the other alternative locations need a barge and landing locations. Since the cost of the onshore power cable to the substation was listed as a contributing factor to the other landfall alternatives being eliminated from consideration, the cost of the barge, fuel, and barge landing locations creation should be included when considering the cost of landfall at the Smith Point County Park location.</p>	<p>A potential landfall at the Village of Quogue Beach would require the use of the Quogue Bridge to transport HDD equipment to the barrier island. Based on a review of information from Suffolk County, Quogue Bridge has a posted load weight limit of 20 tons, and thus, some equipment would not be able to cross the bridge. However, the barrier island in this area is also accessible by the Beach Lane Bridge and the West Bay Bridge, both located in the town of Westhampton Beach, neither of which currently has a posted weight limit. A potential landfall at Rogers Beach would also require the use of the Beach Lane Bridge or the West Bay Bridge. Discussions with relevant authorities would be required to confirm the transport of oversized or overweight loads, but it is assumed that neither location would likely require the use of a barge system. Coopers Beach is not located on a barrier island and thus would not require the use of a barge system.</p>

NPS Comment	Response
	The costs for the Smith Point Landfall do consider the use of the temporary landing structure and the barge use system.
In order that the NPS can understand the effects of its decision on whether to issue the ROW and special use permits (SUPs), we need either additional analysis confirming that the Village of Quogue Beach, Coopers Beach, and Rogers Beach landfall sites are impracticable and/or infeasible or, if one or more alternative sites are feasible and practical, then we need a full alternative analysis of a cable landing at one or more of those landfall sites. This would include fuller factual details on the alternatives and the reasons to eliminate or carry forward those alternatives, as well as the level of analysis needed in order to make an informed decision, much of which is described elsewhere in this letter. How this would be carried out, whether by a supplemental DEIS, a new appendix in the Final EIS, or some other process would need to be coordinated.	This information was added to Table 2.2-2 in Section 2.2.
The NPS believes the proposed action description and analysis of effects is insufficient in addressing 1) the impacts on recreation; 2) the cable landfall construction and impacts both in Smith Point County Park and in FIIS waters; and 3) the need for and use of the barge as a component of the project at the proposed location. We address each below	Thank you for your comment. Your concerns outlined below are addressed throughout the Final EIS and within this comment matrix.
The assessment of impacts on recreation and tourism at the proposed landfall is inadequate in the DEIS. There seems to be a disconnect in how accessible Smith Point County Park and FIIS would be once construction started and the means the recreating public could use to gain access to the Smith Point County Park and the National Seashore.	Pedestrian and public access to the parking lot and park facilities will be maintained throughout construction at Smith Point County Park. Access will be maintained for continual pedestrian and vehicular access to park amenities within Smith Point County Park on Fire Island, the Smith Point Marina on the mainland, and all other existing public access areas. Similarly, Sunrise Wind's use of the Temporary Equipment efforts will not prevent the public from accessing the fishing pier on Smith County Park unless temporarily necessary for safety purposes (e.g., movement of equipment near an



NPS Comment	Response
	<p>access point to the fishing pier).</p> <p>To further expand on this information, Sunrise Wind has committed to maintaining access to all roads and the Smith Point County Park parking lot during construction. Therefore, no road closures will be required. Only an occasional and short-term interruption of a few minutes is possible during certain points of the construction to maintain safe operations.</p> <p>The work area/Limit of Disturbance located in the fenced area west of the Smith Point Bridge, where the new ICW HDD will exit, is the only area that will be closed during construction activities. Closures will be limited to the offseason and will overlap with locations that will be permanently impacted by the new Smith Point Bridge. The public will still have access to the Fire Island Wilderness Visitors Center and other trails and areas west of the bridge during construction. Sunrise Wind has also committed to avoiding all work within Suffolk County Parks during the summer tourist season (Memorial Day to Labor Day); therefore, impacts to recreational users will be temporary and minimal.</p>
<p>In regard to recreation and tourism, the DEIS states: “Some recreation and tourism activities occur year-round, and there is the potential for activities to occur that affect public access. Public access to Smith County Park would not be allowed during construction activities. Additionally, public access could be limited to specific areas of the Fire Island National Seashore. However, the level of this impact would be directly associated with the time of year that construction activities would occur” (DEIS at 3-699). It is not apparent in the DEIS that BOEM is aware that vehicle access to Smith Point County Park and FIIS in this area is limited to the Smith Point Bridge on the William Floyd Parkway. The bridge essentially dead ends at Smith Point County Park. If public access to the Smith Point County Park would not be allowed during</p>	<p>Section 3.21.5.1.1 has been revised to clarify that Sunrise Wind has committed to maintaining public access to all facilities at Smith Point County Park and Smith Point Marina unless temporarily necessary for safety purposes, and therefore, access to NPS-managed areas would be maintained. Construction activities may result in a reduction of access to some parking areas or changes in traffic flow but would not prevent access to Smith Point County Park or the recreation and tourism areas that are accessed from this point.</p>

NPS Comment	Response
<p>construction activities, then access to the County Park, the Wilderness Area, and other parts of FIIS would be essentially prohibited. Surfing, hiking, birding, and photography are year-round activities at FIIS, with fishing and hunting seasonally restricted to the areas of the FIIS accessible from Smith Point County Park. Additionally, the Wilderness Visitor Center (adjacent to Smith Point) is one of only two NPS sites open for visitors year-round on FIIS. While there are ferries and other water-borne transportation options, they run most often during the busier times of the year and would not disembark in this area. The closest ferry and water taxi service would be to Watch Hill which is 7 miles away from the Wilderness Visitor Center/Smith Point area. Neither of those provide service after Columbus Day. These matters should be clarified in the EIS so that the NPS and the public have the relevant information necessary to understand the proposed project's effects on recreation and visitor access.</p>	
<p>In a separate section regarding land use and coastal infrastructure and discussing proposed construction activities, the DEIS says, "Access to the landfall area would be maintained through Smith Point County Park and would not traverse portions of the Otis Pike Wilderness area or other portions of the Fire Island National Seashore. Vehicles would include heavy equipment, such as excavators, cranes, dump trucks, and paving equipment" (DEIS at 3-630). This passage from the DEIS is confusing and should be revised for clarity. Which equipment and vehicles would arrive by barge and which via the bridge? As we note above, in the absence of any discussion of the barge, one would assume that those vehicles would drive to the County Park. Secondly, "access to the landfall area would be maintained" appears to only refer to construction vehicles during most of the year as "Public access to Smith County Park would not be allowed during construction activities." Please clarify when and how the recreating public would</p>	<p>Text was added to Section 2.1.2.1.19 clarifying what equipment would be transported by barge and public access availability.</p>

NPS Comment	Response
<p>have access to the County Park and this side of FIIS outside of the summer season.</p>	
<p>The reason the barge is needed is because the Smith Point Bridge is no longer capable of the safe passage of heavy loads so the carrying capacity of the bridge has been lowered. The bridge must be replaced. Construction is reported to start in 2024 and conclude in 2027. The old bridge will remain in place while the new bridge is constructed, which means it will have a different footprint than the current bridge. According to the most recent material on the bridge replacement project from Suffolk County, NY, the new bridge will be built approximately 150 feet west of the current bridge. This would place it squarely within the footprint of the proposed westernmost work area and HDD landfall for the onshore transmission cable for the Sunrise Wind Project (DEIS at 3-618). There is also the question as to whether waterborne passage under the new bridge footprint and old bridge would even be allowed or physically possible during bridge construction, thus potentially limiting the use of the barge or changing where the barge would have to embark on the mainland side. The DEIS does not address how the two projects could occur concurrently nor how the proposed onshore transmission cable would stay in place should Sunrise Wind proposed work be completed first. Given that the bridge construction period appears to overlap with the landfall construction, the two construction timelines and footprints within the County Park must be evaluated and the impacts and challenges of this concurrent work disclosed in the EIS.</p>	<p>Sunrise Wind has been closely coordinating with Suffolk County authorities with design review meetings since 2019 to ensure the siting, workspace limits, design specifications, and installation timelines for the Project do not conflict with the Smith Point Bridge replacement project. Sunrise Wind continues to hold check-in meetings to share Project updates and discuss construction timelines to ensure conflicts are avoided or minimized to the extent practicable. Currently, Sunrise Wind anticipates completing construction activities that would overlap with the bridge replacement project areas (the ICW HDD and Onshore Transmission Cable installation) prior to the start of the County’s project and will continue to coordinate schedules as the start of construction nears. Waterborne passage along the ICW through the bridge areas will remain possible throughout the bridge construction. Information has been added to Section 2.1.2.1.1.9.</p>
<p>The DEIS shows the work areas within the landfall at the County Park (DEIS at 3-618). As noted above, “Access to the landfall area... would not traverse portions of the Otis Pike Wilderness area” (DEIS at 3-630). The map and key show the westernmost work area as likely tens of feet from the Wilderness boundary. Please provide the best estimate</p>	<p>The text was added in Section 2.1.2.1.1.9, and Section 3.18.5.1.1 has been revised to clarify the Limit of Disturbance from the Proposed Action in relation to the Otis Pike Wilderness Area. The closest Project disturbance to the Otis Pike Wilderness Area would occur approximately 65 ft (20 m) east of the wilderness boundary. All site</p>

NPS Comment	Response
<p>of the distance from the work area to the Wilderness boundary and the measures that would be proposed to ensure that construction work does not enter or directly impact the Wilderness Area.</p>	<p>disturbances would be confined to the Project's Limit of Disturbance per requirements from New York State, which will be delineated prior to construction. This line will be inspected and maintained until restoration activities are completed to ensure that construction activities do not occur in the Otis Pike Wilderness Area. An existing split rail and chain link fence contains areas west of the Limit of Disturbance, which is anticipated to provide additional protection during construction activities.</p>
<p>That same section of the DEIS also states, "The landfall site within Smith Point County Park is adjacent to the federally designated Otis Pike Wilderness Area. Land uses in the adjacent wilderness area would also be impacted due to land disturbance activities from construction activities. These impacts to adjacent land uses are anticipated to be moderate during the construction period. The Landfall Work Area would have a maximum disturbance of 6.5 acres (2.6 ha). To help minimize impacts, Sunrise Wind proposes an [applicant proposed measure (APM)] to complete construction activities to the extent possible in the off season of Smith Point County Park, which occurs from November 12 to March 31 annually; however, some construction activities may extend beyond that window (Suffolk County Parks 2018)" (DEIS at 3-628). The NPS does not agree that "impacts to adjacent land uses are anticipated to be moderate during the construction period" if the recreating public cannot reasonably access the area. We are also concerned with the statement that "some construction activities may extend beyond that window" both from an access to recreation standpoint and impacts to threatened and endangered wildlife as we address below.</p>	<p>Sunrise Wind has committed to maintaining public access to all facilities at Smith Point County Park during construction, which would allow for the recreating public to access the area. Sunrise Wind has also clarified the proposed APM, which has been revised in Section 3.22.5.1.1. The parking lot in Smith Point County Park will have reduced capacity during Landfall construction activities, but access to this and the surrounding areas will still be possible. Sunrise Wind has committed to maintaining access to all roads and the Smith Point County Parking lot during construction, with no road closures required. The only area that would be closed during construction activities is the Limit of Disturbance, which is located in the fenced area west of the Smith Point Bridge, where the new ICW HDD will exit. Closures to this area would be limited to the offseason and would overlap with locations that will be permanently impacted by the new Smith Point Bridge. During construction activities, public access to the Fire Island Wilderness Visitor Center and all other public trails and areas west of the bridge would be maintained.</p>
<p>The NPS urges that the EIS (1) provide greater detail and specificity regarding the schedule for construction within FIIS boundaries, (2) clarify what access, if any, the public will have to Smith Point County</p>	<p>(1) Table 2.1-4 of the EIS presents the onshore proposed construction schedule that Sunrise Wind has provided in the EM&amp;CP. However, it should be noted that this proposed schedule is</p>

NPS Comment	Response
<p>Park during the construction activities, (3) state all public access limitations to FIIS anticipated to be caused by the proposed construction activity, and (4) denote FIIS and Wilderness Area boundaries on relevant maps and in relevant descriptions. Further, if the public will have no reasonable access to the area during construction, that impact should be described as “major,” rather than moderate. In addition, the NPS does not agree with the conclusion that Alternative B’s impacts on recreation and tourism would be “negligible to moderate; minor beneficial” (DEIS ES-xiii) if recreational access is cut-off for a significant part of a year or several years. If BOEM requires additional information from the NPS, such as additional maps or information on recreational use patterns, please let us know.</p>	<p>dependent upon the receipt of permits.</p> <p>(2) Sunrise Wind is committed to maintaining access to Smith Point County Park during construction activities; however, access could be reduced during certain construction activities, such as reductions to parking spaces in the Smith Point County Park parking lot during landfall construction. No construction activities would occur in Suffolk County Parks between Memorial Day and Labor Day.</p> <p>(3) Public access limitations could include changes in traffic flow or reductions in parking spaces but continued access to recreation and tourism areas would be maintained throughout construction unless temporary restrictions are needed to maintain public safety. No public access limitations to FIIS are anticipated.</p> <p>(4) Relevant maps have been revised as needed.</p> <p>(5) Recreational access would not be cut off for a significant part of a year or several years. Major impacts to recreation and tourism are defined as "the affected activity or community would have to adjust to significant disruptions to large local or notable regional adverse impacts of the project." Construction activities would not prevent recreation and tourism activities from occurring in the area, and thus, BOEM feels that moderate impacts are a more appropriate description, which is defined as "the affected activity or community would have to adjust somewhat to account for disruptions due to the project." Recreationalists may have to adjust somewhat due to the Project, but it would not prevent users from being able to do the same activities that are currently available in the region and would not prevent access to any areas. At most, interruptions of a few minutes could be possible during certain points of construction for public safety purposes.</p>
<p>The DEIS does not sufficiently analyze the impacts of bringing the</p>	<p>All Project infrastructure within the FIIS boundary would occur</p>

NPS Comment	Response
<p>power cable ashore through NPS-administered waters from the wind farm. Nor have the actions within Smith Point County Park, and analysis of their impacts which could affect NPS resources, been well described. The most glaring omission is the lack of any description of the HDD operation and conduit placement to run the power cable through the conduit to shore through submerged lands over which the United States holds an easement for use and occupation for purposes of FIIS.</p>	<p>below the seabed, with the exception of a temporary landing structure. The temporary landing structure would include temporary disturbance of the seafloor of up to 150 ft<sup>2</sup> (46 m<sup>2</sup>) for the placement of steel piles that would support the structure. The Landfall HDD entry location would be located in the parking lot, and no trenching would occur on the beach. Text was added to Section 2.1.2.1.1.9 describing this.</p>
<p>More complete construction details for work in Smith Point County Park and in FIIS submerged lands, along with analysis of the impacts of that work, are needed to understand potential impacts to NPS resources. The EIS should expressly address the following issues:</p> <ul style="list-style-type: none"> <li>- Would the underwater HDD reach the parking lot or end short of the parking lot (on the beach) with open trench or some other method for the remaining distance?</li> <li>- What is the number and size of manholes or underground containment for the cable junctions? What is the weight? How will they be transported to the parking lot? Will the construction use prefab or poured concrete? These concerns speak to barge transport and impacts to Wilderness, etc. such as noise, lighting, and dust.</li> <li>- What construction method would be used to avoid existing infrastructure?</li> <li>- Conduit welding details need to be described: Where would it take place? How long would it take? What happens to the conduit if it has to remain in Smith Point County Park over time (over the summer or over a complete year(s))? What will be the impacts to the recreating public? Would areas be excluded from recreation use during the peak season and/or over the rest of the year?</li> <li>- Overall construction schedule with details as to what would happen, when, and where are not explained, including a definition of “off</li> </ul>	<p>Additional text and a table, including the construction schedule, have been added to Chapter 2, Section 2.1.2.1.</p>

NPS Comment	Response
<p>periods” with no construction. The only construction period timeline we’ve seen does not show any non-construction periods and seems to start this fall before the final EIS and ROD would be issued.</p> <ul style="list-style-type: none"> <li>- Description of the disturbance to the seafloor within FIIS boundaries and its impacts?</li> <li>- Please provide a description of the disturbance to the seafloor within FIIS boundaries and its impacts.</li> </ul>	
<p>The DEIS does not contain sufficient information on the barge landing locations, operations, and transit through the FIIS-administered water column and associated habitat. The NPS must have this information to understand the potential impacts we would be allowing by issuing a SUP for transit through waters over which the NPS has jurisdiction and in order to set adequate terms and conditions in such a permit.</p>	<p>The barge(s) would be operated between the Smith Point Marina and the Smith Point County Park parking lot. Loads in excess of 15 tons would be transported via barge. Trailers would be driven directly onto the barge, transported, and driven directly off the barge. The barges would be maneuvered using a 700-HP push boat. Currently, barge operation would occur continuously between the hours of 7 am and 7 pm, and approximately six to eight loads per day are anticipated. Assistance from the drawbridge operator would be required to allow the barge to pass under the Smith Point bridge. Text has been added to Chapter 2 that explains anticipated barge operations, and a map of locations has been included in Section 2.1.2.1.1.7.</p>
<p>The information that should be stated in the EIS includes the proposed actions addressed below, along with the impacts of those actions:</p> <ul style="list-style-type: none"> <li>- How would the barge be built? Is there a particular construction method or location where the barge would have to be built?</li> <li>- If commercial applications / barge models are being considered or have been secured, which company would supply these services, what model of barge would be used, and what has been the history of use of this barge for this proposed use? In these proposed conditions and at the proposed time of year (which is itself unclear)?</li> <li>- What construction methods would be used for the landing locations, including the onshore anchoring techniques, design and impacts?</li> </ul>	<p>The requested information was added to Section 2.1.2.1.1.9.</p>

NPS Comment	Response
<p>- How many trips does the developer anticipate making with the barge? How often? During which seasons of the year?</p> <p>- What equipment and materials would the barge carry? What would be the average weight carried per trip? The maximum weight to be carried? The DEIS described the need for “heavy equipment, such as excavators, cranes, dump trucks, and paving equipment” (DEIS at 3-630). The DEIS explanation did not describe how this equipment would arrive on site. Most readers would assume that these vehicles would drive across the bridge given the description. But we know this to be untrue as the bridge is no longer capable of carrying heavy vehicles, hence the need for the barge.</p> <p>- What methods would be used to secure the equipment and supplies to the barge?</p> <p>- What hazardous materials would be carried on the barge and contained in the equipment and machinery, such as oil, gas, antifreeze, etc.?</p> <p>- What habitats will be impacts (e.g. eelgrass beds, mudflats, wetlands) and what mitigation is proposed, if any, to address these impacts?</p> <p>- What method of propulsion and fuel would the barge use? Would the barge be pushed / pulled by a tugboat? If so, what size tug and would any tug mooring facilities be needed at the landfall?</p> <p>- What permits or authorizations from the US Coast Guard and / or the USACE would be needed to approve the barge use?</p> <p>- Have spill response, safety and emergency plans been prepared? The NPS will need to see such plans before issuing any permits.</p> <p>The answers to these questions will be critical in determining impacts of the barge on park resources, including the Wilderness area, and human health and safety, and terms and conditions we would need to include in the special use permit that would have to be issued.</p>	



NPS Comment	Response
<p>The DEIS lists a number of actions BOEM states would still occur should Alternative A, the no action alternative, be selected. In describing the DEIS’s methodology for assessing impacts, the DEIS states: “Ongoing and planned actions occurring within the geographic analysis area [GAA] include (1) other offshore wind energy development activities; (2) undersea transmission lines, gas pipelines, and other submarine cables (e.g., telecommunications); (3) tidal energy projects; (4) marine minerals use and ocean-dredged material disposal; (5) military use; (6) marine transportation (commercial, recreational, and research-related); (7) fisheries use, management, and monitoring surveys; (8) global climate change; (9) oil and gas activities; and (10) onshore development activities” (DEIS at 1-13 to 1-14). Similar statements are made regarding impacts on particular resources, e.g., DEIS at 3-691 (“Ongoing non-offshore wind activities within the GAA that contribute to impacts on recreation and tourism include undersea transmission lines, gas pipelines, other submarine cables, tidal energy projects, marine minerals use and ocean dredged material disposal, military uses, marine transportation, fisheries and management, global climate change, oil and gas activities, and onshore development activities. These activities are expected to continue at current trends and have the potential to affect recreation and tourism.”).</p> <p>However, this list is not accurate in determining reasonably foreseeable actions at the proposed landfall site. This description applies across the GAA and is not specific to the landfall area. Many of the above activities do not now and likely never would occur at the proposed landfall site. For examples, oil and gas activities will not be authorized at FIIS because the NPS does not have legal authority to do so. The NPS is also not likely to allow tidal energy projects, marine minerals use, ocean dredged material disposal, military uses, or</p>	<p>The discussion of impacts that could occur within the GAA for recreation and tourism activities is found in Section 3.21. The Recreation and Tourism GAA includes the following:</p> <ul style="list-style-type: none"> <li>• All Project components, plus a 40-mile radius from the WTG array;</li> <li>• Resources adjacent to the landfall construction area, including land within the Fire Island National Seashore boundary, Smith Point County Park boundary, and Otis Pike Wilderness boundary;</li> <li>• 1,000 feet into the Atlantic Ocean and 4,000 feet into Great South Bay, located within the boundary of the Fire Island National Seashore;</li> <li>• A three-mile radius around the proposed OnCS-DC site (Union Avenue site); and</li> <li>• Portions of the towns of Brookhaven and Islip, along with small portions of the villages of Lake Grove and Patchogue and the cable landfall and cable routes to the OnCS-DC site.</li> </ul> <p>The reasonably foreseeable actions considered in this EIS must consider the entire GAA and not just the reasonably foreseeable actions that would occur at the proposed landfall site.</p>

NPS Comment	Response
<p>marine transportation as these activities are not authorized by law within park boundaries and/or do not fit with the purposes of the Park. The EIS should contain a description of the impacts of the no action alternative to activities that are reasonably likely to occur at the proposed landfall location. The NPS would be happy to provide the exact language for BOEM use in the EIS regarding the impacts of the no action alternative at the landfall site.</p>	
<p>The Wilderness Area is directly adjacent to the Sunrise Wind landfall location and Smith Point County Park. Yet the DEIS doesn't adequately address possible impacts from the proposed project on the Wilderness Area. In particular, the DEIS sections on Wilderness impacts: Section 3.4.2.5.1.1 Water Quality, Onshore Activities and Facilities, Seafloor/Land disturbance (pg. 3-46); 3.6.5 Land Use and Coastal Infrastructure (pgs. 3-619, 3-628 to 3-629) downplay any potential impact. Please include in the EIS the bases for the statements that landfall at Smith Point County Park has "minimal conflicts with adjacent land uses," and will result in "minimal disruption to adjacent land uses" and various resources, particularly in light of the adjacent Wilderness Area, which is to be left "unimpaired for future use and enjoyment as wilderness," with its "wilderness character" preserved 16 U.S.C. § 1131 (purposes of National Wilderness Preservation System); see also 16 U.S.C. § 459e-6(a) ("The Secretary shall administer and protect the Fire Island National Seashore with the primary aim of conserving the natural resources located there."); 16 U.S.C. § 459e-6(b) ("every effort shall be exerted to maintain and preserve" the Otis Pike Fire Island High Dune Wilderness "in as nearly [its] present state and condition as possible").</p>	<p>Impacts to adjacent land uses, including the Otis Pike Fire Island Wilderness Area, would be temporary, localized, and indirect. BOEM anticipates that these impacts would be minimal because they should not permanently change the character of the adjacent areas and should not change the land uses that currently occur or would occur in the future. Additional discussion concerning the Otis Pike Fire Island Wilderness Area has been included in the Final EIS, including in Sections 2.1.2.1.1.7, 3.18.5.1.1, and 3.21.11.</p>
<p>The NPS is particularly concerned with the potential for an accidental release or discharge. The DEIS states, "Accidental releases and</p>	<p>As is stated in Section 3.18.5.1.1, the description of equipment mounted on concrete foundations with a secondary oil containment</p>

NPS Comment	Response
<p>discharges would potentially have negative impacts on land use to Fire Island National Seashore waters and onshore Otis Pike Wilderness Area. Releases and discharges could result in disruptions to land use in these areas by potentially causing for areas utilized by visitors to be temporarily closed due to the presence of fuel/fluids/hazardous materials and negatively influencing the wilderness area by polluting the area. ...Equipment would be mounted on concrete foundations with a concrete secondary oil containment designed in accordance with industry and local utility standards. In addition to this, Sunrise Wind would develop a Spill Prevention, Control, and Countermeasure Plan to help minimize any potential impacts during construction” (DEIS at 3-627).</p> <p>A more detailed description showing where and what equipment would be mounted on concrete foundations with concrete secondary oil containment should be provided. We do not recall seeing this information elsewhere in the DEIS. The NPS would want to review the Spill Prevention, Control, and Countermeasure Plan prior to issuing permits to ensure NPS resources are identified and would be adequately protected, and appropriate NPS contacts are listed. Terms and conditions specific to the Spill Plan may also be added to NPS permits.</p>	<p>structure describes the Onshore Converter Station (OnCS-DC) and is not relevant to any construction activity at the Landfall HDD site or ICW HDD. Sections 3.18.5.1.1 and 2.1.2.1.1.9 have been further revised to add more detail related to the Spill Prevention Control and Countermeasure Plan proposed by the Applicant.</p>
<p>Should unforeseen events such as a Wilderness area clean-up from a spill, the barge becoming unmoored and landing in the Wilderness, or equipment that fell off the barge land in the Wilderness, analysis in the form of a Minimum Requirement Analysis (MRA) and clean-up implementation that adhered to this analysis would be required. This further underscores the need to avoid such events and for the NPS to be involved in the Spill Prevention, Control, and Countermeasure Plan and any other emergency project planning.</p>	<p>Sunrise Wind has filed SPCC plans through the EM&amp;CP process, as well as COP Appendices E1 and E2. All site disturbance will be confined to the Project Limit of Disturbance, which does not include the Otis Pike Wilderness Area or the Fire Island Wilderness Center.</p> <p>NPS has indicated in a follow-up comment that they intend to require the Lessee to provide NPS an opportunity to review emergency plans (including the SPCC) for emergencies that may impact wilderness areas in connection with any NPS permits to be issued.</p>

NPS Comment	Response
<p><b>Water Quality Concerns</b> The potential water quality impacts to Great South Bay, Narrows Bay, and Moriches Bay from the floating barge have not been addressed. See our questions and comments about the barge and its landings above.</p> <p>The water quality impacts within FIIS boundaries from the Sunrise Wind Project as a whole have not been adequately addressed.</p> <p>DEIS at 3-31: The sentence describing water resources administered by the NPS appears incomplete. Revise it to say: “The NPS has administrative authority over all navigable waters within the legislative boundary of the Fire Island National Seashore, including the water column from the mean high-water line up to 4000 feet into Great South Bay, Narrows Bay, and Moriches Bay, and to 1000 feet into the Atlantic Ocean, from the eastern boundary of Robert Moses State Park to the western side of Moriches Inlet. New York State holds title to the Atlantic Ocean, including the seafloor, within the park boundary, but has granted full use and occupancy rights and ceded concurrent jurisdiction to NPS along the ocean for the entire length of the park boundary.”</p>	<p>Potential water quality impacts within FIIS boundaries, Great South Bay, Narrows Bay, and Moriches Bay will be minimized or avoided through BMPs and mitigation plans (i.e., SPCC, HDD Work Plan, Inadvertent Return Plan, OSRP). Hazardous materials will not be transported via the barge except for material in any vehicles or equipment. The Onshore and Offshore SPCC plans describe the measures that will be taken to avoid or minimize any accidental releases, the material storage and handling procedures, as well as the procedures for responding to and remediating any accidental releases.</p> <p>The text mentioned in the 3rd bullet has been revised.</p>
<p><b>Benthic Resources Concerns</b> DEIS at 3-82: Describe the cable corridor within the easement owned by the United States and administered by the NPS.</p> <p>DEIS at 3-84: Include a description of the characteristics of the benthic habitat within the United States easement area. If the description of the SRWEC-NYS area applies equally to the easement area, that should be expressly stated.</p> <p>DEIS at 3-99: This table should provide information on disturbance specifically within the easement owned by the United States and administered by the NPS.</p> <p>DEIS at 3-108: State expressly whether the increased DC EMF would</p>	<p>The cable corridor within the Fire Island National Seashore would be buried at a target depth of 5 to 75 ft (1.5 to 25 m) beneath the ground surface or channel bottom using an HDD and would be unlikely to affect the benthos. Text has been added to clarify the habitat characteristics within and outside of the Fire Island National Seashore boundary.</p> <p>In Section 3.7.5.1.1, the Final EIS describes where the seafloor disturbance would occur in relation to the Fire Island National Seashore boundary. The disturbance would be 2,225 ft offshore from MHWL, so it would be approximately 1,225 ft beyond the 1,000 ft easement. The COP (Sunrise Wind 2023b) states that an HDD exit</p>

NPS Comment	Response
<p>reach FIIS.</p>	<p>pit, which may be located offshore (approximately 2,225 ft [678 m] seaward from the MHWL) beyond the Fire Island National Seashore boundary, would disturb up to 61.8 ac (25 ha) of soft-bottom benthic habitat.</p> <p>The following was added to Section 3.7.5.1.1: "A small area of temporary disturbance (up to 4,800 sq ft (446 m<sup>2</sup>)) would occur within the 1,000 ft (304.8 m) easement owned by the United States and administered by the NPS for the temporary landing structure (discussed below under temporary structures).:</p> <p>The following note was added to Table 3.7-4: The temporary landing structure construction impact area would fall within the Fire Island National Seashore boundary.</p> <p>Appendix J2 of the COP, <i>Onshore EMF Assessment</i>, covers the landfall and buried sections of cable that would pass under the FINS sea bottom. The following sentence from Appendix J2 has been added to Section 3.7.5.2.1: "EMF: The Onshore Transmission Cable, SRWEC–Transition, SRWEC at the TJB, and the Onshore Interconnection Cable would not be a direct source of any electric field above ground due to the cable construction, duct bank, and burial underground (COP Appendix J2, Exponent Engineering 2022)."</p>
<p>Threatened and Endangered Species Concerns</p> <p>The DEIS states, "To help minimize impacts, Sunrise Wind proposes an APM to complete construction activities to the extent possible in the off season of Smith Point County Park, which occurs from November 12 to March 31 annually; however, some construction activities may extend beyond that window (Suffolk County Parks 2018)" (DEIS at 3-628).</p> <p>FIIS manages Park resources to, among other things, protect piping plover, which is listed as threatened under the Endangered Species Act. Beach closures occur annually from March 15 through the end of</p>	<p>The Article VII Certificate issued by NYSPSC includes the following conditions specific to potential presence of piping plover.</p> <ul style="list-style-type: none"> <li> <p><b>75.e.iii.</b> An area at least 1,000 meters in radius (from the ocean-side low water line or the farthest extent of dune habitat) around the active nest with unfledged piping plover chicks shall be identified and any on-beach areas as defined in Condition 75 (c) within that radius will be avoided until notice to continue construction, ground clearing, grading, maintenance, or restoration activities has been granted by DPS Staff and NYSDEC. Further, any on-beach areas, as defined in Condition 75 (c),</p> </li> </ul>

NPS Comment	Response
<p>August. The NPS requires more detailed information on construction activities to understand potential impacts to our ability to manage piping plovers on FISS lands, and the potential impacts to the species from potential spills and spill response, including accident access, to noise, and night / late afternoon lighting impacts. The possible extension of construction activities beyond the dates listed above would not be supported by the NPS if they were to result in adverse impacts to the piping plover.</p>	<p>within that radius that are also within the Project Corridor will be posted by the Certificate Holder;</p> <ul style="list-style-type: none"> <li>● <b>75.f. Record All Observations of NYS Threatened or Endangered Species.</b> During construction, restoration, operation and maintenance of the Facility and associated facilities, the Certificate Holder shall maintain a record of all observations of NYS threatened, or endangered species as follows:                     <ul style="list-style-type: none"> <li>○ <b>75.f.i Construction.</b> During construction, the on-site environmental monitor shall be responsible for recording all occurrences of NYS threatened or endangered species within the Project Corridor. All occurrences shall be reported in a biweekly monitoring report submitted to the DPS Staff and NYSDEC and such reports shall include the information described in subparagraph (iii) of this paragraph. If a NYS threatened or endangered bird species is demonstrating breeding or roosting behavior, it shall be reported to the DPS Staff and NYSDEC within twenty-four (24) hours (or as soon as possible, in the event that more than 24 hours are needed to compile the required details for such reports/notifications).</li> </ul> </li> </ul> <p>This topic is addressed in the EM&amp;CP, Section 4.7.1, submitted to the NYSPSC on 11/18/22: “The breeding habitats of red knot, roseate terns, piping plover and common terns do not occur in Project construction areas outside of Smith Point County Park. No on beach work (i.e., between the back dune and MLW) will occur between April 1 and August 31 to avoid impacts to RTE nesting shorebirds. From April 1 to August 31, while construction is occurring at the Landfall Laydown Area and ICW Laydown Areas, Sunrise Wind will immediately notify the NYSDEC if its</p>

NPS Comment	Response
	<p>Environmental Monitor observes nesting behaviors by any above-referenced nesting shorebirds within 500 ft (152.4 m) of the Landfall Laydown Area or ICW Laydown Areas. Due to the mobility and rarity of the listed bird species and construction timing and techniques, impacts to RTE bird species are expected to be minor to negligible.”</p> <p>Additionally, information has been added to Section 3.8.5.1.1.</p> <p>The only activity that could occur on the beach is conduit stringing. This is described in the COP, Section 3.3.3.3. HDD conduit stringing may occur on Burma Road within Smith Point County Park, in an area located onshore south of the Smith Point County Park camping area. In addition, this topic is also addressed in the EM&amp;CP, Appendix NN (HDD Work Plan), submitted to the NYSPSC on 3/27/23, and included as Attachment C of this submission: “The duct will be assembled on Burma Road within Smith Point County Park. Pipe rollers will be placed along Burma Road for support the conduit strings. The conduit will be maneuvered into the water using rollers and floated to the site by tugs for installation. When the duct sections are assembled, this action would require welding and short-term placement (i.e., 2–3 weeks per duct) of assembled HDD conduit sections. Approximately 3,500 ft (1,067 m) of duct sections will be laid out at the assembly site. Truck access will be restricted to the paved area and on Burma Road for delivery of the conduit. A fabrication area will be enclosed with temporary construction orange safety fencing and setup in a way to allow the conduit fusing equipment to be stationary during the fabrication process. As the fabrication process occurs tracked excavators will assist in pulling the conduit strings until each conduit string is fully fabricated. No improvements are planned for Burma Road as it meets the requirements for ingress and egress of the planned construction</p>

NPS Comment	Response
	<p>equipment and personnel. The duration of Burma Road activities is planned to take place for approximately 30 days from start of fabrication to removal, cleanup, and restoration of any impacted areas. HDD conduit stringing is anticipated to occur between February and March, in accordance with conditions of the [Article VII] Certificate.”</p> <p>This information has been added to Chapter 2, Section 2.1.2.1.1.9.</p>
<p>DEIS at 1-9: The description of the NPS’s involvement in the project at the top of page 1-9 of the DEIS is incomplete and missing analogous information included for the USACE and NOAA on page 1-8. Replace the paragraph regarding the NPS with the following: “The National Park Service (NPS) received an application from Sunrise Wind for Right-of-Way and Special Use permits at Fire Island National Seashore. This application was submitted for authorization to construct and install the transmission cable through lands within Fire Island National Seashore over which the United States holds an easement for the use and occupation for the purposes of Fire Island National Seashore, as well as conduct construction activity through NPS-administered waters. The NPS is evaluating Sunrise Wind’s application pursuant to 54 U.S.C. § 100902, 36 C.F.R. Part 14, and 36 C.F.R. § 5.7. The NPS intends to review BOEM’s Final EIS and, if the NPS determines that the Final EIS is sufficient to support the NPS’s decision-making, to rely on the Final EIS to achieve the NPS’s NEPA obligations.”</p>	<p>This text was added.</p>
<p>DEIS at 2-41: The DEIS describes Bellport Bay and Bluepoint Marina/Corey Beach as being “within federally designated wilderness area.” They are not. Revise that description to clarify that selection of either of those landfall sites would likely require that the transmission cable be placed through federally designated wilderness area, but that the alternative landfall sites themselves are not within the Wilderness Area.</p>	<p>This clarification was made.</p>



NPS Comment	Response
<p>DEIS at 3-619: The DEIS states that landfall at Bellport Bay or the Bluepoint Marina/Corey Beach “could have potential negative impacts to the federally designated Otis Pike Wilderness area.” This statement is incomplete and does not differentiate the Bellport Bay and Bluepoint Marina/Corey Beach landfall sites from the Smith Point County Park landfall site. This statement should be revised to clarify that landfall at Bellport Bay or the Bluepoint Marina/Corey Beach would likely require that the transmission cable be placed through federally designated wilderness area.</p>	<p>Section 3.18.1 has been revised to clarify this statement.</p>
<p>DEIS at 3-619: The DEIS reports that “[a]ccess to the Landfall Work Area would be through Smith County Park and would not traverse ... NPS managed portions of the Fire Island National Seashore.” To the contrary, the project proposal contemplates use of a barge traversing NPS-managed waters in order to reach the Landfall Work Area. The EIS should be revised for accuracy.</p>	<p>The text in Section 3.18.1 has been revised.</p>
<p>DEIS at 3-689: National Wildlife Refuges are not part of the National Park System. Change references to the “9 national parks” to “9 national parks and wildlife refuges.”</p>	<p>The text in Section 3.21.1 has been revised to state "nine national parks and wildlife refuges."</p>
<p>DEIS at 3-689 to 3-690: There is duplicative language regarding Suffolk County and FIIS that can be deleted.</p>	<p>The text in Section 3.21.1 has been revised to remove duplicative language.</p>

**O.4.1.5. Bureau of Safety and Environmental Enforcement**

No comments were provided on the Sunrise Wind Draft EIS.

**O.4.1.6. United State Fish and Wildlife Service**

No comments were provided on the Sunrise Wind Draft EIS.

**O.4.1.7. United State Army Corps of Engineers**

No comments were provided on the Sunrise Wind Draft EIS.

## O.4.2. Cooperating State Agencies

### O.4.2.1. Massachusetts Office of Coastal Zone Management

**Table O-6. Responses to Comments from Massachusetts Office of Coastal Zone Management [BOEM-2022-0071-0194]**

MACZM Comment	Response
<p>Of the project alternatives that BOEM has proposed, CZM recommends Alternative C2, which minimizes development impact on high-priority fisheries habitat. The WTG arrangement in Alternative C2 maximizes contiguous areas of complex bottom habitat that have been designated as high priority by the National Marine Fisheries Service. Avoiding development in areas of complex bottom and working to maximize the contiguous areas of complex bottom when such development is unavoidable, ensures intact habitat for commercially important species. Alternative C2 accomplishes this, without any reduction in the number of WTGs or eventual renewable power production.</p>	<p>Thank you for your comment, however based on new benthic data, Alternative C-2 is no longer feasible. Alternative C-3 has been proposed to minimize development in sensitive areas with the feasible WTG positions.</p>
<p>Appendix H outlines mitigation measures and monitoring protocols that Sunrise will employ to protect endangered species and other wildlife, maintain benthic resources including essential fish habitat, and ensure safe use of the wind lease area by vessels including commercial and recreational/for-hire fisheries. These measures should be codified as conditions in the final Record of Decision for the Sunrise project. Particularly important measures are highlighted below along with additional measures and clarifications requested by CZM.</p>	<p>Thank you for your comment, BOEM will take this into consideration.</p>
<p>The DEIS section 3.6.1 contains information on fisheries landings and revenue that will be exposed and includes breakdowns by species, gear, and port. This information is critical to avoid, mitigate, and minimize impacts on the commercial and for-hire fishing industry of Massachusetts and other states. The fisheries economic exposure</p>	<p>Thank you for your comment, please see Appendix H for mitigation measures.</p>

MACZM Comment	Response
<p>analysis in the FEIS should likewise include appropriate multipliers for the indirect and induced effects of lost fisheries revenue on the Massachusetts economy. These multipliers should be applied for both commercial and recreational/for-hire fisheries, and impacts should be broken down by port, gear, and species. Compensatory mitigation to offset potential economic losses should be codified in the ROD including timing, methodology, and oversight for the disbursement of funds.</p>	
<p>The FEIS should include a boulder relocation reporting plan to document and communicate the locations of moved or newly uncovered boulders to vessels that fish the area. Construction of monopile foundations and emplacement of the inter-array cables and the export cable will require extensive seafloor disturbance that will permanently alter the locations of boulder-related navigational hazards that are known to fishermen. Boulders pose a hazard for fishing vessels that may get hung up by their gear and relocating the boulders without effectively communicating their new locations compromises personal safety. This boulder reporting plan would complement the proposed Fisheries Communication plan.</p>	<p>Thank you for your comment, a Boulder Relocation Plan was developed which addresses your concerns. See Appendix H for more details.</p>
<p>CZM has reviewed the Sunrise Wind Fisheries and Benthic Research Monitoring Plan. The trawl surveys, acoustic telemetry studies of Atlantic cod and Highly Migratory Species, acoustic telemetry for evaluating electromagnetic frequency effects on elasmobranchs and horseshoe crabs, and soft and hard bottom benthic monitoring plans are rigorous and well-designed and should provide data to answer important questions about how the construction and operation of Sunrise might affect the distribution, abundance, and feeding of key species that currently exist within and adjacent to the project footprint. Sunrise should work with other research teams and with other developers to better understand and report on the anticipated</p>	<p>Thank you for your comment. The Monitoring Plan has been developed with input from federal and state agencies within the region. As described in the Fisheries and Benthic Research Monitoring Plan, annual reports and final reports at the end of each monitoring study will be provided to state and federal resource agencies. Final QA/QC'd data will be available upon request. Ørsted will continue to participate in the various regional working groups exploring standardized ways to store and provide access to benthic and fisheries monitoring data.</p>

MACZM Comment	Response
regional effects upon fisheries species.	
The commitment by Sunrise to use noise attenuation systems (NAS) for all pile-driving and unexploded ordnance detonation activities is an especially important mitigation measure that will protect marine mammals, sea turtles, as well as other species. As construction plans are finalized, Sunrise should pursue the best available NAS, including single or double bubble curtains or other technologies to minimize impacts on sensitive marine species.	There is currently no standard or method determining what constitutes a best available sound attenuation system. BOEM believes the requirement to use a noise attenuation system is adequate to minimize potential impacts of sound exposure.
CZM reviewed an earlier draft of the DEIS as a cooperating agency to the NEPA process. A mitigation measure listed in that draft, Appendix H Table H-1, stating "No pile installation will occur from 01 January to 30 April." has been removed from the current draft. This provision was specifically targeted at protecting endangered North Atlantic Right Whales. The FEIS should clarify whether this restriction is still in place, and if not, why it has been removed.	This measure was removed from Table H-1 because it was incorrectly identified as an APM. Time-of-year restrictions for marine mammals are defined in Table H-3, stating, 'No foundation impact pile-driving activities would occur January 1 through April 30.' In addition, NMFS recommends a conservation recommendation from the Biological Assessment (Table H-2) to "Work with the Lessee to develop a construction schedule that further reduces potential exposure of NARWs to noise from pile driving including avoiding impact pile driving in May and December."
The FEIS should detail how Sunrise intends to monitor to minimize impacts from the entrainment of ichthyoplankton (eggs and larval organisms) in the DC converter station cooling system	Mitigation measures to reduce impacts to finfish and EFH from the converter station were included in the design of the facility. The OCS-DC was designed to have a through-screen velocity of 0.43 ft/s (0.13 m/s), which is below the threshold required for new facilities defined at §125.84(c) and is therefore protective against the impingement of juvenile and adult life stages of finfish. Accordingly, only the species with egg or larval life stages present in the vicinity of the OCS-DC would be susceptible to entrainment. The water depth of the intake pipe openings ~ 30 ft (10 m) above the seafloor was selected to minimize entrainment of ichthyoplankton and to take advantage of the cooler water temperatures found at depth to minimize water withdrawal volumes. The intake pipe will be equipped with a variable frequency drive (VFD). The VFD technology

MACZM Comment	Response
	<p>allows the cooling water intake of the OCS-DC to be optimized as it relates to minimizing water withdrawals as power output and source water temperature varies temporally. Each intake pipe would have two coarse filters consisting of a Super-Duplex stainless steel vertical housing that encases a series of three banks of wedge wire filter tubes designed to filter suspended solids and organisms larger than 500 microns. The HZI is highly localized and does not extend within 15 ft (5 m) of the pre-installation seafloor grade or 98 ft (30 m) of the surface. Only eggs and larvae that enter the localized HZI would be susceptible to entrainment; species whose ichthyoplankton are buoyant or benthic would not be affected. "Based on recent conversations with the EPA, Sunrise Wind anticipates an NPDES Permit condition that will require monitoring of ichthyoplankton. Sunrise Wind will coordinate with the EPA to develop this Monitoring Plan. Monitoring would likely entail seasonal ichthyoplankton surveys, laboratory identification of eggs and larvae to lowest taxonomic level, and updated entrainment analysis."</p>
<p>The DEIS includes a calculation of equivalent adult losses expected from this unavoidable entrainment and characterizes the impact as minor. To ensure that losses are and remain minor through the operational lifetime of the project, a monitoring plan should be developed and described in the FEIS. This should include a description of regular operational procedures to inspect the cooling water intake system, its screens, and other entrainment prevention apparatus, and remediation measures that will be taken if intake velocity is found to be in excess of 0.5 fps or if impacts to target species are observed.</p>	<p>A Monitoring Plan is required for the NPDES Permit through the EPA. These details can be found in Table H-5 in Appendix H. At a minimum, biological monitoring must be conducted over a 48-hour period each quarter at two depth zones: within the estimated HZI of the cooling water intake system (CWIS) and the full water column. Sampling must begin the first year of full-scale operation to verify the performance of the technologies and operational measures to minimize adverse environmental impact. After 4 years of monitoring, the Permittee may request a reduction in monitoring frequency. Monitoring must continue as specified in the permit until written authorization by EPA is received. The Permittee must conduct an ambient thermal monitoring program in accordance with the study design specified in Attachment A to the NPDES Permit. Ambient</p>

MACZM Comment	Response
	<p>thermal monitoring must be conducted during the spring of the second year of full-scale operation to verify the assumptions of the thermal model and document the extent of the thermal plume.</p>
<p>The FEIS should include a detailed long-term monitoring and maintenance plan for inter- array and export cables to ensure all cables remain buried to the specified depth of 3-7 ft. Exposed and shallow cables are hazardous for all vessels that may drop anchor and are especially dangerous for fishing vessels that use gear that can become snagged on exposed cables. The monitoring plan should at a minimum detail the frequency and nature of cable inspections (e.g., annually plus after major storms) and the reporting requirements for these inspections. The maintenance plan should describe protocols for reburying the cable and preventing re-exposure, especially in areas of high seabed mobility such as sandy bottom. On-site inspections could be supplemented (but should not be replaced) with a distributed temperature sensing system, a cable alert system for vessels, and other measures to increase safety.</p>	<p>Thank you for the comment. All these concerns were considered and evaluated in the EIS, including alternatives that reduce the installation footprint in complex hard bottom habitats (see Alternative C). The feasibility of cable burial and secondary cable protection will be based on an assessment of seabed conditions, seabed mobility, the risk of interaction with external hazards such as fishing gear and vessel anchors, and a site-specific Cable Burial Risk Assessment. The burial depth requirement would be evaluated and applied to any action alternative, and as a result, BOEM can develop and apply the appropriate mitigation measures. If adequate avoidance could not be achieved through mitigation, then BOEM could require an update to the COP that could require additional National Environmental Policy Act (NEPA) review. In September 2023, Sunrise Wind submitted an updated COP that states the target burial depth would be 4 to 6 ft (1.2 to 1.8 m).</p>

**O.4.2.2. Rhode Island Department of Environmental Management**

**Table O-7. Responses to Comments from Rhode Island Department of Environmental Management [BOEM-2022-0071-0244]**

RIDEM Comment	Response
<p>The geographic area analysis for the analysis does not include adjacent leases. Therefore, prospective effects the area of interest has on adjacent areas and vice versa are not considered. This notion follows a similar concern of not evaluating the cumulative effects of development on these areas.</p>	<p>Adjacent lease areas are evaluated as part of the cumulative impacts section. Adjacent lease areas are also evaluated for some resources when the GAA overlaps with the surrounding lease areas. The Cumulative Historic Resources Visual Effects Analysis (CHRVEA) considers the cumulative visual effects of Sunrise Wind and eight adjacent lease areas that are considered reasonably foreseeable for ongoing or future development.</p>
<p>As presented, it seems the ‘No Action’ Alternative assumes a scenario where this project does not move forward, but that all others would. This scenario seems unrealistic, and can distort one’s interpretation of potential impacts from this project. As a result, such a scenario may imply that the impacts could be negligible, which would not be accurate.</p>	<p>The No Action Alternative uses existing offshore wind as the baseline and assumes this Project would not move forward. The cumulative action does, however, assume all projects would move forward to analyze the maximum impacts this area could experience.</p>
<p>Alternative C-2 will remove 8 WTG positions (identified in Alternative C-1), as well as a relocation of an additional 12 WTG positions from the Priority Areas of habitat identified by the National Marine Fisheries Service (NMFS). These WTGs will be relocated to the eastern side of the lease area, but ongoing geophysical and geotechnical surveys will help to determine whether the proposed WTG locations are feasible.</p>	<p>Thank you for your comment, these surveys have occurred and are discussed in the alternatives.</p>
<p>Of the alternatives presented, the RIDEM views Alternative C-2 as the most environmentally conservative alternative. The premise of Alternative C-2 is reasonable to minimize impacts to Atlantic cod (<i>Gadus morhua</i>) habitat. However, the Alternative as presented in Chapter 3 does not meet the premise as described in Chapter 2 (2.1.3.2). This is discussed further in comments specific to Chapter 3.</p>	<p>Thank you for your comment.</p>



RIDEM Comment	Response
<p>The determination that impacts of the proposed Alternatives C-1 and C-2, as currently presented, are negligible to minor may not be correct. If the Southern New England Atlantic cod biological stock's spawning is substantially impacted by the proposed action, this could result in stock-level population effects. The Atlantic Cod Stock Structure Working Group (ACSSWG) recently released their interdisciplinary review of Atlantic cod stock structure and determined that the Southern New England biological stock settlement has no plausible connectivity pathways originating from other stock areas. This suggests that Southern New England spawning results mainly in local settlement within the stock stratum and that impacts to local spawning activity could potentially have stock-level effects (McBride and Smedbol, 2022).</p>	<p>Due to glauconite sands, Alternative C-1 and C-2 are no longer feasible and will not be further evaluated. Alternative C-3 has been developed to address these feasibility issues with habitat minimization of Atlantic cod habitat in mind. Your comment was considered when analyzing impacts.</p>
<p>None of the alternatives present utilizing a smaller number of turbines to only meet the requirements of the 924 MW NYSERDA power purchase agreement and instead all focus on meeting the goal of 1,034 MW. While the "Purpose and Need" of the project is defined as what is requested in the Construction and Operations Plan, it remains unclear why this is the case, as there are no obligations for the developer to provide the additional MWs. If these additional MWs are required to make the Sunrise Wind project commercially viable, this should be stated explicitly and described as an alternative considered but not analyzed. Alternatively, if this is not the case, an alternative that avoids additional sensitive habitats by further reducing the number of WTGs should be analyzed in detail.</p>	<p>Alternative C3 has been developed and addresses this issue.</p>
<p>RIDEM suggestions for BOEM on requirements for the developer:</p> <ul style="list-style-type: none"> <li>• Work with the Rhode Island commercial and recreational fishing industries to minimize impacts to fishing activities and the biological resources on which they rely to the</li> </ul>	<p>Sunrise Wind is committed to collaborative science with the commercial and recreational fishing industries prior to and following construction. Please see Appendix H for additional mitigation measures and plans.</p>

RIDEM Comment	Response
<p>greatest extent possible and offer appropriate mitigation plans if adverse impacts cannot be avoided.</p> <ul style="list-style-type: none"> <li>Mitigation plans should be developed with substantial input from the Rhode Island Fishermen’s Advisory Board (FAB) and the CRMC.</li> </ul>	
<p>Conduct comprehensive fisheries resource monitoring surveys consistent with the recommendations outlined by the Responsible Offshore Science Alliance (ROSA): <a href="https://4d715fff-7bce-4957-b10baead478f74f6.filesusr.com/ugd/99421e_b8932042e6e140ee84c5f8531c2530ab.pdf">https://4d715fff-7bce-4957-b10baead478f74f6.filesusr.com/ugd/99421e_b8932042e6e140ee84c5f8531c2530ab.pdf</a>.</p> <ul style="list-style-type: none"> <li>These surveys should address concerns related to biological impacts associated with pile driving and operational noise, habitat loss and creation, sedimentation, electromagnetic fields, and cumulative impacts.</li> <li>Surveys should include as many years as possible for data collection during pre, during, and post construction phases of the project to best characterize the environmental impacts.</li> </ul>	<p>Thank you for your comment. Sunrise Wind developed a Fisheries and Benthic Habitat Monitoring Plan (dated April 8, 2022) that has been prepared in accordance with recommendations set forth in BOEM's <i>Guidelines for Providing Benthic Habitat Survey Information for Renewable Energy Development on the Atlantic Outer Continental Shelf Pursuant to 30 CFR Part 585</i> (BOEM 2019) and has committed to conducting preconstruction, during construction, and post-construction surveys and monitoring as part of the Proposed Action. The Monitoring Plan can be found at the following link: Proposed Action. The Monitoring Plan can be found at the following link: <a href="https://www.boem.gov/sites/default/files/documents/renewable-energy/state-activities/SRW01_COP_AppAA1_Fisheries%20and%20Benthic%20Monitoring%20Plan_2022-04-08_508.pdf">https://www.boem.gov/sites/default/files/documents/renewable-energy/state-activities/SRW01_COP_AppAA1_Fisheries%20and%20Benthic%20Monitoring%20Plan_2022-04-08_508.pdf</a>.</p> <p>In addition to BOEM's guidance, the Fisheries and Benthic Monitoring Plan was developed using monitoring guidelines as part of the Rhode Island Coastal Resources Management Council's <i>Rhode Island Ocean Special Area Management Plan</i> (Ocean SAMP; RICRMC 2010). The Fishery Management Plan (FMP) was also developed through an iterative process, whereby survey protocols and methodologies were refined and updated based on feedback received from stakeholder groups. Stakeholder groups involved in this process included NOAA, NMFS, BOEM, Rhode Island Coastal Resources Management Council, Rhode Island Department of Environmental Management (Division of Marine Fisheries), Massachusetts Division of Marine Fisheries, Massachusetts Office of Coastal Zone Management, and</p>

RIDEM Comment	Response
	representatives from the Responsible Offshore Science Alliance and the Responsible Offshore Development Alliance.
<p>Conduct high resolution benthic habitat characterization and avoid areas of sensitive benthic habitats. These habitats provide refuge and structure for juvenile fish and invertebrates, as well as spawning areas for adult life history stages.</p> <ul style="list-style-type: none"> <li>The NOAA Greater Atlantic Regional Fisheries Office has developed benthic habitat mapping recommendations to better inform Essential Fish Habitat consultations: <a href="https://media.fisheries.noaa.gov/2021-03/March292021_NMFS_Habitat_Mapping_Recommendations.pdf?null">https://media.fisheries.noaa.gov/2021-03/March292021_NMFS_Habitat_Mapping_Recommendations.pdf?null</a>. These recommendations should be followed to ensure avoidance of sensitive habitats.</li> </ul>	<p>Sunrise Wind has conducted the recommended benthic habitat mapping and characterization survey to support COP development. This analysis was conducted consistent with NOAA 2021 guidance and was used to support the impact analysis presented in the Draft EIS and the Final EIS.</p>
<p>Minimize impacts to birds, sea turtles, and marine mammals, especially the critically endangered North Atlantic right whale (<i>Eubalaena glacialis</i>).</p> <ul style="list-style-type: none"> <li>Southern New England has been identified as a significant foraging ground for right whales during their migrations. Significant measures have been taken to improve their population status via commercial lobster fishing restrictions. Additional commercial fishing measures are being evaluated by the Atlantic Large Whale Take Reduction Team, in addition to vessel speed requirement, to meet additional risk reduction targets. As such, the project should take the necessary actions to ensure it does not counteract these efforts.</li> <li>Impact minimization could occur through, but is not limited to, construction time of year restrictions and exclusion zones, vessel speed restrictions (applied to all vessels</li> </ul>	<p>Sunrise Wind has committed to mitigation measures as proposed in the MMPA Letter of Authorization (LOA) Application and Protected Species Mitigation and Monitoring Plan (PSMMP) and included in Table H-1 of Appendix H of the Final EIS. Mitigation measures include, but are not limited to, vessel speed restrictions and noise mitigation measures. Please see Appendix H to review these measures.</p>

RIDEM Comment	Response
<p>associated with the wind farm), and noise mitigation measures. Sound scientific data collection and monitoring of the wind energy area is also essential to evaluating potential effects in real-time to enable implementation of adaptive management measures.</p>	
<p>The DEM is supportive of a 1 x 1 NM turbine grid layout to improve safety and fishing ability of the windfarm as best as possible.</p>	<p>Thank you for your comment.</p>
<p>The project includes one direct current (DC) export cable, at 3-7 ft. burial depth. Efforts should be made to avoid not achieving target burial depth to minimize impacts to fishing activities within the cable route. If a cable cannot be buried to 3 ft., or is located at a crossing with existing cables, and matting is installed, all cable matting locations should be made available to the public and matting should be designed to limit the creation of new fishing 'hangs'.</p>	<p>Thank you for the comment. Alternatives that reduce the installation footprint in complex hard bottom habitats were considered (see Alternative C). The feasibility of cable burial and secondary cable protection will be based on an assessment of seabed conditions, seabed mobility, the risk of interaction with external hazards such as fishing gear and vessel anchors, and a site-specific Cable Burial Risk Assessment. The burial depth requirement will be evaluated and applied to any action alternative, and BOEM will develop and apply any appropriate mitigation measures as a result. If adequate avoidance cannot not be achieved through mitigation, then BOEM can require an update to the COP that could require additional NEPA review. Additionally, please note Sunrise Wind submitted an updated COP in September 2023 that states the target burial depth would be 4 to 6 ft (1.2 to 1.8 m).</p>
<p>The cooling water intake system should be sited away from known areas of species spawning activity (e.g., Atlantic cod).</p>	<p>Moving the OCS-DC to another location is not technically or economically feasible, as it would necessitate a full redesign of the OCS-DC topside and jacket foundation and result in significant delays to the Project that are not compatible with meeting Sunrise Wind's purpose and need. The location of the OCS-DC was specifically selected as it is centrally located to balance the length of the export and collection infrastructure and account for the electrical constraints on the number of WTGs that can be connected to a single inter-array cable (IAC). Geotechnical surveys, including at each of the four legs of</p>

RIDEM Comment	Response
	<p>the OCS-DC piled jacket foundation and its center point, were completed in September/October 2020 in order to provide the required data for the detailed design of the OCS-DC foundation. Extensive G&amp;G surveys have also been completed at WTG positions, IAC corridors, and the Sunrise Wind Export Cable (SRWEC). Relocation of the OCS-DC would require additional G&amp;G surveys, and potentially benthic surveys, at a new OCS-DC location, as well as along the new IAC and SRWEC corridors. In summary, the time to plan, source, and complete surveys, ground modeling, Qualified Marine Archaeologist (QMA) analysis, potential unexploded ordinance/munition concern (pUXO/MEC) assessments, potential pUXO/MEC inspections, and updates to Project 2 reports, would have significant cost and schedule implications. There would also be a substantial knock-on effect in the design, engineering, fabrication, and installation of the OCS-DC, IAC, and SRWEC.</p>
<p>Construction and decommissioning of offshore wind farms may lead to loss of sediment and thus certain habitats. During any construction, local water turbidity may increase, as suspended solids and contaminants within the sediments may be mobilized and transported by prevailing water movements.</p> <ul style="list-style-type: none"> <li>• These mobilized sediments may also smother neighboring habitats of sessile species, as well as the living organisms themselves (Gill 2005).</li> </ul>	<p>Thank you for your comment, this information was incorporated into the Final EIS. A sediment transport modeling report completed for the SRWF is presented in Section 3.5.5.1.2 of <i>Water Quality</i>. Additionally, turbidity and suspended sediments are discussed in Section 3.7.5.1.2 of <i>Benthic Resources</i></p>
<p>Suspended sediment poses a threat to fish within the construction area, as it may physically clog their gills and limit oxygen intake (Lake and Hinch 1999). Larval states are more vulnerable than adult life history stages due to more limited mobility, as well as larger gills and higher oxygen consumption in proportion to body size (Auld and Schubel 1978; Partridge and Michael 2010).</p>	<p>Agreed; this text has been included in the EIS.</p>

RIDEM Comment	Response
<p>Sediment dispersal may also smother eggs and benthic suspension feeders by clogging the feeding or respiratory apparatus. Some benthic epifauna and deep burrowing infauna may also be unable to escape burial by displaced sediment. While sedimentation events are generally brief, seabed communities may be greatly altered and take years to recover (Maurer et al. 1986).</p>	<p>Thank you for your comment, this information is included in Sections 3.7.5 and 3.10.5. The <i>Benthic Impacts</i> section acknowledges that impacts would be moderate, and the description cites several studies that found soft bottom benthic communities recovered as quickly as 3 months, but noted that some studies found that recovery took 2 to 3 years (Kraus and Carter 2018; Brooks et al. 2006; BOEM 2015; Normandeau Associates 2014).</p>
<p>The RODEO study of the benthic habitat changes at the BIWF documented heavy colonization of the turbine structures by blue mussels three years post-construction, demonstrating changes in the dominant biota. Black sea bass were found in large numbers and appeared to benefit from added structure (Hutchison et al. 2020).</p> <ul style="list-style-type: none"> <li>The study also found that the BIWF did not demonstrate the same strong vertical epifaunal zonation as observed on European farms. This may suggest that after three years, the habitat is still in a successional state and additional monitoring is needed to document the final successional stage (Hutchison et al. 2020). As such, longer benthic assessments should be conducted on projects moving forward.</li> </ul>	<p>Thank you for your comment. We reviewed the references and added information on blue mussels to the Final EIS. In Appendix AA1 of the COP, Fisheries and Benthic Monitoring Plan, Table 11 lists 5 years of monitoring for the novel hard bottom monitoring to include remotely operated vehicle (ROV)/ video data collection. This is longer than the 3 years noted by the comment. The Monitoring Plan describes the monitoring: the hard bottom monitoring will include an examination of three types of offshore wind (OSW) novel surfaces: WTG foundations (including scour protection layers), cable protection layers (SRWEC-OCS), and the converter station foundation (OCS-DC jacket). The primary objective of the novel hard bottom survey is to measure changes over time of the nature and extent of macrobiotic cover of hard bottom associated with OSW development. Macrofaunal percent cover, identification of key and dominant species, and the relative abundance of native and non-native organisms will be documented using a ROV and video surveying approach. Distinguishing non-native organisms will likely require physical sampling for accurate identification, which will be facilitated by a sampling arm attached to the ROV.</p>
<p>Soft sediments are generally preferred for wind farm development, as hard substrates may create challenges in turbine foundation and transmission cable installation.</p> <ul style="list-style-type: none"> <li>Grabowski et al. (2014) suggest that soft sediment</li> </ul>	<p>The WTG sites were not chosen solely on the sediment size as noted by NMFS in the prioritization. Alternative C-3 avoids impacts to a substantial part of the Lease Area that contains contiguous soft bottom habitat.</p>

RIDEM Comment	Response
<p>habitats have an inherent ability to recover more rapidly from anthropogenic impacts than other substrates. However, Henriques et al. (2014) contend that this is not appropriate logic to develop such areas due to the high number of affected species and possible consequences of impacts on those species for ecosystem structure and function (Grabowski et al. 2014; Henriques et al. 2014).</p>	
<p>Section 3.5.2.7 – Alternative C-2 - Reduced Layout from Priority Areas via Exclusion of up to 8 WTG Positions and Relocation of 12 WTG Positions to the Eastern Side of the Lease Area:</p> <ul style="list-style-type: none"> <li>• As noted above, the intent of Alternative C-2 is sound. However, there appear to be inconsistencies between the alternative’s goal and the method by which WTGs were relocated. The only metric that appears to have been used to identify the 20 WTGs to be moved is boulder density. While boulder density is indicative of complex benthic habitat, other metrics should be considered. For example, water depth plays a role and data on cod spawning activity in the area are available (refer to the Essential Fish Habitat Assessment for Sunrise Wind Offshore Wind Project, Figure 4-1).</li> <li>• Not including other metrics in this decision-making results in the alternatives not fully analyzing the potential impacts on cod larvae.</li> </ul>	<p>Alternative C-3 uses habitat, boulders, and Atlantic cod spawning data to determine WTG placement to reduce impacts on sensitive habitat for Atlantic cod. Due to the discovery of glauconite sands, Alternative C-1 and C-2 are no longer technically feasible. Recent Atlantic cod detection data was added to help develop Alternative C-3 which is discussed in Section 3.7.8.</p>
<p>Of species that are likely to be impacted from development in the Sunrise Wind lease area is Atlantic cod, which spawns in this area. Efforts should be made to avoid turbine placement, and construction in close proximity to any areas of complex benthic</p>	<p>Thank you for your comment. To address these issues, Atlantic cod is considered in Alternative C-3. Additionally, pile driving would not be permitted during a portion of the Atlantic cod spawning time frame, which will hopefully reduce impacts. BOEM is in consultation with</p>

RIDEM Comment	Response
<p>habitat in general in an effort to best maintain current complex habitat structures that species such as Atlantic cod rely on. Atlantic cod have supported significant recreational and commercial fisheries that are important to coastal communities, especially in Rhode Island (Serchuk and Wigley 1992; Oviatt et al., 2003). Climate change is anticipated to hinder Atlantic cod stock rebuilding, but recreational angler accounts suggest that abundance of cod south of Rhode Island has increased significantly over the past 15 years (Sheriff 2018). Cox Ledge may be very important for effective stock rebuilding given the unique habitat of the area and potential significance in spawning. Early life history stages of Atlantic cod need complex benthic habitats, specifically boulder, cobble, and pebble substrates (NOAA 1999). Moreover, cod exhibit site fidelity (Zemeckis et al. 2017) and spawning aggregations are sensitive to disturbance (Dean et al. 2012). Langan et al. (2019) suggest that eggs and larvae spawned near Cox Ledge may settle in Narragansett Bay based on larval cod observations in the Bay and their estimated hatching dates.</p>	<p>NMFS to best reduce impacts to Atlantic cod with these concerns in mind.</p>
<p>The full spatial and temporal extent of Southern New England Atlantic cod spawning is poorly understood, as many long-term scientific surveys do not provide the spatial and temporal resolution needed to properly characterize the distribution of cod spawning activity (DeCelles et al. 2017). However, recently it has been suggested that the Southern New England cod stock has major self-connectivity, meaning that spawning activity in the stratum is the primary source of settlement within that stratum. As such, all available data to date should be used to best understand the spawning dynamics of the species and inform impact risks.</p>	<p>Thank you for your comment. We are using the most up-to-date data available, including data from the recent BOEM-funded studies on Atlantic cod in this area, to help inform the decision-making process.</p>



RIDEM Comment	Response
<p>Despite long-term spatially resolved information, the presence of spawning aggregations of cod in southern New England waters has been documented through various sources (Zemeckis et al. 2014). Cod have historically been managed as two units: the Gulf of Maine and the Georges Bank management units (McBride and Smedbol 2020), both of which are currently in depleted states (NEFSC 2017a, NEFSC 2017b). Although managed as two broad stocks, the management units are believed to have finer scale structure within that support metapopulations. This metapopulation structure is likely critical in supporting the overall stock. Such metapopulation and heterogeneity characteristics are important to identify, as mismatches between management units and stock structure can reduce the effectiveness of management measures. Further, the connectivity between stocks and metapopulations is important to account for to better understand a stock’s resiliency to various natural and fishing mortality pressures. For example, it has been suggested that cod spawning components in the Great South Cannel, Nantucket Shoals, southern New England and the MidAtlantic are more connected (genetically and in terms of larval dispersal) with spawning components in the Gulf of Maine than those on eastern Georges Bank, the unit with which they are currently managed with (Zemeckis et al. 2014).</p>	<p>Thank you for your comment. This information has influenced the development of Alternatives C-1, C-2, and C-3 to reduce impacts to the Atlantic cod population.</p>
<p>The ACSSWG supports the finer scale biological stock structure scenarios, and identified a series of mismatches: 1) phenotypic and genetic heterogeneity suggesting that cod are not mixed within management units, 2) extensive movements between management units, and 3) dispersal of larvae around Cape Cod from the Gulf of Maine unit to the Georges Bank unit (McBride and Smedbol 2020). The ACSSWG concluded that there are likely more than two stocks of Atlantic cod, highlighting the need for improved science on a fine</p>	<p>Thank you for your comment. This information has influenced the development of Alternatives C-1, C-2, and C-3 to reduce impacts to the Atlantic cod population.</p>

RIDEM Comment	Response
<p>scale spatial structure for this species, particularly in areas that seem to sustain cod</p>	
<p>Of these newly proposed management units, a separate southern New England (SNE) stock (represented as NOAA Statistical Areas 537, 538 and 539) is included. Spawning is known to occur within the area between late fall/early winter (Nov-Jan) and late winter/early spring (Feb-Apr), which some suggest represents a single metapopulation unique to this area.</p> <ul style="list-style-type: none"> <li>The DEIS does not discuss potential time of year restrictions for construction or potential seasonal mitigation measures for the cooling water intake system (discussed more below) for Atlantic cod spawning. The time of year that certain construction (e.g., pile driving) and operation activities (e.g., cooling water intake) occur may substantially impact spawning activities for this species. The Southern New England strata have ample habitat available (meaning depth and temperature preference) at the time of year when winter-spawned larvae become capable of settlement (McBride and Smedbol, 2022), indicating that disruptions to spawning during the Nov-Jan or Feb-Apr periods could limit the amount of habitat available at the time of larval sediment.</li> </ul>	<p>Thank you for your comment. The EIS has been revised to be consistent with revisions to the EFH Assessment document, including environmental protection measures (EPMs)/mitigation measures.</p>
<p>Currently, the Atlantic Cod Research Track Stock Assessment Working Group is looking to implement the recommendations from the ACSSWG by constructing empirical or analytical stock assessment models for cod. This could result in a separate biologically managed stock for SNE. If Cox Ledge and wind energy areas are significant in supporting a SNE cod stock, development could then have dire impacts on the stock itself and have substantive impacts for fisheries management at this finer scale.</p>	<p>Thank you for your comment. This information has influenced the development of Alternatives C-1, C-2, and C-3 to reduce impacts to the Atlantic cod population.</p>

RIDEM Comment	Response
<p>The construction phase is the most likely to have negative effects on fish and habitat. Of primary concern is construction noise generated by pile driving operations. High sound levels can cause hearing loss (threshold shifts), elicit stress, and alter behavior of fish. Impacts will vary by species, as well as sound exposure (Popper et al. 2003).</p> <ul style="list-style-type: none"> <li>• For Atlantic cod, noise of frequencies from 100-1000 hertz has been found to reduce reproductive output (Sierra-Flores et al. 2015).</li> <li>• Operational phase noise is not likely to cause permanent damage, but it may mask communication in some fish species (Wahlberg and Westerberg 2005). This remains one of the least studied areas of wind farm noise impacts (Mooney et al. 2020).</li> <li>• In the context of anthropogenic noise, it is important to consider invertebrates separately from vertebrates; invertebrates (e.g., mollusks) hear in a different manner than vertebrates due to their nervous system structure and hearing organs. Their hearing organs, statocysts, work by detecting particle motion instead of sound pressure (Stocker 2002).                         <ul style="list-style-type: none"> <li>○ There may be negative impacts near the project, as de Soto et al. (2013) suggest that even routine anthropogenic noise can decrease recruitment of scallop larvae in wild stocks (Madsen et al. 2006).</li> <li>○ Jones et al. (2020) determined that longfin squid exhibited a startle response to pile driving noise in a lab setting but they habituated quickly in the short term. 24 hours later, the squid were re-sensitized to the noise.</li> </ul> </li> </ul>	<p>Thank you for your comment, more information about noise effects on aquatic organisms is included in the Final EIS, please see Sections 3.10.3 and 3.10.5.</p>

RIDEM Comment	Response
<p>The operational phase of the project will present additional challenges in the form of the cooling water intake system and electromagnetic fields from the submerged cables. Most previous studies on electromagnetic fields have focused on direct current (DC) cables. DC and AC cables should not be considered comparable when determining impacts, as fish may perceive static and alternating magnetic fields differently (Rommel and McCleave 1973a). This project has both a DC transmission cable and AC interarray cables, which should be analyzed independently.</p> <ul style="list-style-type: none"> <li>• Various elasmobranchs (e.g. smooth dogfish and blue sharks) and teleost fish (sea lamprey, American eels, and Atlantic salmon) are all thought to be able to sense electric fields at low levels (Heyer et al. 1981; Kalmijn 1982; Rommel and McCleave 1973b). However, it is presently unknown whether behavioral changes will result from detected AC electromagnetic fields. Behavioral responses of American lobster and little skates have been documented in response to DC electromagnetic fields emitted by two high-voltage DC cables: increased foraging/exploratory behavior in skates, and a subtler exploratory response in lobsters (Hutchison et al. 2018; Hutchison et al. 2020).</li> </ul>	<p>Both alternating current (AC) and direct current (DC) cable impacts are analyzed within the Final EIS. Additional analysis of the potential effects of the cooling water system was added to the Final EIS in Section 3.11, <i>Marine Mammals</i>. For potential EMF impacts, the primary justification for negligible impacts is that the area where magnetic fields is potentially detectable is very small, and unlikely to be detectable at the surface of the substrate in areas where cable is buried. EMF will only extend a couple of feet above the substrate in areas where the cable is at the surface of the substrate or under rock armoring.</p>
<p>The impacts of induced electromagnetic fields are expected to be greater for cartilaginous fish because they use electromagnetic signals to detect their prey (Bailey et al. 2014; Gill 2005; Gill and Kimber 2005; Bergstrom et al. 2014).</p>	<p>This text was included in the Final EIS in Section 3.10.5.2.2.</p>
<p>Other fish may also be affected by interference with their capacity to orient in relation to the geomagnetic field, potentially disturbing fish migration patterns (Metcalf et al. 2015) and ultimately</p>	<p>This text was included in the Final EIS in Section 3.10.5.2.2.</p>

RIDEM Comment	Response
<p>disturbing their habitat.</p>	
<p>The developer has considered a variety of offshore fishing data sources: vessel trip reports (VTRs), vessel monitoring systems, and Marine Recreational Information Program data. Each data source has merits and limitations, as none of these data reporting systems were designed to assess the spatial distribution and value of offshore catch. A variety of studies are currently underway to generate additional data sharing systems and assessment tools.</p> <ul style="list-style-type: none"> <li>• Other sources of data and improved methods should be incorporated into impact assessment as they become available. For example, vessel monitoring system (VMS), automatic identification system (AIS), and electronic monitoring data are becoming more prevalent and may present opportunities to improve upon existing methods. These data may offer higher spatial and temporal resolutions, and address challenges associated with self-reporting, when compared to VTRs.</li> <li>• Additional methods are particularly needed to understand potential changes to recreational fishing activities.</li> </ul>	<p>Both vessel monitoring system (VMS) and automatic identification system (AIS) data were used within various components of the development of the Sunrise Wind COP and have been presented within the EIS. Sunrise Wind included a Navigation Risk and Safety Assessment (NRSA) as part of their COP that utilized AIS and VMS, as well as other data, to evaluate the impact of the proposed SRWF on navigation. VMS data and figures are presented within Section 3.6.1 to provide context for the different vessels transiting the Lease Area or actively fishing the Lease Area. Although the VMS data is more related to commercial fishing, the EIS utilized the Marine Recreational Information Program (MRIP) data that is discussed within the Sunrise Wind COP to understand for-hire recreational fishing.</p>
<p>The development may offer benefits to certain fish and invertebrate species through structure creation (i.e., artificial reefs). The turbine foundations may thus increase hard substrate for recruitment following any disturbance during the construction phase (Petersen and Malm 2006). The reef effect can increase food availability (Degraer et al. 2020) and biodiversity and biomass (Inger et al. 2009; Gill 2005; Linley et al. 2007). However, new habitat created by the turbine foundations may not benefit all species that utilized the local habitat prior to construction, and may serve to attract biomass as</p>	<p>Text regarding the artificial reef can be found in Section 3.10.5.2.2. Text was also added to this section to discuss how this change in habitat may not serve all species that utilized the habitat prior to construction. A Fisheries and Benthic Monitoring Plan (Appendix AA1 in the COP) will be implemented following approval of the Project.</p>

RIDEM Comment	Response
opposed to result in increased ecosystem productivity. As such, it is important that these elements be evaluated as possible throughout the project to best understand the long-term effects of the region.	

### O.4.2.3. New York State Agencies

The following comments are from the New York State Department of State (NYSDOS), Department of Environmental Conservation (NYSDEC), and the New York State Office of Parks, Recreation, and Historic Preservation (OPRHP), in coordination with the Department of Public Service (NYSDPS), (collectively, the NYS Agencies).

**Table O-8. Responses to Comments from New York State Agencies [BOEM-2022-0071-0245]**

New York State Agency Comment	Response
<p>There are multiple sub-alternatives that identify a range of turbine position removal and relocation scenarios within three (3) priority areas. The Agencies urge BOEM to analyze physical and ecological data, including recently conducted telemetry and geotechnical studies within the lease area, the potential for unintended consequences as a result of shifting turbine positions, and appropriate minimization and mitigation measures for each of the sub-alternatives before selecting the Preferred Alternative.</p>	<p>Thank you for your comment. We have received the recent Atlantic cod data and used it in the analysis for Alternative C-3, along with benthic data. Due to the discovery of glauconite sands, Alternative C-1 and C-2 are no longer technically feasible.</p>
<p>Level of Impacts: The Agencies urge that BOEM refine its impact level definitions system to afford greater weight for impact avoidance within the “Beneficial Impact Levels” category. The benefits of avoidance should be identified as either Moderate or Major so that these attributes can be appropriately considered when analyzing the Proposed Action and Alternatives. For example, alternatives that preserve spawning habitats and reduce in-water disturbance would also have less of an effect on commercial fishing.</p>	<p>The Final EIS uses a four-level classification scheme to characterize the potential impacts of the alternatives, discussed in Section 3.1. Resource-specific impact level definitions are presented in each resource section, and the impacts of each alternative align with the appropriate impact level, as supported by the analysis. EIS alternatives reduced impacts to some resources; however, did not always result in a change to the resource’s impact level conclusion. The minimization of impacts is identified and quantified where possible in the Final EIS.</p>
<p>The Agencies continue to recommend a minimum target cable burial depth of 6ft for all projects, where technically feasible. This burial depth is consistent with BOEM’s Draft Fisheries Mitigation Guidance and typically provides sufficient protection to both the cable and</p>	<p>EIS Section 3.3 defines the terminology used throughout the EIS to characterize the duration of impacts as short-term (effects that may extend up to 3 years), long-term (effects that may extend between 3 years and 35 years or the life of the Project), or permanent (effects</p>

New York State Agency Comment	Response
<p>maritime users in the area. This depth reduces the risk of fishing gear interactions and mitigates the effects of electromagnetic fields (EMF) on sensitive species that inhabit and transit through the Project Area.</p>	<p>that extend beyond the life of the Project).</p>
<p>The Agencies continue to urge greater transparency and additional details on the Cable Burial Risk Assessment (CBRA) process and the anticipated need for deeper burial depths to minimize risks to commercial vessels operating and transiting within the Project area. Refer to the Kitty Hawk Offshore Wind Project COP Appendix J as a template for how to provide a qualitative CBRA during the COP phase. As a mitigation measure, developers should conduct stakeholder outreach on design changes to the anticipated burial depth based on information from the draft CBRA. The final CBRA should be accompanied by a comment-response matrix demonstrating that comments on the draft CBRA have been addressed and incorporated to the extent applicable before submitting to BOEM for approval.</p>	<p>Thank you for your comment.</p>
<p>Impacts from the OCS-DC/CWIS located in the Project lease area should be analyzed in greater detail and at a finer scale.</p>	<p>Thank you for your comment, additional details on the OCS-DC/CWIS have been added to the Final EIS, see Section 3.10.5.</p>
<p>Essential Fish Habitat (EFH) for eggs and/or larvae have been designated for 29 individual species of fish and invertebrates within the lease area (COP Appendix N1; Sunrise Wind 2022). The potential for adverse environmental impacts from a CWIS relates to entrainment and subsequent mortality of egg and larval stages of fish and invertebrates within the cooling system and thermal stress on all life stages from the discharge of heated effluent. Estimates of total anticipated mortality across all species should be provided, including invertebrates which are not currently analyzed in the COP. The analysis should also articulate the potential impacts to vulnerable species with low or declining stocks.</p>	<p>Entrainment is discussed in Section 3.10.5.2. Additional information can be found in the NMFS’s <i>Essential Fish Habitat Assessment for the Sunrise Wind Offshore Wind Project</i> (EFH Assessment) and Appendix B. To evaluate the potential entrainment during operational OCS-DC withdrawals, species abundance data was obtained from the NOAA National Centers for Environmental Information (NCEI) electronic database. This database include data collected by NOAA’s Marine Resource Monitoring, Assessment, and Prediction (MARMAP) program from 1977-1987 and by the Ecosystem Monitoring (EcoMon) program from 1995 through 2017 throughout the North Atlantic region. These data only include larval ichthyoplankton, as fish eggs are not identified to species. There is no abundance information available for invertebrates to calculate potential</p>



New York State Agency Comment	Response
	<p>entrainment or calculate of equivalent adults.</p>
<p>Installation of the CWIS within an area of high cod spawning activity increases the likelihood of long-term adverse impacts on early life stages and the viability of the species. Accordingly, impacts of siting the CWIS within Priority Area 1 on cod spawning activity and survival should be analyzed in greater detail. Furthermore, assessment of CWIS impacts on communities that rely on hard bottom habitat found in other priority areas should also be considered.</p>	<p>Section 3.10.5.2.2, <i>Offshore Activities and Facilities Entrainment</i>, contains a write up of mitigation measures designed to mitigate entrainment.</p>
<p>The Agencies acknowledge that BOEM was unable to analyze the use of closed-cycle cooling for the OCS-DC due to technological limitations. BOEM should consider adding the following new mitigation measures to reduce impingement mortality and entrainment of egg and larval stages. The Agencies are available to discuss and further refine these concepts with BOEM.</p> <p>i. Upgrade/retrofit the CWIS to a closed-cycle cooling system if the technology becomes available during Project operations.</p> <p>ii. Reduce the CWIS through-screen velocity below 0.5 feet/second, which is the threshold required for new facilities defined at 40 CFR §125.84(c). For example, Sunrise Wind models a velocity of 0.43 ft/s scenario, but it is unclear if this is the lowest feasible velocity (COP Appendix N1; Sunrise Wind 2022). iii. Reduce the CWIS water withdrawal, when feasible, during periods of peak egg and larval abundance within the area affected by the OCS-DC.</p>	<p>Table H-3 of Appendix H has been updated to include these mitigation measures.</p>
<p>Throughout the DEIS, BOEM uses the 100-year time horizon global warming potentials (GWP100) values; however, 20-year time horizon potentials (GWP20) values are cited for New York in Table 3.4.1-1. The Agencies recommend that GWP100 totals in the cited report be used, as it is currently misleading and presents New York as having high</p>	<p>Table 3.4-2 (previously Table 3.4.1-1) in the Final EIS was updated to reflect the 100-year time horizon global warming potential (GWP100) total for New York.</p>

New York State Agency Comment	Response
emissions rates.	
Sulfur hexafluoride (SF6) emissions are discussed as a greenhouse gas (GHG); however, there is no SF6 emissions estimates. The Agencies recommend that SF6 emissions estimates be included in the DEIS.	Sulfur hexafluoride (SF6) emissions are included in Sections 3.4.5.2.1 and 3.4.5.2.2 in the Final EIS (previously Sections 3.4.1.5.2.1 and 3.4.1.5.2.2 in the Draft EIS).
Throughout the discussion of GHG emissions in the DEIS, de minimis arguments are used that the Council on Environmental Quality recommends against in their guidance regarding climate change in National Environmental Policy Act (NEPA) reviews. The Agencies recommend that BOEM use the best available estimates for the Project emissions and apply the social cost, or SC-GHG, to each individual GHG.	An analysis of the social cost of greenhouse gas (SC-GHG) was included in Section 3.4.5.5.
The text discussing GHG emissions from onshore construction activities would be clearer if it expressly discussed New York emissions of carbon dioxide equivalent (CO2e), since a significant portion of onshore construction activities for the Project will take place in New York State. Specifically, we recommend revising Section 3.4.1.5.1.1 at pg. 3-17 as follows: “Climate change: GHG emissions would occur throughout the onshore construction phase; however, they would be small compared to total annual statewide emissions. CO2e emissions were estimated to range from 1,074 tpy (974.3 metric tpy) for emissions within 3 nm (3.45 mi; 5.6 km) of Connecticut to 32,893 tpy (2,9840.028 metric tpy) for emissions within 3 nm (3.45 mi; 5.6 km) of New York, to 73,202 tpy (66,407.7 metric tpy) for emissions within 3 nm (3.45 mi; 5.6 km) of Maryland (COP Appendix K, Sunrise Wind 2022).”	The text in Section 3.4.5.1.1 of the Final EIS was revised (previously Section 3.4.1.5.1.1 in the Draft EIS).
Bats (Section 3.5.1): This section states that “The Project would reduce the potential impacts to bats by conducting tree clearing during winter months to the extent practicable”. The Agencies recommend that this text be revised to reference the specific time period because March	Text in Section 3.6.5.1.1 has been revised as recommended. This edit was also made in the Section 3.8.5.1.1., under <i>Birds</i> .

New York State Agency Comment	Response
<p>should not be included. The NYSDEC “no tree clearing” window in Suffolk County occurs from March 1 – November 30.</p>	
<p>Section 3.5.2.3, Impacts of Alternative A – No Action on Benthic Resources, evaluates the potential impact of EMF on benthic communities, which could differ between high voltage alternating current (HVAC) and high voltage direct current (HVDC). The second paragraph of the EMF section states that, “EMF effects from these future projects on benthic habitats, EFH, invertebrates, and finfish would vary in extent and significance depending on... project-specific transmission design (e.g., HVAC or HVDC, transmission voltage)” and “EMF effects from future activities would be negligible; however, (Hutchison 2018; Hutchison 2020b) have observed behavioral responses in lobster that were exposed to an EMF from an HVDC cable in a controlled environment, meaning that higher level (e.g., minor or moderate) effects could result should future projects use HVDC transmission.” Given this information, the Agencies suggest impacts from EMF should be evaluated assuming HVDC technology as it may have higher level effects than HVAC on benthic resources. Additionally, multiple states, including New York, are beginning to require the use of HVDC technology, and therefore it is reasonable to assume HVDC will continue to be used for future projects.</p>	<p>Updated information was added to Section 3.7.3.1, under <i>Benthic Resources</i>.</p>
<p>Section 3.5.2.5 Impacts of Alternative B – Proposed Action on Benthic Resources notes that information from an EMF synthesis paper “concludes that while some studies have shown changes in individuals during laboratory studies, not enough information is available to determine how those changes may extend to the population or community level or ecological processes”, but then proceeds to state that “population-level effects on key invertebrate species are not expected and impacts are expected to remain negligible”. It is important to recognize that further in-situ, species-specific research is</p>	<p>Information was added from the Harsanyi et al. 2022 paper and the impacts have been updated to minor to moderate, depending on AC versus DC cables.</p>

New York State Agency Comment	Response
<p>needed in order to fully assess and understand EMF impacts on finfish, benthic communities, and marine protected species. Accordingly, the Agencies urge BOEM to take a more cautious approach when considering EMF and not rule out the possibility of unforeseen higher level effects.</p>	
<p>Birds (Section 3.5.3): Section 3.5.3.1.4 states that "... no bald eagle nests have been recorded" near onshore Projects components. The Agencies request this be corrected; bald eagles have been documented in the vicinity. There is a known bald eagle nest within 1.5 miles of onshore Project components in the Wertheim National Wildlife Refuge.</p>	<p>Thank you for your comment. The text has been revised as recommended.</p>
<p>Coastal Habitat and Fauna (Section 3.5.4): Verify if any facility improvements may be needed to support operations and maintenance (O&amp;M). Dredging, shoreline improvements, and new docks or piers that may be needed for the O&amp;M facility should be analyzed in this impact category.</p>	<p>Text has been added to revise/expand the description of the temporary landing structure in Sections 3.9.4 and 3.9.5 of the EIS. A temporary pile-supported trestle will be used to transfer construction equipment and materials to minimize the environmental impact to the extent practicable and provide the safest platform for the transfer of the construction equipment, materials, and activity of the crew.</p>
<p>Finfish, Invertebrates, and Essential Fish Habitat (Section 3.5.5): The DEIS states that " Sunrise Wind assumes up to 10 percent of the total [inter-array cable] IAC network would require boulder clearance and up to 5 percent of the total IAC network would require sand wave leveling prior to installation of the cables". The Agencies recommend adding a "Cable emplacement and maintenance" category to further analyze the potential impacts of sand wave leveling on finfish, invertebrates, and EFH. Particular emphasis should be given to potential impacts on squid spawning habitat and the need for scour protection and/or cable protection in these areas that would prevent sand waves from reforming, thereby representing a long-term habitat impact.</p>	<p>Potential impacts are discussed in Section 3.10.5.1.2, under <i>Finfish, Invertebrates, and Essential Fish Habitat</i>.</p>

New York State Agency Comment	Response
<p>Geographic analysis area (Section 3.6.1): The Agencies recommend that the range of states included in the commercial and for-hire fishing analysis be reduced to reflect the states with active commercial fishing in the Project. New York State has routinely commented that the range used to evaluate the average revenue and landings is too broad to evaluate a specific fishing area and leads to a diluted assessment of the overall effect on fisheries and fishing industries that may be affected by the Project. For comparison, BOEM analyzed a well-defined and appropriate Regional Fisheries Area in the Revolution Wind DEIS (see Revolution Wind DEIS, Figure 3.9- 2). Establishing that a project-specific Regional Fisheries Area should be the standard for all offshore wind environmental reviews. Fishermen operating off New York should be afforded a similar detailed analysis as those operating off Rhode Island and Massachusetts.</p>	<p>The GAA utilized in Section 3.6.1 for commercial fisheries and for-hire recreational fishing was established to capture a comprehensive view of all waters and states the Proposed Action may impact. Several species that may be present in the vicinity of the Lease Area are migratory and may move throughout the GAA over the course of the year. In addition, vessels may travel from ports and states throughout the GAA to fish the areas in and around the Lease Area. The Draft EIS provided revenue exposure by FMP Fishery to establish how these fisheries may be impacted and the associated impacts on commercial and for-hire recreational operations. Additional tables have been provided in the Final EIS that capture revenue exposure by port and state. Providing these additional tables further captures the impacts and allows for the identification of the areas that the Proposed Action may most impact.</p>
<p>For clarity, the impacts to commercial and for-hire recreational fisheries should be stated separately. That is, the FEIS should state specifically what the impacts to commercial fisheries would be and what the impacts to recreational for-hire fisheries would be for each of the alternatives. For example, the DEIS currently states that, “BOEM expects that the impacts resulting from the Proposed Action would be [sic] range from minor to major, depending on the fishery and fishing operation, with the overall impact on commercial fisheries and for-hire recreational fishing being moderate.” See also DEIS Table 3.6.1-23. As is, it is not clear whether the impacts to each of the commercial and for-hire recreational fisheries are expected to be “moderate,” or whether this is an aggregate or overall level of impact. For comparison, BOEM analyzed the potential impacts to these fisheries industries separately in the Empire Wind DEIS.5</p>	<p>The Comparison of Alternatives table (Table 3.14-24 of the Final EIS) has been updated to show impacts to commercial fisheries and for-hire recreational fishing separately for clarity.</p>

New York State Agency Comment	Response
<p>Relatedly, there is a discrepancy in the description of the Proposed Action’s impacts on commercial fisheries that should be resolved. In Section 3.6.1.5.5 of the DEIS it states: “BOEM expects that the impacts resulting from the Proposed Action would be [sic] range from minor to major, depending on the fishery and fishing operation, with the overall impact on commercial fisheries and for-hire recreational fishing being moderate.” However, in Section 3.6.1.9 on “Proposed Mitigation,” the DEIS states: “These measures, if adopted, would have the effect of reducing the overall moderate to major impact of the Proposed Action on commercial fisheries to minor to moderate.” The DEIS should clarify whether the impacts to commercial fisheries are moderate or moderate to major. Addressing the previous comment may bring the needed clarification.</p>	<p>The conclusion statements within Section 3.14 of the Final EIS have been updated to be consistent and clear throughout the section.</p>
<p>Furthermore, the analysis of potential impacts of the Project on fishing industries should include:</p> <p>i. A quantitative analysis of fisheries economic exposure along the export cable corridors and shoreside industries (e.g., processors, fuel suppliers, distributors). The Agencies suggest relying on the RIDEM 2017 analysis for the export cable corridors in federal waters. Revolution Wind, Vineyard Wind, and South Fork Wind included quantitative exposure analyses of the wind farm area, cable corridors, and shoreside industries, which set a precedent of analyzing the entire project area and full scope of potential upstream and downstream effects. BOEM’s draft fisheries mitigation guidance articulates the importance of developing accurate revenue exposure estimates in order to evaluate the potential for income losses to fishing industries and demonstrate the need for compensation. While neither the COP nor the DEIS currently provide baseline valuations for the export cable corridor or shoreside industries, calculated multipliers, such as those developed by NMFS as part of fisheries disaster situations, can be a</p>	<p>Due to the fact that the cable corridor impacts are temporary in nature during the construction period, BOEM has determined that a qualitative discussion is appropriate. In addition, the importance of the commercial fishing industry to shoreside services and industries is acknowledged as there are a variety of ports and shoreside businesses within this area. To that end, the analysis includes an extensive analysis of commercial fishing revenue exposure within the Lease Area.</p> <p>For the Final EIS, two additional tables have been included to outline and present revenue exposure by both port and state to better articulate the potential impacts related to the Proposed Action.</p>

New York State Agency Comment	Response
<p>useful proxy in the absence of direct economic information from industry participants. The Agencies recommend NYSDEC and NYSDOS be included in further coordination with BOEM on the specific multiplier that may be selected for this Project. Omitting the cable corridors and shoreside industries from this analysis would undervalue the revenue exposure estimate and is a departure from BOEM’s past EISs.</p>	
<p>The analysis of potential impacts of the Project on fishing industries should include:</p> <p>ii. Careful consideration of methods to adjust for inflation over time and address regional and fishery-specific variation in shoreside industries. For example, a 2020 report by Murray et al provided estimates of value added for summer flounder that suggest a multiplier of 12X, and a 2020 study from Scheld9 reported a multiplier for longfin squid of 7.64X.</p>	<p>Historic revenue by FMP fishery and species have been adjusted for inflation. Revenue exposure estimates for the Proposed Action, including two new tables that present revenue exposure for the Lease Area specific to ports and states, are presented in nominal dollars.</p>
<p>The analysis of potential impacts of the Project on fishing industries should include:</p> <p>iii. Compensation for gear loss and damage that extends through operations and beyond if Project infrastructure is not fully removed.</p>	<p>Ørsted has a corporate policy and procedure that would be implemented to compensate commercial and for-hire recreational fishing entities for gear loss as it relates to Project activities. This applicant-proposed mitigation measure (APM) was added to the text within Final EIS Section 3.14 and is noted in Appendix H (Table H-1) as APM CFHFISH-06. Compensation for gear loss is also noted under "Other Agency-proposed Mitigation Measures" in Table H-3 as proposed by BOEM and Bureau of Safety and Environmental Enforcement (BSEE).</p>
<p>The analysis of potential impacts of the Project on fishing industries should include:</p> <p>iv. A compensation value that is inclusive, fair, and equitable so that demonstrated impacts can be offset regardless of where fishermen land their catch or where shoreside businesses are located.</p>	<p>The revenue exposure analysis provided in Section 3.14 for the Proposed Action is comprehensive and conservative in nature. It provides an estimate of overall revenue exposure by FMP, as well as new tables within Section 3.14 that provide a breakdown by port and state. This provides an understanding of what areas and</p>

New York State Agency Comment	Response
	communities may be most impacted by the Proposed Action with respect to the fishing industry.
<p>The analysis of potential impacts of the Project on fishing industries should include:</p> <p>v. A Record of Decision that emphasizes the need for a compensatory mitigation claims process that is transparent, data-driven, and uncoupled from states' Coastal Zone Management Act (CZMA) reviews and, in so doing, provides compensation for demonstrated impacts to communities and businesses in a fair and equitable manner.</p>	BOEM has proposed a mitigation measure for fisheries compensation, to include commercial and for-hire recreational fishing operations and their associated shoreside services. BOEM intends to make it a condition of COP approval.
<p>Environmental Justice (EJ) (Section 3.6.4): This section misstates the criteria New York State uses to define an EJ community, but correctly applies those criteria in the subsequent analysis. The first paragraph of Section 3.6.4.1.1 should be amended as follows:</p> <p>New York identifies an EJ community, as a Potential EJ Areas (PEJA) which are U.S. Census block groups that meet one of more of the following criteria (NYSDEC 2022):</p> <p>(1) at least 52.42 percent of the population in an urban area reported themselves to be members of minority groups, (2) at least 26.28 percent of the population in a rural area reported themselves to be members of minority groups, and (3) at least 22.82 percent of the population in an urban or rural area has household incomes below the federal poverty level.</p>	The text within Section 3.17.1.1 (previously Section 3.6.4) was updated to correctly outline New York State's definition of an environmental justice community.
<p>NYSDOS and NYSDEC are mentioned as BOEM's anticipated enforcing agencies related to conditions in the Article VII Order. This includes Measure Number/Name: WQ-04, EN-20, GEN-21, and GEN-25, but there may be other instances. The Agencies request that NYSDOS and NYSDEC be removed as they are not the appropriate enforcing agencies. Instead, the NYS Public Service Commission should be</p>	Appendix H has been revised to name the New York State (NYS) Public Service Commission as the enforcing agency for these mitigation measures instead of New York State Department of State (NYSDOS) and New York State Department of Environmental Conservation (NYSDEC).



New York State Agency Comment	Response
<p>named as the enforcing agency for these mitigation measures.</p>	
<p>The Agencies recommend developing and implementing a comprehensive Mariner Communication and Outreach Plan that covers all project phases from pre-construction to decommissioning. There is a proposed fisheries communication and outreach plan (See ID CFHFISH-02) and a communication plan (see GEN-14), and these should be expanded to include coordination with other mariners, including the commercial shipping industry and other recreational users who would also benefit from this coordination and may not be captured in the currently proposed fisheries plan. A shallow-buried cable of 3ft depth presents an increased risk to ocean users because it would occupy heavily trafficked routes and traditional fishing grounds for squid, surfclam/ocean quahog, and scallop. Additionally, if periodic cable exposures occur, New York shipping and fishing industries could be directly affected by the increased risk of interactions, displacement during maintenance and remedial burial activities, and increased vessel traffic and noise during maintenance. NYSDOS recommends the following as components of an effective mariner communication plan to ensure existing uses are accommodated to the maximum extent possible:</p>	<p>Appendix H has been revised to include a mitigation measure for a Mariner Communication Plan.</p>
<p>(cont.) i. Pre-COP consultation with potentially affected stakeholders on initial routing and results of the draft Navigation Safety Risk Assessment;</p>	<p>This has been added to Appendix H under the Mariner Communication Plan.</p>
<p>(cont.) ii. During Project design, coordinating in-water construction activities to avoid and minimize disruptions;</p>	<p>This has been added to Appendix H under the Mariner Communication Plan.</p>
<p>(cont.) iii. At least 90 days prior to commencing in-water construction activities in any construction season, consultation with stakeholders on an approximate schedule of activities and existing uses within the Project area. Make good faith efforts to accommodate those existing</p>	<p>This has been added to Appendix H under the Mariner Communication Plan.</p>

New York State Agency Comment	Response
uses. The results of these good faith consultations can be summarized in a report and submitted to the federal agency(ies) prior to the start of each construction season;	
(cont.) iv. Following COP approval, notice of proposed changes which have the potential to impact fishing or maritime resources or activities;	This has been added to Appendix H under the Mariner Communication Plan.
(cont.) v. Notices to commence construction activities, conduct maintenance activities, and commence decommissioning;	This has been added to Appendix H under the Mariner Communication Plan.
(cont.) vi. Status reports during construction with specific information on construction activities and locations for upcoming activities in the next 1-2 weeks;	This has been added to Appendix H under the Mariner Communication Plan.
(cont.) vii. Post-construction notice of: (i) all cable protection measure locations (including protection type and charted location); (ii) any areas where the identified burial depth is less than target burial depth; and (iii) other obstructions to navigation created by the Project; and (cont.) viii. Post all notices described above to the Project website with information on how to opt-in for alerts.	This mitigation has been added to Appendix H, additionally BOEM addresses these concerns as terms and conditions to the approval of the Construction and Operations Plan.
The Agencies recommend new mitigation measures be incorporated to address impacts to long-standing ocean uses of importance to New York. The following are suggested measures consistent with the Empire Wind DEIS:  i. Sunrise Wind will report fishing gear and anchor strike incidents that fall below or are not captured by the regulatory thresholds outlined in 30 CFR §§ 585.832 and 585.833. reports will be filed annually during construction and decommissioning, and every 5 years during operations.	Thank you for your comment, BOEM will take this into consideration.

New York State Agency Comment	Response
<p>(cont.) ii. Sunrise Wind’s Cable Installation Plan or Cable Burial Risk Assessment will:</p> <ol style="list-style-type: none"> <li>1. Depict precise planned locations and burial depths of the entire cable system;</li> <li>2. Detail how cable installation and operation will be managed to ensure disruption to maritime uses is minimized along the cable route; and</li> <li>3. evaluate the need for additional mitigation measures, including deeper burial depth to mitigate risks to ocean users, including crossing existing and proposed Traffic Lanes and Fairways</li> </ol>	<p>A copy of the Cable Burial Plan shall be submitted by Sunrise Wind as part of their Facility Design Report (FDR)/Fabrication and Installation Report (FIR) that depict precise locations and burial depths of the entire cable system. The plan shall be reviewed by United States Coast Guard (USCG) and BOEM.</p>
<p>(cont.) iii. Sunrise Wind will establish an adaptation fund to equip vessel operators with necessary safety training and equipment, including suitable marine vessel radar, where appropriate.</p>	<p>Requiring the establishment of such a fund is not consistent with BOEM policy, and therefore is not included in the EIS.</p>
<p>Section 3.4.2.1.1: Carmans River is incorrectly spelled as "Carmens River".</p>	<p>The spelling of Carmans River in Section 3.5.1.1 was corrected.</p>
<p>Section 3.5.1.4, pg. 3-67: New York State Department of Environmental Conservation (NYSDEC) is incorrectly spelled as “New York State Department of Economic Conservation (NYSDEC)”.</p>	<p>Spell out was removed as the acronym was defined earlier in the text.</p>
<p>Section 3.5.1.5.1.1, pg 3-67: NYSDEC is incorrectly spelled as “NWDEC”</p>	<p>Text in Section 3.6.5.1.1. has been revised as recommended.</p>
<p>On pg. 3-79, the Agencies request that “Sound” in the following sentence be deleted as there is no overlap with the Long Island Sound. “The SRWF and the SRWEC would cross waters that transition from the continental slope and coastal areas near Long Island Sound extending out onto the OCS.”</p>	<p>This has been corrected.</p>

**O.4.2.4. Rhode Island Coastal Resources Management Council**

No comments were provided on the Sunrise Wind Draft EIS.

## O.5. Responses to Lessee Comments on the Draft EIS

**Table O-9. Responses to Comments from Sunrise Wind LLC [BOEM-2022-0071-0226]**

Lessee Comment	Response
<p>In the introduction (DEIS Section 1.3, page 1-10), the DEIS states: "The analyses in this Draft EIS will inform BOEM's decision under 30 CFR 585.628 for the COP that was initially submitted in September 2020 and later updated with current information on June 7, 2021, October 29, 2021, and April 8, 2022." Sunrise Wind notes that this submission history does not include the December 18, 2020, the August 23, 2021, or the most recent August 19, 2022, versions of the COP. We provide below a few key examples where use of outdated COP versions in the DEIS have led to inaccurate PDE details. Appendix A to this letter provides other noted instances of this discrepancy occurring in the DEIS.</p>	<p>The statement has been corrected, and the Final EIS has been updated to reflect the information in the August 2022 COP as well as the updates from the September 2023 COP.</p>
<p>Several figures in the DEIS and supporting appendices are not based on the most recent, August 2022, version of the COP, and thus do not align with the current PDE. For example, Figure 2.1.2-3 (DEIS page 2-11), although produced in October 2022, shows an Onshore Interconnection Cable Route, Onshore Transmission Cable Route, Landfall horizontal directional drill (HDD), and Sunrise Wind Export Cable (SRWEC) that are all outdated and do not reflect current Project design (see for comparison, COP Figure 1.1-2).</p>	<p>Figures 2.1-1 and 2.1-3 in the Final EIS (previously Figures 2.1.2-1 and 2.1.2-3 in the Draft EIS) have been revised to reflect the information in the August 2022 COP and September 2023 COP.</p>
<p>Some of the PDE details presented in various tables and text also do not reflect current parameters. For example, Table ES-1 (page ES-v) and Section 3.6.9.5.2.2 (page 3-745) identify the total structure height of the Offshore Converter Station (OCS-DC) as up to 361 ft (110.0 m). The current Project design is up to 295 ft (90 m) (see COP Table 1.2-1).</p>	<p>The structure height of the OCS-DC has been corrected throughout the Final EIS.</p>

Lessee Comment	Response
<p>Many of the textual descriptions stem from earlier COP submissions and therefore do not reflect narrowing of PDE assumptions, such as the reduction from two to one Landfall HDD in New York State waters (DEIS pages 3-96 and 3-99); revision to Temporary Landing Structure language (see examples on DEIS pages 3-183, 3-185, and 3-218 versus COP Section 3.3.10-2); or revision to the write-up concerning munitions and explosives of concern/unexploded ordinances (MEC/UXO) clearance activities (DEIS page 3-282 versus COP Section 3-37 and COP Appendix I4), which is not cited in the DEIS.</p>	<p>The Landfall HDD, temporary landing structure language, and UXO language was updated to reflect the information in the August 2022 COP.</p>
<p>Several of the characterizations of information are also not based on the most recent Project details and assessments. For example, the discussion of electromagnetic fields (EMF) on DEIS pages 3-299 and 3-300 cites Appendix J (Sunrise Wind 2021j) and uses results from that version; however, this appendix, along with several others, was updated and resubmitted with the August 2022 version of the COP. For example, COP Appendices J1, J2, M1, M2, M3, P1, V, X all have 2022 versions but are cited throughout the DEIS to their earlier 2020 or 2021 versions.</p>	<p>Thank you for your comment. The Final EIS has been updated.</p>
<p>The DEIS's Executive Summary does not include the U.S. Environmental Protection Agency (EPA) as a cooperating agency. The EPA is a cooperating agency for the Project that will rely on the DEIS to support its decision on Sunrise Wind's application for a National Pollutant Discharge Elimination System (NPDES) individual permit for a new facility and should be included in the discussion. Similarly, the EPA NPDES permit should be described in Sections 1.2 and 2.1 in the FEIS.</p>	<p>The <i>Executive Summary</i>, Section 1.2, and Section 2.1 of the EIS have been updated to include USEPA as cooperating agency.</p>
<p>The DEIS contains language on page 2-27 concerning ongoing UXO surveys; at the time of the DEIS publication, Sunrise Wind had completed its UXO surveys. Of the potential MECs surveyed, only one was confirmed as a UXO. The As Low and Reasonably Practicable (ALARP) Certificate Report is due in early 2023. Sunrise Wind respectfully requests that some of the language that trends UXO ambiguity and incomplete surveys be</p>	<p>Thank you for your comment. Section 2.1.2.1.2.6 has been updated with the As Low as Reasonably Practicable (ALARP) results.</p>

Lessee Comment	Response
<p>removed and be replaced in the FEIS with language that indicates that surveys were completed with one UXO finding. In addition, results from the ALARP Certificate Report will be available and should be included in the FEIS. We think that these facts will further influence how potential UXO mitigations may be viewed in the FEIS.</p>	
<p>In the DEIS, BOEM provides anticipated impact determinations of the Project on Endangered Species Act (ESA)-listed species that could be present in the Project Area. Such determinations are a component of the informal consultation process pursuant to Section 7(a)(2) of the ESA and typically only included in Biological Assessments (BA) for the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS), consistent with the approach taken for the Empire Wind, Revolution Wind, Ocean Wind 1, and South Fork Wind Projects. The inclusion of these determinations in the BA is typically accompanied by detailed justification for the determinations, including discussion of potential impact producing factors (IPF) on listed species. For example, to help inform determinations for listed bird species, BOEM generally follows the parameterization of the Band Model5 to evaluate the risk of bird collision with operating wind turbine generators (WTG) in offshore wind farms and provides the results of the model in the BA as supporting evidence for the determinations. In the DEIS, BOEM cites only the inclusion of supporting information in the relevant taxa sections to support the expected determinations for listed species. For these reasons, Sunrise Wind believes that the inclusion of any reference to listed species impact determinations in the DEIS, even if just indicated as ‘anticipated,’ causes confusion, lacks precedent and is unnecessary when such determinations are included in the USFWS and NMFS BAs. We respectfully request that BOEM removes the sections pertaining to anticipated impacts to ESA-listed species in the Sunrise Wind FEIS</p>	<p>The language was updated to remove the determinations.</p>

Lessee Comment	Response
<p>In addition, the IPF / significance criteria for bats provided in the Sunrise Wind DEIS and the South Fork Wind FEIS are similarly defined (Sunrise Wind DEIS Table G-5, page G-6 and South Fork Wind FEIS Table 3.4.1-1, page H-35). However, the South Fork Wind FEIS concludes, and the USFWS concurred (March 2021) that the South Fork Wind Project may affect, but is not likely to adversely affect, the northern long-eared bat (NLEB), whereas the Sunrise Wind DEIS (Section 3.5.1.5.4) states that the Proposed Action would likely adversely affect but not jeopardize the continued existence of NLEB. Based on the similar impact assessment between Sunrise Wind and South Fork Wind for impacts to bats, and similar proposed mitigation measures for NLEBs, Sunrise Wind believes the same conclusion should be made for the Proposed Action. Furthermore, Sunrise Wind completed bat acoustic surveys in areas of the Proposed Action requiring clearing in Summer 2022, and no NLEBs were detected during the surveys. The acoustic bat survey report was provided to the USFWS on October 26, 2022, and to BOEM on October 27, 2022.</p>	<p>The Biological Assessment provided a thorough analysis of potential impacts to northern long-eared bats and concluded that the Project may affect but is not likely to adversely affect this species. The determination in the Final EIS will be updated to match the Not Likely to Adversely Affect (NLAA) determination.</p>
<p>Text throughout the DEIS describes Alternative C-2 as excluding the 8 WTG positions identified in Alternative C-1 from development and removing an additional 12 WTG positions from the Priority Areas and relocating them to the eastern side of the Lease Area. This description should be revised in the FEIS to indicate that up to 8 WTG positions would be excluded and up to 12 WTG positions would be removed and relocated to align with the language used to describe Alternative C-1 (i.e., "exclusion of up to 8 WTG positions from development...") and to allow flexibility to utilize the maximum number of turbines in the Project's PDE.</p>	<p>We added "up to" for the number of WTGs considered for Alt C-2.</p>
<p>Sunrise Wind is supportive of a preferred alternative identified in the FEIS that maintains flexibility to use the maximum amount of turbine locations that are anticipated to be technically feasible to install, that meets the Project's purpose and need, and that also minimizes impacts to benthic habitat and resources. Based on additional review of geophysical and</p>	<p>Alternative C-3 has been developed to address the possibility of technical infeasibility of these positions.</p>



Lessee Comment	Response
<p>geotechnical (G&amp;G) data throughout the Lease Area and in particular the presence of glauconite sands, Sunrise Wind anticipates foundation installation may result in pile refusal at several of the 102 proposed WTG positions in the PDE, as well as at several of the 12 positions along the eastern portion of the Lease Area identified in Alternative C-2. Sunrise Wind continues to evaluate the results of completed G&amp;G surveys and plans on proposing an alternative layout that is aligned with the objectives of DEIS Alternatives C-1 and C-2 while minimizing the risk of pile refusal. This alternative layout would minimize benthic habitat impacts to the largest extent practicable, within the technical limitations of foundation installation.</p>	
<p>In Section 3.5.2.1.2, the DEIS states: "Benthic sediment mapping classified areas as glacial moraine and till based on morphological interpretation of an irregular seafloor (COP, Appendix M3; Sunrise Wind, 2021)." The use of the term 'glacial moraine' here is not accurate. As described in Appendix M3: "The Sunrise Wind Farm (SRWF) and SRWEC–OCS are located immediately south of submerged end moraines, in what was an extensive glacial outwash plain. Glacial moraine habitats were not observed within the Study Area. The glacial deposits found at SRWF are termed Glacial Drift and are stratified deposited of glacial sediments that have been re-worked and sorted by the movement of water. These glacial deposits are not considered to be surface expressions of unstratified moraine deposits associated with submerged glacial moraine complexes (Sunrise Wind LLC 2021b). However, Glacial Drift provides a similar benthic habitat for invertebrates and demersal fish as do unconsolidated glacial moraine habitats found to the north of the SRWF." Sunrise Wind respectfully requests this sentence be revised in the FEIS to indicate that glacial drift, and not glacial moraine, was classified in the Project Area.</p>	<p>The term "glacial moraine" was revised to "glacial drift" and defined as stratified and sorted materials.</p>

Lessee Comment	Response
<p>Several locations in the DEIS (pages 3-82, 3-87, 3-96) state that "eelgrass was found along the south shore of the channel" when discussing site-specific survey results. Eelgrass was not found in this location during the 2020 benthic survey conducted at eight stations in the Intracoastal Waterway (ICW) or during the submerged aquatic vegetation (SAV)-focused surveys conducted in Summer 2020 and Fall 2022 with towed video. While SAV was mapped along the south shore by the New York Department of State's 2018 LISS Estuary Habitat data set, eelgrass was not found in the more recent aforementioned surveys. SAV bed distribution frequently changes from year to year, particularly when large beds are not established, and water quality and clarity are highly variable. Sunrise Wind is committed to avoiding impacts to SAV and would avoid and minimize impacts to this sensitive habitat to the extent practicable. Sunrise Wind asks that text stating that eelgrass was found along the south shore of the channel during Sunrise Wind's field surveys be excluded from the FEIS.</p>	<p>The Final EIS characterized the eelgrass as potentially occurring in the Project Area, and noted that it was found in 2018, but has not been confirmed in a more recent survey (2022). Sunrise Wind has described pre-Project surveys for the area that would confirm its presence prior to surface disturbance.</p>
<p>Sunrise Wind provided maximum acres of potential permanent and temporary disturbance for each Project component (foundations, scour protection, cable protection, seafloor clearance, etc.) in the COP Appendix M3 - Benthic Habitat Mapping to Support EFH Consultation. Table 3.5.2-3 on page 3-96 of the DEIS presents acres of potential disturbance for Project component areas divided by short- and long-term disturbance types. However, no information is provided as to which components were combined and tallied for each disturbance type and, although some values are close to those presented in Appendix M3, potentially important discrepancies remain. Sunrise Wind respectfully requests information on the methodology used by BOEM to calculate the values provided in this table. Sunrise Wind welcomes discussion and offers support in providing disturbance calculations developed in a consistent manner as needed.</p>	<p>Table 3.7-4 has been replaced with a compilation of Table 4-1 from the August 2022 Appendix M-3. It uses the same breakdown for short-term (temporary) and long-term (permanent) as Appendix M-3.</p>

Lessee Comment	Response
<p>Page 3-175 of the DEIS states: "Coastal habitats associated with the landfall/ICW work areas on Fire Island include maritime beaches, dunes, and grasslands. Coastal habitats in the landfall/ICW work area on the mainland include beach and dune communities located along the south side of the mainland and associated interdunal areas." This text should be expanded upon in the FEIS to provide clarification that the Landfall/ICW Work Areas on Fire Island would be largely confined to the existing, paved Smith Point County Park parking lot, Burma Road, and maintained recreational fields located west of William Floyd Parkway. The ICW Work Areas on the mainland would be confined to the paved parking lot associated with Smith Point Marina and paved portions of East Concourse Road. No portion of the ICW or Landfall HDD Work Areas would impact vegetation on maritime beaches, dunes, or grasslands.</p>	<p>The following text has been added to Section 3.9.1.10 of the EIS, "Landfall/ICW Work Areas on Fire Island would be largely confined to the existing, paved Smith Point County Park parking lot, Burma Road, and maintained recreational fields located west of William Floyd Parkway, with the exception of cable stringing on the beach." The added text follows the paragraph beginning with "The Landfall/ICW Work Area on the mainland is primarily developed....".</p> <p>Section 3.9.1.9 of the Final EIS recognizes the high use of the proposed HDD stringing area and the unlikely presence of rare, threatened, and endangered (RTE) plants and presence/absence of protected species, which will be confirmed prior to construction activities. The potential impacts referenced are documented in COP Appendix L, summarized in Final EIS Tables 3.9-1 and -2, and described in the draft United States Fish and Wildlife Service (USFWS) Biological Assessment and NMFS EFH Assessment. The COP (Section 4.4.4.1) states "Additionally, HDD conduit stringing may occur on Burma Road within Smith Point County Park; this action would require welding and short-term placement (i.e., 2–3 weeks per duct) of assembled HDD conduit sections in approximately 3,500 ft (1,067 m) of coastal habitats (including Maritime Beach) before the duct is maneuvered offshore and installed via HDD."</p> <p>In addition, COP Appendix L, Figure 3, Sheet 16 of 16 , and COP Figure 3.3.3-3 indicate undeveloped areas in line with or directly proximate to proposed construction areas. Figure 3.3.3-3 of the COP shows pipe stringing area along dune edges. Appendix B of Appendix L in the COP (Stantec 2022), indicates that maritime beach habitats are intercepted by the Project and that "all proposed cable routes would intercept maritime beach, a rare</p>

Lessee Comment	Response
	<p>and significant coastal community." Also described in Section 3.9.1.9, listed plant species (seabeach amaranth and sandplain gerardia) are not present within a mile of planned activities for HDD/stringing activities, although the presence of vegetation is not precluded. The statement, "No portion of the ICW or Landfall HDD Work Areas would impact vegetation on maritime beaches, dunes, or grasslands" is not supported by the COP or Appendix L.</p>
<p>Page 3-186 of the DEIS states: "Because HDD conduit stringing on the beach would result in the loss of any vegetation it intercepts, there is potential for disturbance of seabeach amaranth if it is present." Conduit stringing would occur on Burma Road within Smith Point County Park. Sunrise Wind feels it should be clarified in the FEIS that (as noted in COP Section 4.4.1.1), the beach area where the HDD conduit stringing is proposed consists of an unvegetated sand beach that is well-used by pedestrians, and portions are open to vehicular traffic. Vegetated sand dunes would not be affected by the HDD conduit stringing activities. Further, seabeach amaranth was not observed during field surveys, and suitable habitat was not identified in the Landfall Work Area.</p>	<p>Pipe stringing is not included in the designated work area; it parallels the shoreline in maritime beach habitat. It is recognized that the area is well traveled and RTE species are unlikely. However, species surveys will be completed prior to construction activities to confirm presence/absence of vegetation in general and RTE species. The COP (section 4.4.4.1) states, "Additionally, HDD conduit stringing may occur on Burma Road within Smith Point County Park; this action would require welding and short-term placement (i.e., 2–3 weeks per duct) of assembled HDD conduit sections in approximately 3,500 ft (1,067 m) of coastal habitats (including Maritime Beach) before the duct is maneuvered offshore and installed via HDD." If this is inaccurate, this response should be revisited.</p>
<p>Page 3-186 also states: "Along most of the transmission route, localized adverse impacts to habitats would occur due to trenching, vegetation removal, soil compaction, surface water runoff or pooling, and potential inadvertent burial of vegetation and fauna during construction ROW and locations where the transmission cable installation changes between trenching and HDD." As noted in the DEIS, less than 1 percent of the onshore route is located outside of existing disturbed rights-of-way, and most of the onshore transmission facilities would be installed below paved locations associated with parking lots and roadways. As a result, Sunrise Wind feels this statement is inaccurate as it relates to onshore</p>	<p>We proposed the sentence, "Along most of the transmission route..." be followed with clarification such as, "However, less than 1 percent of the onshore route is outside existing rights-of-way (ROWs), as described in Section 3.9.5.1.1. Impacts to these areas are deemed negligible but are included to ensure all potential impact-producing factors (IPFs) are addressed."</p>

Lessee Comment	Response
<p>construction impacts and should not be included in the FEIS.</p>	
<p>Page 3-187 of the DEIS states: "Presence of structures relevant to coastal habitats and fauna include onshore transmission cables and associated facilities along the proposed transmission route; the presence of these structures is expected to convert existing habitats to hard-top and/or impervious surfaces for cable protection and facilities such as the converter station (cable installation is addressed above). The OnCS-DC would be constructed in a compatible area of industrial or commercial land use and would therefore have negligible impacts on coastal habitats and fauna." No portion of the Onshore Transmission Cable or Onshore Interconnection Cable would result in the conversion of existing vegetated habitats to hard-top or impervious cover types. The OnCS-DC has been sited in a location that contains minimal vegetation and is dominated by existing pavement and various buildings. As a result, Project-wide, there would be a trivial net increase in impervious cover and/or conversion of vegetated habitats; therefore, Sunrise Wind feels these details should not be included in the FEIS.</p>	<p>The potential impacts referenced are documented in COP Appendix L, summarized in Draft EIS Tables 3.5.4-1 and -2, and described in the draft USFWS Biological Assessment and NMFS EFH Assessment. COP Appendix L, Figure 3, Sheet 16 of 16, and COP Figure 3.3.3-3 indicate undeveloped areas in line with or directly proximate to proposed construction areas. COP Table 3.3.2-5 identifies potential impacts to greenways along the onshore transmission corridor as well. Impacts to these areas are deemed negligible but are included to ensure all potential IPFs are addressed. No changes have been made.</p>
<p>Page 3-187 also states: "traffic from onshore vehicles may impact coastal habitats and fauna due to physical disturbance, traffic detours to more sensitive alternative routes, including at Smith Point County Park beach access locations, resulting in disturbance of maritime dune and grassland habitats and could impact the federally threatened seabeach amaranth." This section also notes traffic delays may cause travelers to detour through sensitive areas such as the Wertheim National Wildlife Refuge (NWR) where coastal habitats and vegetation would be disturbed by increased traffic noise, debris from road and vehicles, and potential collisions with wildlife or off-road detours that damage vegetation. Sunrise Wind believes it is unlikely that Project activities would have any measurable impact on traffic patterns within sensitive areas such as Smith Point County Park or the Wertheim NWR. Sunrise Wind has implemented</p>	<p>The EIS states, "The OnCS-DC would be constructed in a compatible area of industrial or commercial land use and would therefore have negligible (i.e., not measurable, parentheses added) impacts on coastal habitats and fauna." However, there will be temporary and potential impacts due to construction, as documented in COP Appendix L, summarized in Draft EIS Tables 3.5.4-1 and -2, and the USFWS Biological and NMFS EFH Assessments, which describe 2.3 acres of tree removal for the facility (also in Sections 3.6 and 3.8, <i>Bats</i> and <i>Birds</i>). Regarding traffic: in the absence of traffic studies to document the amount of traffic present with and without the Project construction, potential impacts described are considered relevant. Therefore, there are no data to support "no" rather than "negligible" effect,</p>

Lessee Comment	Response
<p>avoidance and minimization measures, including:</p> <ul style="list-style-type: none"> <li>• time of year restrictions for work at Smith Point County Park and Smith Point Marina to avoid rare, threatened, and endangered species and avoid the summer tourist season;</li> <li>• the use of agency-approved Maintenance and Protection of Traffic Plans;</li> <li>• the commitment to maintain vehicular and pedestrian access at existing travel ways; and</li> <li>• coordinating Project construction schedules with the applicable roadway and management authorities to minimize work during periods of high-traffic volumes to the extent feasible.</li> </ul>	<p>and no changes to the EIS are needed.</p>
<p>Project and public access would be maintained and confined to lawfully developed roads and access ways; therefore, no new disturbance of maritime dune, beach, or grassland habitats would occur due to Project construction on Fire Island. Additionally, any temporary increase of vehicle traffic through the Wertheim NWR would be limited to travel along Montauk Highway (New York County Route 80), a paved roadway that spans the majority of Long Island, New York and is already subject to significant traffic volumes. Furthermore, due to the north/south orientation of Carmans River and associated wetlands, there are no additional opportunities for east to west vehicle travel near the Project Area. As a result, Sunrise Wind believes this assessment of traffic impacts should be revised in the FEIS to reflect the Project details provided herein.</p>	<p>COP Appendix L documents potential impacts to maritime dune, beach, or grassland habitats, also summarized in Tables 3.9-1 and 3.9-2 (previously Tables 3.5.4-1 and 3.5.4-2 of the Draft EIS). Tree removal and other construction-related disturbance would occur during installation at Carmans River (COP Section 3.3.2.3). These potential impacts are included to ensure all potential IPFs are addressed. Primary IPFs relevant to coastal habitats and fauna in the GAA are listed in Table G-8 of Appendix G. Impacts to these areas (with respect to developed roads and access ways) are deemed negligible and additional information regarding potential impacts would not reduce the impact level of the proposed activities reported in the Draft EIS. No changes made.</p>
<p>Additionally, page 3-183 of the DEIS provides an overview of potential impacts to SAV and benthic habitats from installation of the Temporary Landing Structure. This section should be updated in the FEIS to reflect the current modified design of the Temporary Landing Structure, the duration the structure would be installed, and the results of the Fall 2022 SAV-</p>	<p>Sections 3.9.4 and 3.9.5 have been revised to reflect new information, including the selection of a pile-supported trestle for the transfer of the construction equipment and materials that would minimize the environmental impact to the extent practicable and provide the safest platform for the transfer of</p>

Lessee Comment	Response
<p>focused surveys, which found no significant eelgrass populations in the location selected for the Temporary Landing Structure.</p>	<p>the construction equipment/materials and activity of the crew. The section will also include information from the draft EFH Assessment (December 2022), which was updated with October 2022 SAV surveys using underwater video and a global positioning system (GPS)-enabled Seaviewer drop camera along east-west and north-south transect lines in the proposed temporary landing site, where no significant populations of eelgrass were found (see EFH Assessment for details).</p>
<p>Page 3-196 of the DEIS states that "SRWF overlaps Cox Ledge." However, the Sunrise Wind Farm does not overlap with, but is instead proximal to, Cox Ledge. This should be corrected in the FEIS. The location of Cox Ledge is accurately portrayed in Figure 2.1.3-1 of the DEIS.</p>	<p>Figure 2.1-6 depicts the distance of the SRWF from Cox Ledge based on available data. The full extent of where Cox Ledge extends to is not clear. Language describing the distance between the SRWF and Cox Ledge and/or the statement "adjacent to" has been added to Section 2.1.3, Section 3.7.1.1, and Sections 3.10.1, 3.10.5, 3.10.6, and 3.10.7.</p>
<p>The species listed as expected to occur in the SRWF and SRWEC in Section 3.5.6.1 and Table 3.5.6-1 do not align with those included in the COP and Incidental Take Application (ITA). It is important that the FEIS evaluate potential impacts to the same species as the ITA so that NMFS can use the EIS to comply with NEPA in issuing the Letter of Authorization. For example, the DEIS does not include the blue whale as likely to occur within the Project Area. However, the COP indicates that the blue whale may occur within the Project Area. COP Appendix O1 states: "...due to their endangered status and because they have been detected in the SRWF area during acoustic surveys, blue whales were included in the acoustic assessment", which aligns with the ITA.</p>	<p>Blue whales have been added for consistency with the determinations made in NOAA's proposed LOA under the MMPA. Please note that the acoustic surveys the COP refers to detected blue whales but did not confirm that the whales were actually in the SRWF Project Area. The researchers of this study indicate that no blue whales were seen during the visual surveys and the far detection range of a blue whale vocalization (more than 200 km [124.3 mi]) suggest that the vocalizing blue whales were likely outside of the study area (Kraus et al. 2016).</p>
<p>Additionally, the DEIS lists the short-finned pilot whale as a species likely to occur within the Project Area. Both the COP and ITA characterize this species as having a 'rare' occurrence within the Project Area due to its distribution.<sup>6</sup> There is no additional data suggesting this species would have a likely occurrence within the Project Area. Therefore, it should not</p>	<p>The inclusion of both short-finned and long-finned pilot whales is consistent with the Incidental Take Authorization (ITA), which includes "pilot whales" and estimates take for this group. Sightings often cannot be confidently identified to the species level and are typically recorded as "pilot whales." BOEM includes</p>

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<p>be included as a potentially affected species. Finally, Sunrise Wind would like to point out a discrepancy between the DEIS and the ITA regarding Risso’s dolphin. The original ITA (May 2022) published on the NMFS website mistakenly excluded Risso’s dolphin. However, after subsequent discussions with NMFS, Risso’s dolphin was added to the ITA when the Updated Density and Take Estimates Memo (December 2022) was submitted to NMFS and is part of the Draft ITAs proposed by NMFS.<sup>7</sup> Sunrise Wind agrees with Risso’s dolphin being included in the FEIS. NMFS intends to include this species within the Proposed Rule for consistency with the FEIS.</p>	<p>short-finned and long-finned pilot whales as potentially occurring in the Project Area based on the following information: uncertainty of the exact ranges of these species, potential for range shifts due to climate change, difficulty distinguishing between these species in the field, recent sightings of short-finned pilot whales in the nearby New York Bight, and tagged short-finned pilot whales detected as far north as Nantucket Shoals and Georges Bank (see Thorne et al. 2017; NYSEDA 2020; Payne and Heinemann 1993; Rone et al. 2012). NMFS's 2021 stock assessment for short- and long-finned pilot whales lists three stranding in Massachusetts and references Pugliares et al. (2016) for another stranding. Both blue whales and pilot whales are generally observed off the shelf break or further offshore. Both species are characterized as rare within the Project Area. We find the approach of excluding short-finned pilot whales is inconsistent with the approach requested by NMFS for blue whales.</p>
<p>Section 3.5.6.5.2.2 of the DEIS categorizes non-impulsive sound produced by WTGs as having a ‘minor to long-term’ effect on marine mammals. However, the language justifying this designation does not specifically describe the low-frequency (LF) sound produced by WTG operations and the resulting potential impact on LF cetaceans as a hearing group. Sunrise Wind agrees that any potential impacts to LF cetaceans would be minor. However, we believe it is important also to note that the impact would be localized, as the sounds would only be received in certain areas around each WTG foundation. Because the animals are continually moving, they would only be within the area of potential impact for a brief period of time.</p>	<p>The analysis already describes WTG operating noise as low intensity and highly localized. We removed "and long term" from the impact level determination in Section 3.11.5.2, as the duration of the sound is already considered in the analysis.</p>



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<p>Sunrise Wind provided an Updated Marine Mammal Density and Take Estimates Memo in December 2022 (December 2022 Memo) and requests that applicable DEIS text be updated in the FEIS with these more current data. For example, the December 2022 Memo includes an updated vessel trips table (Table 1). The number of vessel trips in the December 2022 Memo differs from what is included in the DEIS (pages 3-293 and 3-302). Specifically, the DEIS states that “...five vessel types are currently being considered for O&amp;M of the SRWF (three for routine activities and two for non-routine activities” (page 3-302). However, Sunrise Wind expects only two vessels to be used for O&amp;M including crew transport vessels and service operation vessels, which is specified in the December 2022 Memo.</p>	<p>Updates were made based on the most recent March 2023 memo.</p>
<p>Additionally, the estimated number of animals that may experience post-traumatic stress and behavioral disturbance from up to three UXO/MEC detonations in the SRWF without attenuation (DEIS page 3-283, Table 3.5.6-6) are incorrect and should align with the values included within the December 2022 Memo. to this letter provides additional instances of this type of discrepancy in the DEIS that were identified during Sunrise Wind’s review.</p>	<p>Updates were made based on the most recent sound analysis.</p>
<p>Sunrise Wind believes the reliance on the National Oceanic and Atmospheric Administration’s (NOAA) Marine Recreational Information Program (MRIP) data cannot be used as a method to draw direct impact conclusions. The statement “across the five states that would most likely utilize fishing areas around the Lease Area, New York had the highest number of trips, followed by New Jersey and Massachusetts. Most of these trips were typically within state waters and from shore” (DEIS page 3-399) could overestimate the impacts of Lease Area activities to for-hire recreational fishing activity from all states, especially New York and New Jersey, two states that are quite distant from the Lease Area. It is not a sound assumption to say fishing trips in federal waters would take place in the Lease Area based on MRIP data; as is indicated in the DEIS, MRIP data</p>	<p>Section 3.14, <i>For-Hire Recreational Fishing</i>, notes there are limitations to the MRIP data as there is no special information on where the fishing trips took place relative to the Lease Area. This is the best information available at this time and is meant to provide general angler efforts.</p>

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<p>must be carefully caveated, as the MRIP does not contain a way to determine locations within its data. Similarly, trips occurring in state waters cannot occur in the Lease Area. Sunrise Wind invites reconsideration of the distribution of fishermen by state to ensure methodological shortfalls within the data do not misattribute any impacts, and requests clarification of the term 'fishing areas around the Lease Area'.</p>	
<p>Sunrise Wind believes the reliance on experience relative to the Block Island Wind Farm's (BIWF) popularity with recreational fishermen may overestimate impacts to commercial fishermen. The DEIS relates that commercial fishermen perceive recreational fishermen would crowd the Sunrise Wind Lease Area, based on one example. The Sunrise Wind Farm (SRWF) is not a direct parallel to the BIWF. For example, the SRWF is not very close to an otherwise popular near-shore fishing destination. Similarly, the SRWF is not very close to a principal recreational fishing port. Making such a comparison does not acknowledge external motivators of recreational fishermen, some of which are: fuel cost, cost of time to navigate to the Lease Area, and the desirability of bypassing dozens of closer similar structures from previously constructed wind farms (e.g., South Fork, Revolution, Vineyard Wind) in order to arrive at the SRWF.</p>	<p>Acknowledgment of differences in recreational fishermen usage between the BIWF and the SRWF has been included in the Final EIS analysis in Section 3.14.</p>
<p>Sunrise Wind respectfully notes an apparent catch-22 in the logic chain relating to impacts due to entanglement and gear damage/loss. DEIS page 3-429 indicates some recreational fishermen would find fishing harder, because their target species might use a structure to break off from hooks and lines. Insofar as these fish are attracted or otherwise present in the Sunrise Wind Lease Area as a result of a structure, or that targeting these fish is more efficient due to a structure, we request the inherent hazards with fishing around a beneficial structure not be included as an adverse impact.</p>	<p>This language in the Final EIS identifies both the positive aspects of creating structure for fish and the negative aspect of potential gear damage/loss to fishermen. Providing both conditions is important to consider and is consistent with other BOEM EISs.</p>

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<p>Sunrise Wind requests that the long-term beneficial impacts that offshore wind-driven port use and expansions will have on commercial fisheries and recreational vessels over the long term also be discussed in the FEIS, including:</p> <ul style="list-style-type: none"> <li>• Port infrastructure improvements that will be utilized not only by the offshore wind industry, but the maritime industry at large;</li> <li>• Maintenance dredging and/or deepening activities that will aid safe navigation for fishing and recreational vessels; and</li> <li>• Increased local revenues from use of dockside services such as repairs, fueling, and provisioning.</li> </ul>	<p>Acknowledgement of some of the indirect benefits to other industries as a result of port use and expansions was in the Draft EIS and expanded slightly within the Final EIS based upon the comment provided and additional available information.</p>
<p>We recognize that loss of insurability is a fear for many people, however Sunrise Wind is unaware of any insurer that has indicated they would deny insurance or raise rates for fishermen and requests that this lack of substantiation be discussed in the FEIS. Sunrise Wind welcomes additional conversations with these companies and would seek to address their concerns and would seek to mitigate some fishermen's' individual risks through our fisheries compensation measures.</p>	<p>Thank you for your comment. The text has been revised to clarify this is a concern of the fishing industry, but to date, specific instances have not been identified.</p>
<p>Section 3.6.2.5.2.2 of the DEIS states that lighting of offshore facilities and structures from the Proposed Action is anticipated to have “negligible to moderate, long-term impacts on above ground historic properties” (page 3-477). While describing cumulative impacts of the Proposed Action, Section 3.6.2.5.4.2 (page 3-482) concludes that: "Lighting from the Proposed Action combined with ongoing and planned activities could have negligible to minor impacts on cultural resources depending on the scale and intensity, largely determined by the number of visible lights and their proximity to resources, of the impacts and the unique characteristics of individual historic properties." It does not seem reasonable that the impact of just the Proposed Action from vessel and structure lighting would be negligible to moderate (page 3-477), whereas the cumulative</p>	<p>Cumulative impacts of the Proposed Action with respect to lighting were found to be consistent in BOEM's analysis.</p>

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<p>impact of the Proposed Action combined with other activities would have a negligible to minor impact (page 3-482). Sunrise Wind recommends revising the impact determination in the FEIS for the Proposed Action from lighting of vessels and structures to be negligible to minor, particularly given the significant reduction in lighting due to the implementation of an aircraft detection lighting system, which would limit the activation of the aviation obstruction lights on WTGs to only occur when aircraft approach the structures (i.e., approximately 1.4 hours per year), as well as Sunrise Wind’s commitment to light and mark WTGs in accordance with FAA Advisory Circular 70/7460-1L (2018), as recommended by BOEM’s Guidelines for Lighting and Marking of Structures Supporting Renewable Energy Development.</p>	
<p>Sunrise Wind requests that BOEM re-evaluate potential impacts on demographics, employment, and economics and update the FEIS accordingly. In accordance with the COP and given numerous economic benefits and environmental protection measures, the Proposed Action is anticipated to have negligible adverse impacts and minor beneficial impacts on demographics, employment, and economics.</p>	<p>Additional information has been included in Section 3.16 of the Final EIS based upon comments received and new information that has become available. The conclusions of both potential adverse and beneficial impacts are summarized in Table 3.16-12.</p>
<p>Sunrise Wind agrees with the following conclusions in Section 3.6.4.6.5 (page 3-609): “Considering the combined impacts of all IPFs, BOEM anticipates that the Proposed Action would have overall negligible to moderate impacts on all (Environmental Justice) EJ populations, and therefore BOEM determined that impacts of the Proposed Action on low-income and minority populations would not be disproportionately high and adverse and could be avoided or reduced with AMPs or would be unavoidable but not disproportionately high and adverse.” However, Sunrise Wind respectfully requests additional clarification and/or justification in the FEIS to support other statements that say the impacts would fall disproportionately on EJ communities. It does not appear that the DEIS fully takes into account the impacts of existing activities already</p>	<p>Acknowledgement of the development and implementation of an Onshore Maintenance and Protection of Traffic Plan (Appendix H, Table H-1, APM Number GEN-15) has been included in Section 3.17, <i>Environmental Justice</i>, where appropriate.</p>

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<p>occurring in EJ communities (at ports, for example), the presence of non-EJ block groups in the Project Area, or measures Sunrise Wind would take to minimize impacts to EJ communities (e.g., traffic control plans). For example, page 3-582 states: "Based on the geographic extent of onshore construction impacts relative to the location of EJ populations, BOEM concludes that EJ populations would experience disproportionately high and adverse effects related to construction, O&amp;M, and decommissioning of onshore infrastructure."</p>	
<p>Another example is on page 3-595, which states: "The OnCS–DC, Onshore Transmission Cable and Onshore Interconnection Cable are located within, adjacent to, or within the vicinity of several Census Block Groups that are considered EJ communities (as shown Figure 3.6.4-1), and therefore have an adverse disproportionate impact on these communities; however, these activities would be short-term nature and are considered to be a minor disproportionate, adverse impact." Figure 3.6.4-1 shows that the onshore facilities would also traverse non-EJ block groups, indicating that the minor, short-term air quality impacts would not necessarily be disproportionate on EJ areas.</p>	<p>The presence or potential for an adverse impact on a non-environmental justice community does not necessarily negate the potential for a disproportionate impact on an adjacent environmental justice community. The environmental justice analysis both identifies where communities with environmental justice populations exist, as well as what adverse impacts may be present, which can help inform mitigation and outreach.</p>
<p>In addition, page 3-603 states: "Overall, the presence of structures in the offshore environment from the Proposed Action will have minor to moderate impacts on marine businesses (Section 3.6.1 Commercial Fisheries and For-Hire Recreational Fishing and Section 3.6.8 Recreation and Tourism), resulting in long-term, continuous, minor impacts on EJ populations due to the impact on low-income workers in marine industries and low-income residents who rely on subsistence fishing." This part of the analysis examines fishing communities in an EJ context. However, it is unclear how the impact analysis on the fishing community differs from the analysis conducted in Section 3.6.1 of the DEIS, which focuses on the impacts to Commercial and For-Hire Fisheries.</p>	<p>Many individuals working within the marine and fisheries industries within the GAA could be considered individuals who may be considered low-income earners in the context of the Project's environmental justice population. The environmental justice analysis takes into account conclusions from the commercial fisheries and for-hire recreational fishing analyses and evaluates the potential impact with respect to vulnerable populations. To that end, if there is a potential long-term, continuous impact to commercial fisheries and for-hire recreational fishing operations, that could ultimately have a negative impact on some of the individuals employed in that industry.</p>

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<p>On page 3-679, the DEIS says the Proposed Action will create potential major adverse impacts on USCG Search and Rescue (SAR) operations. Elsewhere in the document (e.g., page 3-675, Table ES-2), these impacts are listed as moderate adverse. Similarly, adverse impacts from Alternatives C-1 and C-2 are described as major to USCG SAR operations on page 3-681 and page 3-683, but moderate on page 3-682 and 3-683. Sunrise Wind believes a major adverse rating is incorrect here, and even the basis for moderate adverse requires clarification.</p>	<p>Potential impacts on USCG Search and Rescue (SAR) operations from Alternative B, Alternative C-1, and Alternative C-2 are all described as moderate adverse impacts. BOEM has described the cumulative impact (impacts from ongoing and planned activities, including offshore wind and the alternatives) on USCG SAR operations as major adverse impacts. The installation of such a large number of WTGs through the GAA would hinder USCG SAR operations across a larger area, potentially leading to increased loss of life. Major impacts for other uses would be unavoidable even with EPMs, where additional mitigation could be required. While Sunrise Wind can utilize EPMs to minimize but not fully resolve the impacts of the alternatives analyzed in this EIS, the cumulative impact of all reasonably planned future activities cannot be minimized with EPMs to the level that it should be defined as moderate.</p>
<p>Page 3-677 states: "...the presence and layout of large numbers of WTGs could make it more difficult for SAR aircraft to perform operations, necessitating changes in USCG SAR operational procedures, leading to less effective search patterns or earlier abandonment of searches." Sunrise Wind respectfully disagrees with this statement both on a technical level, and in the way it misconstrues the USCG's stated posture toward SAR operations in wind farms.</p>	<p>This statement has been revised in Section 3.20.1.2.</p>
<p>Search effectiveness is measured by the probability of a sensor detecting a particular object, placed against the probability of the object being in a particular area while that area is being searched. Aeronautical hazards, such as WTGs, are not considered in modifying sensor effectiveness: fatigue, weather induced conditions, and moon illumination are. Search planners create search patterns using a limited selection of line and box searches in a computer program. The program is structure-agnostic and does not recognize land/water boundary. Detection models are similarly</p>	<p>At this time, BOEM does not have the information to evaluate the impact of WTGs on the effectiveness of USCG measures, so the text in Section 3.20.5.2.2.1 has been revised to reflect this. USCG SAR activities could be hindered within the SRWF due to navigational complexity and safety concerns operating among WTGs. The USCG may need to adjust its SAR planning and search patterns to accommodate the WTG layout. These changes in SAR procedure have the potential to result in adverse impacts, as it</p>

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<p>limited, and make broad assumptions based on limited empirical testing of a small set of possible drift objects, sensors, and human performance data. The search planning software produces an optimal search pattern based on given inputs, but planners often de-optimize the plan; for example, the planning software may attempt to place a vessel search partially on land or may not consider the human physical and visual impacts to searching against the waves or the sun’s glare. Finally, search assets rarely perform the search exactly as planned, often varying from the optimal speed, courses, and duration of search. The USCG has no definitive method to track actual search effort other than relying on voice reports from the scene; there is no ‘black box’ assessing actual searches conducted, and therefore it is difficult for the USCG to say with certainty that one search is more or less effective than another</p>	<p>could complicate the SAR process.</p>
<p>Sunrise Wind also notes that USCG SAR policy does not allow for ineffective searches to be suspended due to potential ineffectiveness. Inadequate or ineffective searching for any reason generally results in more searching for longer periods of time, generally until the probability of surviving at sea is more than exhausted. Conversely, excellent search conditions under ideal circumstances might result in quicker search suspension. In discussing search suspension, the USCG’s Addendum to the National SAR Supplement cautions against non-aggressive search prosecution or minimal effort, even in the face of objective risks, such as nighttime and weather.</p>	<p>Thank you for your comment.</p>
<p>Sunrise Wind also notes that the Massachusetts and Rhode Island Port Access Route Study (MARIPARS) specifically calls out the 1x1 nm grid layout as being permissive to USCG SAR operations. “One NM spacing between WTGs allows aircrews to safely execute turns to the adjacent lane using normal flight procedures in visual conditions. On scene conditions or WTG spacing less than 1 NM may require aircrews to deviate from normal flight procedures or to transit the entire length and conduct</p>	<p>Thank you for your comment.</p>

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<p>turns outside of the wind farm. One NM spacing may allow sufficient navigational room for aircrews to execute USCG missions in diverse and challenging weather conditions or deal with an aircraft emergency and/or navigational malfunction.”</p>	
<p>For many SAR missions, there may be no impact, and it can be anticipated the USCG would assign appropriate alternate or additional resources and resource time to mitigate any issues. Search planners can account for operator fatigue or increased drift of a search object while a resource is off task by assigning more resources or search time.</p>	<p>Potential impacts to USCG SAR operations from Alternative B, Alternative C-1 and Alternative C-2 are all described as moderate adverse impacts. BOEM has described the cumulative impacts, which is defined as the impacts as a result of ongoing and planned activities including offshore wind and the alternative analyzed, to USCG SAR operations would be major adverse impacts. The installation of such a large number of WTGs through the GAA would hinder USCG SAR operations across a larger area, which has the potential to lead to increased loss of life. Major impacts for other uses are defined as impacts that would be unavoidable even with EPMs, where additional mitigation could be required. While Sunrise Wind can utilize EPMs to minimize, but not fully resolve the impacts of the Alternatives analyzed in this EIS, the cumulative impact of all reasonably planned future activities cannot be minimized with EPMs to the level that it should be defined as moderate.</p>
<p>Sunrise Wind anticipates the USCG would itself adapt to or use Sunrise Wind components to aid in its mission. For example, a boater in distress can quickly pass their position to the USCG via radio by referencing the nearest wind tower. Very high frequency coverage of the area, in partnership with Sunrise Wind, is increased, allowing authorities to be alerted to, and indirectly communicate with, distressed mariners. Trained mariners associated with the Wind industry would be routinely present in the Lease Area and are able to monitor communications and potentially render aid. The USCG’s 2022 memo, Guidance for Response Operations in and Around Wind Farms, alludes to all these facts and more, addressing</p>	<p>Thank you for your comment. It has been noted and has been included in ongoing discussions with USCG.</p>



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<p>positive and negatives of operations within windfarms, including mitigators, and does not conclude any major impacts or place any proscriptive policy concerning SAR operations.</p>	
<p>Sunrise Wind believes these facts, balanced against the perceived risk to aircraft access, reduce the impact rating to moderate, and not major. The impact can be summed as creating some more work for search planners than before, akin to planning a search near shore, and more careful operations for crews piloting aircraft or vessels searching within the windfarm, possibly requiring increased attention to operational risk mitigation. We request that the wording that suggests helicopters would not access Sunrise Wind be clarified in the FEIS, and that search planning effectiveness be considered impacted, and to a much lesser extent, search execution.</p>	<p>Potential impacts to USCG SAR operations from Alternative B, Alternative C-1 and Alternative C-2 are all described as moderate adverse impacts. BOEM has described the cumulative impacts, which is defined as the impacts as a result of ongoing and planned activities including offshore wind and the alternative analyzed, to USCG SAR operations would be major adverse impacts. The installation of such a large number of WTGs through the GAA would hinder USCG SAR operations across a larger area, which has the potential to lead to increased loss of life. Major impacts for other uses are defined as impacts that would be unavoidable even with EPMs, where additional mitigation could be required. While Sunrise Wind can utilize EPMs to minimize, but not fully resolve the impacts of the Alternatives analyzed in this EIS, the cumulative impact of all reasonably planned future activities can not be minimized with EPMs to the level that it should be defined as moderate.</p>
<p>Sunrise Wind notes that Table H-1 of the DEIS Appendix H, Mitigation and Monitoring, is titled 'Applicant Proposed Measures'. However, while there are similarities to many of the listed measures, as written, they are not verbatim from the Project's COP environmental protection measures tables (e.g., ES-1) or other supporting appendices (e.g., Protected Species Mitigation and Monitoring Plans [COP Appendices O2 and O3]; Post-construction Avian and Bat Monitoring Framework [COP Appendix P2]). They do instead appear to align more closely with the Table H-1 mitigation measures from BOEM's DEIS for the Ocean Wind Project. For example, measure BENTH-04 states: "Perpendicular crossings of sand ridges and troughs by IAC would be minimized." This aligns with the Ocean Wind</p>	<p>Appendix H has been revised to address this comment.</p>

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<p>Project where such seafloor features exist. However, these features were not identified for the Sunrise Wind Project and should not be included in the FEIS.</p>	
<p>Other examples include Measure Bird-02 on page H-8, which proposes to “...evaluate avian use by conducting digital aerial pre-construction surveys for raptor nests, wading bird colonies, seabird nests, and shorebird nests during nesting periods,” and Measure TCHF-03 on page H-7, which states: “During construction and O&amp;M, surveys will be conducted for seabeach amaranth for the entire Project footprint during the growing season of May 15 – November 30, &lt;1 week before start of Project activities.” These measures were not proposed in the COP and therefore should not be included in Table H-1. Fisheries Monitoring measures related to eDNA Sampling, Glider-Oceanography, and Pelagic Fish on page H-47 are also not relevant to Sunrise Wind and should not be included in the FEIS.</p>	<p>Appendix H has been revised to reflect the mitigation measures proposed by Sunrise Wind and has removed those from Table H-1 that were not included in the COP.</p>
<p>Measure CFHFISH-04 on page H-14 states: “...at least 90 days prior to inter-array cable corridor preparation and cable installation (e.g., boulder relocation, pre-cut trenching, cable crossing installation, cable lay and burial) and foundation site preparation (e.g., scour protection installation), the Lessee must provide DOI with a boulder relocation plan.” This measure appears to belong in Table H-2, as this is also not an applicant-proposed measure. Further, BOEM requested that Sunrise Wind provide a Boulder Relocation Plan in January 2023, which Sunrise Wind has since provided. Therefore, this measure should be removed from the FEIS.</p>	<p>Table H-1 of Appendix H has been revised to remove this mitigation measure as an APM.</p>
<p>The text introducing Table H1 (DEIS Appendix H, page H-1) says: “As part of the Project, Sunrise Wind has committed to implementing applicant-proposed measures (APMs) to avoid, reduce, mitigate, or monitor impacts on the resources discussed in Chapter 3 of the Draft EIS. These APMs are described in Table H-1 and assessed as part of the Proposed Action.” As demonstrated by the above examples, Table H-1 does not consistently</p>	<p>Table H-1 has been revised to reflect the COP.</p>

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<p>reflect applicant-proposed or even necessarily appropriate measures, and as such, Sunrise Wind prefers if the measures listed in the FEIS were taken directly from those committed to in the COP and supporting appendices.</p>	
<p>Mitigation for Oceanographic High Frequency Radars Measure Number 2 on page H-51 lists options that have been identified to mitigate operational impacts on oceanographic high-frequency radars. In principle, Sunrise Wind can agree to data sharing with the radar operators as a mitigation, among other potential mitigations, but respectfully requests that limits be placed on the terms "and other oceanographic data," "In the public domain," and "operational state." Based on this paragraph, it is unclear what information radar operators need, and some of this data, especially hub-height wind speed and operational data, may be proprietary and therefore unsuited for open public access. We request these terms be clarified in the FEIS.</p>	<p>Appendix H has been revised in response to this comment.</p>
<p>Coordination with Federally Recognized Tribal Nations Measure Number 7 on page H-67/68 states: "No later than 90 calendar days after COP approval, the Lessee would contact the federally recognized tribal nations in government-to-government consultations with BOEM for the Project in order to solicit their interest in participating as active monitors on board vessels during construction and/or maintenance activities..." Sunrise Wind does not object to soliciting interest from federally recognized Tribal Nations in participating as active monitors onboard vessels during construction and/or maintenance activities. Additional information would be required from the interested federally recognized Tribal Nations to best accommodate any concern or designate which activities are to be monitored. Sunrise Wind is committed to providing a safe working environment and strives to minimize and mitigate all potential hazards. The offshore working environment presents a unique set of circumstances and</p>	<p>Appendix H has been revised to reflect this comment.</p>

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<p>specialized training is required to ensure the safety and well-being of all people present at the work site. As such, Sunrise Wind’s ability to grant requests for access to construction and/or maintenance vessels would depend on several constraints, including Health, Safety, and Environment (HSE) requirements, vessel berthing availability, and applicable insurance liabilities for Project-owned vessels and/or contracted vessels. Furthermore, HSE requirements that apply to those aboard a construction and/or maintenance vessel will include, at minimum, Project-approved trainings for sea survival and a physical examination by a licensed physician. Additional trainings would be required for access to WTGs or to transfer onto the construction vessel itself. Any onboard monitors would also have to commit to the anticipated duration at sea for the vessel’s activity (which can be up to four weeks) and be limited to the available berthings so as not to impact the availability to construction personnel. The proposed measure also states: “At a minimum, the Lessee must offer access to the following federally recognized tribal nations: Delaware Nation; Delaware Tribe of Indians; Stockbridge-Munsee Community Band of Mohican Indians; and Wampanoag Tribe of Gay Head (Aquinnah).” The list of tribal nations should be updated in the FEIS to reflect those federally recognized tribal nations invited to consult on the Sunrise Wind Project (i.e., the Mashantucket Pequot Tribal Nation, the Mohegan Tribe of Indians of Connecticut, the Narragansett Indian Tribe, the Mashpee Wampanoag Tribe, The Delaware Nation, the Delaware Tribe of Indians, the Shinnecock Indian Nation, and the Wampanoag Tribe of Gay Head (Aquinnah).</p>	
<p>It should be clarified that Sunrise Wind was assigned Lease OCS-A 0487 and the portion of OCS-A 0500 from Deepwater Wind New England, LLC and Bay State Wind, LLC, respectively.</p>	<p>Footnote provides clarity in the <i>Executive Summary</i> and Chapter 1, <i>Introduction</i>.</p>
<p>The Proposed Action is correctly identified elsewhere in the DEIS as up to a 1,034-MW facility. Please include up to’ when referring to the</p>	<p>Text has been revised to include "up to" when referring to the generating capacity of the Project.</p>

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generating capacity of the Project.	
Please include a reference to this guidance. This appears be from BOEM's Draft Guidelines for Mitigating Impacts to Commercial and Recreational Fisheries on the Outer Continental Shelf Pursuant to 30 CFR Part 585 (June 23, 2022). If so, it should be clarified that this is draft guidance and may be modified in response to public comment.	Added reference to draft that may change based on public comment.
Please consider clarifying if other projects also have overlapping construction schedules in 2025, as the Proposed Action includes construction activities in 2025.	The text in Sections 3.4.3.2, 3.5.3.2, and 3.17.4.2 have been updated to reflect the projects with planned overlapping construction schedules in 2024 and 2025. Additionally, Table 2.1-4 in Section 2.1.2.1.1.7 reflects the most recent updated construction schedule based on the EM&CP.
The COP does not specifically mention these Tier limits. This should be clarified.	The text in Section 3.4.5.1.1 was updated. The specific reference to tier limits was removed and it now simply states that equipment will meet applicable air emission standards.
This is inaccurate. It should be clarified that OCS-DC generators would also be used during planned maintenance shutdowns and testing periods.	The text in Section 3.4.1.5.1.1 (now 3.4.5.1.1 in the Final EIS) and Section 3.5.7.2.2 was clarified to state that diesel generators may be used during commissioning or emergencies on the WTGs as discussed in Section 4.3.4.3 of the COP, and to indicate that generators on the OCS-DC may be used during planned maintenance or shutdowns.
The proposed Temporary Landing Structure is temporary and would not be used during O&M activities. As such, the description should be clarified or removed.	The mention of docks in Section 3.5.5.2.1 (previously Section 3.4.2.5.2.1 in the DEIS) was meant as a general example of the type of structure that may be located in coastal waters and was not referring to the temporary landing structure. The text was removed.
It should be clarified that the proposed WTG model for the Project does not contain an emergency generator. If necessary during an emergency, a diesel generator may be brought to the site and located temporarily on each impacted WTG.	The text in Section 3.5.7.2.2 (previously Section 3.4.2.5.2.2 in the Draft EIS) regarding the emergency generator was clarified.

Lessee Comment	Response
<p>The ESA listing status for NLEB and tri-colored bat are not up to date. Any references to the 4(d) rule for NLEB are no longer appropriate and should be removed. It should also be noted that any tree-removal temporal restrictions would minimize risk to both species.</p>	<p>The text in Section 3.6.5.1.1 has been revised as recommended.</p>
<p>Please clarify this inconsistency.</p>	<p>The text regarding the cumulative impacts to bats was updated. The correct impact level should be negligible to minor.</p>
<p>Text under the Presence of Structures subheading states: "...adverse impacts to bats from collision would be minor and long-term." Would be a 'negligible' or 'negligible to minor' (and not a minor impact) for the Proposed Action considering that the DEIS notes the use of echolocation to avoid structures and states that impacts related to collision mortality cannot be quantified.</p>	<p>We agree that the impact level determination should be negligible to minor, and the text has been updated accordingly in Section 3.6.5.2.2.</p>
<p>This 10-mile buffer refers to the area considered as the geographic analysis area by the DEIS, but it does not equate to the area sampled for site-specific results for the Project. This should be clarified.</p>	<p>Text was revised in Section 3.7 to "For the assessment of future offshore activities, the analysis area was expanded to include an approximately 10-mi (16-km) buffer to allow broader characterization and variation of the surrounding habitat using findings from prior and ongoing studies of benthic environments in the Southern New England region More specific analysis is supported by the site-specific surveys conducted within the SRWF Lease Area."</p>
<p>This is incorrect. The G&amp;G surveys covered this buffer for the SRWEC, but not the ICW or the Lease Area. The origin of the 10-mi buffer is not clear; it is not in Appendix M1 as cited in the DEIS.</p>	<p>Replaced text in Section 3.7.1.1 with updated definition of the study area from the Aug 2022 COP: "The Benthic Habitat Study Area is inclusive of the areas Sunrise Wind surveyed for siting the SRWF in the Lease Area, the SRWEC–OCS, the SRWEC–NYS, and ICW HDD. The SRWEC–OCS and SRWEC–NYS Study Areas are corridors that were surveyed to support siting of the export cable bundle (Sunrise Wind 2022 COP, Appendix M3)."</p>

Lessee Comment	Response
Environmental protection measures related to benthic habitat are included in COP Section 4.4.2.3 and do not specifically mention turbidity controls. Please clarify to align with the correct applicant proposed measures.	Turbidity control was removed from Section 3.7.5.1.1 and updated with language from the August 2022 COP.
Alternative C-1 does not change the number of proposed WTGs or their generating capacity, so this statement should be revised.	The statement was revised to clarify that Alternative C-1 eliminates WTG positions.
BOEM should clarify the spatial area around each WTG used to identify boulder density, as a 250-km <sup>2</sup> area around each WTG equaling an 8.92-km radius circle around each WTG. The PDE only includes boulder clearance within a 220-m radius (0.15 km <sup>2</sup> ) around WTG positions.	The density of boulders is expressed using the units of boulders/250 km <sup>2</sup> that was used in the data in the earlier versions (See Figure 3.7-1 in Final EIS). Boulder densities for WTG positions (Appendix B) are still in this set of units- so no changes have been made to the numbers.
These alternatives do not reduce the number of WTGs; therefore, these statements should be revised. Further, the following clarifications should be made for Alternative C-2: Due to the increased distance from the OCS-DC of the up to 12 relocated positions, additional IAC could be needed. However, this may vary, depending on the final layout under the Alternative B Proposed Action. The up to 8 WTGs would only be removed from Priority Area 1, and the up to 12 relocated positions would be relocated from Priority Areas 1, 2, 3, and/or 4.	The text was revised to clarify that Alternative C-1 does not reduce the number of positions.
This is a slightly different description of how areas for prioritization were identified for Alternative C-1 in Section 3.5.2.6 on page 3-114, which states that "NMFS identified priority areas for habitat conservation based on backscatter data". BOEM should clarify how areas for prioritization were identified and keep consistent description	Text was added to Section 3.7.6, Alternative C-1.
Sunrise Wind suggests including mention in the Proposed Mitigation Measures Section (and/or elsewhere where BOEM determines relevant) that 3 potential WTG positions within the uniform east- west/north-south grid (1 x 1 nm spacing) located in Priority Area 1 in the northwest corner	Thank you for your comment. BOEM has noted the reduction in impacts due to exclusion of development of several WTGs as a result of installation constraints.

Lessee Comment	Response
of the Lease were removed by Sunrise Wind from consideration in the PDE to reduce benthic habitat impacts.	
Sunrise Wind did not propose to perform these surveys. This text should be removed.	Noted. Text was removed from Section 3.8.5.1.
There are no cofferdams or defined beach work areas included in the Project. This statement should be revised to "Noise from installation of the casing pipe or sheet piles..." to more accurately reflect potential activities in the PDE.	Text in Section 3.8.5.1 has been revised to "Noise from installation of the casing pipe or sheet piles..."
This statement should be revised to clarify that no on-beach work (i.e., between the back dune and mean low water) would occur April 1 through August 31. Construction activities could occur during this time in areas that are not on the beach.	Text in Section 3.8.5.1 has been revised to include "no on-beach construction activities (i.e., between back dunes and mean low water) are scheduled to occur during the roseate tern and piping plover breeding periods (i.e., April 1 through August 31)," as recommended.
Development is regulated in this area, but it is not prohibited. Sunrise Wind's application for a Core Preservation Area Compelling Public Need and Hardship was granted in April 2022.	Thank you for your comment. The following change has been made to Section 3.9.1: Replaced "Development is prohibited in the designated Central Pine Barrens Core Preservation Area." with "Development in the designated Central Pine Barrens Core Preservation Area is regulated, but it is not prohibited. Sunrise Wind's application for a Core Preservation Area Compelling Public Need and Hardship was granted in April 2022." The link to the approval is: <a href="https://documents.dps.ny.gov/public/MatterManagement/MatterFilingItem.aspx?FilingSeq=303480&amp;MatterSeq=64180">https://documents.dps.ny.gov/public/MatterManagement/MatterFilingItem.aspx?FilingSeq=303480&amp;MatterSeq=64180</a> .
Sunrise Wind requests the table be revised to state "None observed, potential habitat at landfall/ICW study area but outside of landfall work area and ICW work area" to reflect the field results more accurately.	Thank you for your comment. Table 3.9.2 (previously Table 3.5.4.2) has been revised as requested.
Thirty-eight percent seems high. Please clarify if percentages reflect the refined workspace.	The 38.3 percent reflects 39.3 acres of designated habitats (Significant Coastal Fish and Wildlife Habitats [SCFWH], significant natural communities, and Critical Environment Areas



Lessee Comment	Response
	[CEAs]) of the total 102.7-acre footprint of onshore facilities, including transmission line, substations, converter station, HDD/ICW work areas, and splicing vaults. This information is provided in Table 3.9-4 (previously Table 3.5.4-4 of the Draft EIS). No changes have been made.
<p>Sunrise Wind did not propose in its COP any plant-specific time of year restrictions related to these activities. Please clarify to align with the correct applicant proposed measures. Other time of year restrictions (i.e., those for nesting shorebirds and summer tourism) would overlap with most of the seabeach amaranth growing season and provide protection measures.</p>	<p>The reference to the plant-specific time-of-year restrictions is based on the draft Biological Assessment for impacts to USFWS-listed species for SRW, which states "Time-of-year restrictions for certain work activities (e.g., HDD conduit stringing) will be applied to the extent practicable to avoid or minimize direct impacts to sandplain gerardia, seabeach amaranth, and their habitat during construction of the landfall and onshore facilities. If work is anticipated to occur outside of these time-of-year restriction periods, coordination with state and federal agencies will be accomplished to develop construction monitoring and impact minimization plans or mitigation plans, as appropriate." The Final EIS will be revised based on the final Biological Assessment/Biological Opinion as needed.</p>
<p>It should be noted that the Project has proposed a 20-ft operational corridor for onshore facilities, all references to a 60-ft corridor should be revised. Also, totals provided in the Project footprint discussion (Section 3.5.4.5.1.1) do not match those provided in Section 3.5.4.5.2.1.</p>	<p>This has been updated to a 30-ft (9.1-m) operational corridor based on the new 2023 COP. Sections have been edited to match.</p>
<p>The text reports the cod spawning period as December through May. This does not match what is reported in the two studies that were cited. Dean et al 2020 described the spawning period as occurring from November through March, with peak spawning from December through February. Langan et al. 2020 described cod spawning as occurring from late December through mid-February based on the back-calculated growth rates of larvae collected in Narragansett Bay.</p>	<p>The text was updated in Section 3.10.1.3 to describe spawning in the SRWF area from October through March as described in Van Hoeck et al. 2023.</p>

Lessee Comment	Response
<p>It is not clear in the text describing the IPFs associated with the Proposed Action what the impact level determination is for seafloor disturbance and sediment suspension and deposition. Impacts are described as 'low' or 'small'. There is no clear designation of a minor or moderate impact for these two IPFs- this may be important as these two IPFs specifically relate to the difference between the impact determinations for the Proposed Action and Alternative C options. Similarly, it is not clear in text describing the IPFs associated with the Proposed Action what the impact level determinations are for accidental releases during onshore O&amp;M; or for offshore O&amp;M cable maintenance, light, and noise.</p>	<p>Impact levels associated with the Proposed Action were reviewed and updated.</p>
<p>No gillnet sampling is proposed in the Project's Fisheries and Benthic Monitoring Plan (COP Appendix AA1), so this statement should be removed.</p>	<p>The reference to gillnet sampling has been removed.</p>
<p>As the discharge of cooling water is not an accidental occurrence, this section should be re-labeled.</p>	<p>The IPF was changed to "Discharges" in Section 3.10.5.2.2.</p>
<p>This discussion should be updated in the FEIS to indicate the status of surveys that have already begun (or may have begun prior to the FEIS):</p> <p>Acoustic telemetry receivers were deployed in the Lease Area (for highly migratory species) in spring 2022 and tagging will begin in 2023;</p> <p>Acoustic telemetry receivers were deployed along the SRWEC-NYS in summer 2022; tagging of sharks, elasmobranchs, lobster and horseshoe crab in NYS waters began in summer 2022 and will continue in 2023;</p> <p>A HabCam survey was completed in summer 2022 and another will be completed in 2023; and</p> <p>The trawl survey may begin in summer 2023, after issuance of the NMFS Biological Opinion.</p>	<p>The survey start dates were added to the descriptions.</p>

Lessee Comment	Response
It should be clarified that pile driving for the Project may occur from May through December.	Text was updated in Section 3.10.3.3 and 3.10.5.5 to indicate pile driving will occur from May to December.
The "and complex bottom habitat areas" should also be included in the Alternative C-1 statement.	Text was updated in Section 3.10.9, Table 3.10-4.
"In situ disposal would be performed with low noise methods like deflagration of the MEC/UXO or cutting the MEC/UXO up to extract the explosive components." This statement seems to preclude the potential use of high order detonation. It should be clarified that high-order detonation could be used as method to dispose MEC/UXOs. The text also seems to imply that noise attenuation would be required for all activities, including Lift and Shift. BOEM should clarify which disposal methods would require noise attenuation.	Base analysis is included in Section 3.11.5.1.2.2. This section references Appendix G2 of the COP (Ordtek 2022), which has the full risk assessment and mitigation strategy decision guide. This guide is too extensive to include in the EIS, however, the information included in the analysis evaluates the anticipated worst-case scenario for detonation.
The text includes descriptions of several survey methodologies that are not proposed in the Project's Fisheries and Benthic Monitoring Plan (COP Appendix AA1). Sunrise Wind is not proposing to conduct eDNA sampling; structure associated fisheries surveys; clam, oceanographic, and pelagic fish surveys; or trap surveys. This section should be updated to reflect the Sunrise Wind Fisheries and Benthic Monitoring Plan.	Section 3.11.5.1 has been updated to reflect the Fisheries and Benthic Monitoring Plan and includes reference to the trawl survey. Reference to eDNA has been removed.
Sunrise Wind could not determine the source of the numbers and requests that they be updated to match the August 2022 COP. Note that the SRWEC is up to 104.6 mi. It is not correct to say that cable would be unburied; rather, up to 15 percent of the IAC (27 mi) and up to 5 percent of the SRWEC (5.2 mi) could require secondary cable protection (including jointing, but not including cable crossings).	This information was updated using the August 2022 COP information and the latest version of the Project Description.
There are no wetlands crossed by the onshore portion of the Project. This sentence should be modified to note the Project is adjacent to wetlands at the Carmans River but will not cross or impact any wetlands.	Thank you for the comment. The text was updated in Section 3.13.1.
Figure 3.6.1-3 may double count some vessels. It is possible that vessels go both more and less than 5 knots in the Lease Area. The text on page 3-	The comment is correct, and the text has been revised. The total unique vessels (per Figure 3.14-4 is 414) and some vessels may

Lessee Comment	Response
<p>392 above the figure states “Figure 3.6.1-3 indicates that approximately 34 percent of the 765 unique vessels identified operating in the Lease Area during the above-referenced period were actively fishing”. Because some vessels may go both more and less than 5 knots in the Lease Area, the number of unique vessels may be overestimated. BOEM should clarify how the data was used to produce the figure and numbers.</p>	<p>be counted more than once if they transit the Lease Area at different speeds or are engaged in both fishing and transiting. Text has been added to clarify this statement and histograms were updated.</p>
<p>Sunrise Wind respectfully disagrees with this statement. While anchored vessels make an area of sea unavailable to fishing (as do non-anchored vessels), they are not a navigational hazard. This should also be clarified on page 3-417.</p>	<p>The discussion of a navigation hazard (whether temporarily anchored or non-anchored) within the EIS is consistent with other BOEM EISs when discussing offshore activities and their impacts to commercial fisheries and for-hire recreational fishing.</p>
<p>Sunrise Wind suggests rewording this sentence to explain how a cultural resource could be affected/impacted.</p>	<p>Thank you for your comment.</p>
<p>This discussion should also note that geoarchaeological cores were taken as part of the geotechnical campaigns to further evaluate paleo landscape features for the potential to elucidate archaeological resources.</p>	<p>The information in the Finding of Adverse Effect (FoAE) has been updated to reflect avoidance based on additional information regarding ancient submerged landforms (ASLFs).</p>
<p>BOEM should clarify that one ancient submerged landform (ASLF) may potentially be disturbed from anchoring or jacked-up vessels utilized to conduct O&amp;M of the nearby WTG. Sunrise Wind is continuing to evaluate options to avoid or minimize disturbance to the referenced ASLF.</p>	<p>The information in the FoAE has been updated to reflect avoidance based on additional information regarding ASLFs.</p>
<p>With the addition of the 3 National Historical Landmarks in Newport, Rhode Island, these statements should be updated to 47 properties.</p>	<p>Appendix J, the FoAE, has been updated to reflect 47 adverse impacts within the Visual APE.</p>
<p>BOEM should clarify if these minimization and mitigation measures will be included in the MOA and/or ROD, instead of the COP approval.</p>	<p>Appendix J in the Memorandum of Agreement (MOA) has been updated to reflect avoidance, mitigation, and minimization measures.</p>
<p>Sunrise Wind recommends the FEIS mention that mid-tower aviation lights are dimmer than nacelle aviation lights.</p>	<p>As described in Section 3.5.7 of the COP, the lights would consist of two L-864 medium intensity red lights mounted on the nacelle and up to three L-810 low intensity red lights mounted on the midsection of the WTG. Therefore, Section 3.16.3.1 (previously Section 3.6.3.3 of the Draft EIS) has been revised to mention that</p>

Lessee Comment	Response
	mid-tower aviation lights are dimmer than nacelle aviation lights and not describe the two as the same.
The list of invited tribes should include the Mohegan Tribe of Indians of Connecticut, the Narragansett Indian Tribe, and the Delaware Tribe of Indians, along with the five non-Federally recognized tribes, to align with the List of Invited and Participating Consulting Parties in Table 1 of Attachment 2 to the MOA (DEIS Appendix J).	The three federally recognized Tribes have been added to the Final EIS, along with a reference to five non-federally recognized Tribes that could be considered environmental justice communities.
This statement contradicts the conclusions, which do not identify any major EJ impacts (see Table 3.6.4-5).	The Final EIS text has been updated to more accurately summarize the conclusions in the two areas noted. See Table 3.17-6.
This statement contradicts the conclusions, which do not identify any major EJ impacts (see Table 3.6.4-5).	The Final EIS text has been updated to more accurately summarize the conclusions in the two areas noted.
Alternatives C-1 and C-2 do not include changes to the turbine design capacity so this statement should be revised.	The text in Section 3.18.4 (previously Section 3.6.5.4 in the Draft EIS) has been revised to omit the reference to turbine design capacity.
The viewshed is not included in the GAA for Land Use and Coastal Infrastructure, as described in DEIS Appendix D, Figure D-15, and thus visual impacts should be removed from discussion in this section.	To accurately reflect the GAA for land use and coastal infrastructure, the text in Section 3.18.5 has been revised to only discuss impacts to resources within the GAA. Impacts to land use and coastal infrastructure would not stem from the offshore facilities but would potentially be impacted by the presence of structures of onshore facilities.
The applicant-proposed measure is actually "The construction of the Landfall and ICW HDD is expected to occur outside the summer tourist season, which is generally between Memorial Day and Labor Day. The construction schedule for the remaining onshore Facilities will be designed to minimize impacts to the local communities to the extent feasible."	The text in Section 3.18.5.1.1 (previously Section 3.6.5.5 in the Draft EIS) has been revised to reflect the APM proposed by Sunrise Wind.
Sunrise Wind will consult with NPS on planned construction activities to ensure noise impacts to the Otis Pike Wilderness area are minimized to	The text in Section 3.18.5.1.1 (previously Section 3.6.5.5 in the DEIS) has been revised to clarify this statement.

Lessee Comment	Response
<p>the extent practicable during construction of the Project. The recommendations associated with this NPS guide are largely applicable to the ongoing maintenance of landscaped and developed areas. It is anticipated by Sunrise Wind that, following construction, any necessary landscape or property maintenance operations within Project areas near the Otis Pike Wilderness area will be performed by the Suffolk County Department of Parks.</p>	
<p>A similar statement is made in the Traffic Section on page 3-632 regarding the May to September summer recreation and tourism season. The applicant-proposed measure is actually "The construction of the Landfall and ICW HDD is expected to occur outside the summer tourist season, which is generally between Memorial Day and Labor Day. The construction schedule for the remaining onshore Facilities will be designed to minimize impacts to the local communities to the extent feasible." These sections should be clarified to align with the measure.</p>	<p>The text in Section 3.18.5.1.1 (previously Section 3.6.5.5 in the DEIS) has been revised to reflect the APM proposed by Sunrise Wind.</p>
<p>Sunrise feels that the adverse impacts may be overstated considering the Project "... is not anticipated to change the overall land use and infrastructure within the analysis area" (see page 3-627 of the DEIS).</p>	<p>BOEM describes the range of potential impacts from IPFs in the EIS. BOEM defines moderate impacts to land use and coastal infrastructure as "Impacts would be detectable and broad-based, affecting a variety of land uses, but would be short-term and would not result in long-term change." The Proposed Action is not anticipated to result in long-term changes to land use and infrastructure within the analysis area, but BOEM has determined that there would be detectable and broad-based impacts to traffic and land disturbance from construction activities. It is anticipated that construction activities would create short-term disturbances to traffic in the highly congested area from lane closures, shifted traffic patterns, closed roadways, and closed parking lots, resulting in detectable impacts in the area. Additionally, the Proposed Action would result in short-</p>

Lessee Comment	Response
	term interruptions to recreation activities at both Smith Point County Park and the Fire Island National Seashore and in neighboring residential areas. The activities described would have both detectable and broad-based impacts to these areas, and therefore are described as moderate.
Sunrise Wind suggests including mention in Section 3.6.7.5.1.2.5 (and/or elsewhere that BOEM determines relevant) that four potential WTG positions within the uniform east-west/north-south grid (1 x 1 nm spacing) were removed due to proximity to existing cables and that Sunrise Wind has engaged with each of the identified telecommunication cable owners to discuss crossing and proximity agreements.	The text was revised to reflect this statement. Alternative C-3 mentions how WTG No. 154 was added to the layout.
Sunrise Wind is not aware of discussions related to the preclusion of NOAA Fisheries scientific surveys from cable routes, and the December 2022 NOAA Fisheries and BOEM Federal Survey Mitigation Strategy - Northeast U.S. Region does not identify cable routes as areas of concern.	The NOAA Technical Memorandum NMFS-NE-292, NOAA Fisheries and BOEM Federal Survey Mitigation Strategy - Northeast U.S. Region (Mitigation Strategy), issued in December 2022 outlines the goals, objectives, and specific actions of the Mitigation Strategy. The ultimate goal of the Mitigation Strategy is to develop and implement a Mitigation Program. BOEM states within the Mitigation Strategy that preclusion of NOAA Fisheries sampling platforms from wind development areas because of operational and safety limitations is an impact identified from offshore wind. BOEM references the Vineyard Wind 1 Offshore Wind Energy Project Final EIS, which directly states WTG foundations and cable routes as Project components that would exclude the area from potential sampling, and by impacting survey gear performance, efficiency, and availability.
These alternatives do not reduce the number of WTGs; therefore, these statements should be revised. Further, the following clarifications should be made for Alternative C-2: Due to the increased distance from the OCS-DC of the up to 12 relocated positions, additional IAC could be needed. However, this may vary,	The text was revised to reflect the correct descriptions of the alternatives.

Lessee Comment	Response
<p>depending on the final layout under the Alternative B Proposed Action. The up to 8 WTGs would only be removed from Priority Area 1, and the up to 12 relocated positions would be relocated from Priority Areas 1, 2, 3, and/or 4.</p>	
<p>Sunrise Wind has committed to maintaining public access to all facilities at Smith Point County Park and Smith Point Marina unless temporarily necessary for safety purposes (e.g., movement of equipment near the access point to the fishing pier). Sunrise Wind recommends clarifying the commitment to maintain public access to parking lots and the fishing pier.</p>	<p>BOEM has clarified the statement in the text to incorporate Sunrise Wind's commitment to maintaining public access to these areas unless temporarily necessary for safety purposes.</p>
<p>This reference should be updated to New York State's Certificate of Environmental Compatibility and Public Need (CECPN), issued on November 18, 2022.</p>	<p>The reference has been updated from New York State's Article VII Joint Proposal to New York State's Certificate of Environmental Compatibility and Public Need.</p>
<p>This suggests that there would be long-term impacts from construction of onshore facilities. The text should be clarified that the impacts from construction would be short-term.</p>	<p>Construction impacts would be temporary, only lasting the duration of construction activities. The text in the conclusion of Section 3.21.5.1 has been revised to state "The construction of onshore facilities would also result in short-term, minor to moderate adverse impacts to recreation and tourism as a result of increased visible infrastructure, traffic, lighting, land disturbance, and noise."</p>
<p>Sunrise Wind recommends this text be removed from the FEIS. BOEM has not identified specific tournaments or events which might be impacted. Without knowing which tournaments and events BOEM believes are impacted, it is impossible to know whether or not this mitigation is even relevant. Our outreach and research have shown that while there are a number of tournaments that regularly occur during projected construction activities, there are no tournaments which take place specifically within the Project area. Sunrise Wind believes that all tournaments, with the exception of tournaments which confine participants to certain areas (i.e., state waters for striped bass), allow</p>	<p>This text in Section 3.21.9.1 has been removed from the Final EIS. However, Section 3.21.9.1 includes measures that should be incorporated into the Preferred Alternative for Sunrise Wind to minimize, to the extent practicable, overlap with recreational fishing tournaments.</p>



Lessee Comment	Response
<p>participants to fish anywhere they please. Therefore, even if this mitigation were put in place, there is a good possibility tournament participants would not be fishing in the Project Area, as the presence or absence of target species would determine the area fished. To our knowledge, target species for known tournaments are present throughout the region. As for ‘important seasonal recreational fishing events’, Sunrise Wind is not aware of any on-the-water event, other than a tournament, which would fit this definition. Therefore, we do not believe ‘important seasonal recreational fishing events’ would be impacted by construction activities.</p>	
<p>This does not align with the key observation points identified in the Visual Impacts Assessment (COP Appendix Q1, Table 2.2-2 and Table 3.2-103) and does not include Nomans Island, which is closer than any other KOP. Sunrise Wind respectfully requests clarification and/or an explanation as to the differences in KOPs between the two documents.</p>	<p>BOEM has conducted an independent assessment of the potential impacts to scenic and visual resources based on the visual simulations and information provided by the Applicant in the COP. The methodology and results of this assessment are presented in Appendix I of this EIS. This analysis of scenic and visual resources considers methodologies provided in the Assessment of Seascape, Landscape, and Visual Impacts (SLVIA) of Offshore Wind Developments on the Outer Continental Shelf of the United States and the Guidelines for Landscape and Visual Impact Assessment. The BOEM SLVIA has two parts, including the seascape and landscape assessment (SLIA) and visual impact assessment (VIA). The level of impact described in Table 3.22-13 (previously Table 3.6.9-13 in the DRAFT EIS) summarizes the results of this methodology. Further description of how each impact level was determined is provided in Appendix I. Nomans Island is included in the 9th row of key observation points (KOPs) described as moderate in Table 3.22-13 of the EIS and in Table 1-4.1, Table I-4.2, Table I-7, and Table I-8 of Appendix I. The results of the impact rating are discussed in Appendix I, including the</p>

Lessee Comment	Response
	KOP characteristics and assessment parameters used.
EDR's cumulative visual simulations consider 1,055 structures. These discrepancies should be clarified.	BOEM has revised the text in Section 3.22.5 and in Appendix I, Section I.3.4 to clarify that the cumulative visual impacts were assessed using Environmental Design and Research (EDR)'s cumulative simulations, which consider 1,055 structures. The text has been clarified to reference that cumulative impacts to scenic and visual resources using these simulations consider 1,055 structures.
There is no discussion for navigation lighting. Sunrise Wind suggests such a discussion be added.	Section 3.22.5.2.2 has been revised to include discussion for navigation lighting.
Sunrise Wind suggests that the stated impact from presence of structures during O&M activities should be a range (i.e., negligible to major), as is stated for the Lighting IPF immediately below, as the impact to visual resources from the presence of structures would be dependent upon the distance from the SRWF, meteorological conditions, and angle of view.	The text in Section 3.22.5.2.2 describing impacts from the presence of structures has been revised to state "These changes would be long-term and would result in minor to major impacts to scenic and visual resources" to consider the range of potential impacts that would result from the Proposed Action.
There is no plan to conduct benthic habitat monitoring during construction. The Fisheries and Benthic Monitoring Plan (COP Appendix AA1) is consistent with other Orsted projects – South Fork Wind, Revolution Wind, and Ocean Wind 1 - none of which have benthic monitoring proposed for during construction (pre- and post-only).	Appendix H has been revised to reflect that benthic habitat monitoring is proposed for pre- and post-construction, not during construction activities.
These measures are relevant to both birds and bats and would reduce risk to both taxa.	BAT-02 was removed as an APM per one of Sunrise Wind's other comments.
No screening is required at the OnCS-DC, presuming that screening means a physical barrier, wall or other large obstruction for path noise control.	"Screening will be implemented at the OnCS-DC to the extent feasible, to reduce potential visibility and noise." was stated in the COP and therefore it was added to Table H-1 APM's. BOEM confirmed with Sunrise Wind through a Request for Information that this APM is still applicable.
Language regarding Sunrise Wind Export Cable can be removed, because no UXO/MEC detonations are expected to occur within the SRWEC.	Table H-1 of Appendix H has been revised.

Lessee Comment	Response
<p>Sunrise Wind’s Terrestrial and Marine Unanticipated Discovery Plans (UDP) (Attachments to COP Appendix Z) do not include the designation of a “Cultural Resources Compliance Manager”. The Terrestrial UDP includes the designation of an Archaeologist and the Marine UDP includes designation of a Qualified Marine Archaeologist (QMA). Sunrise Wind recommends this proposed measure align with the submitted UDPs to avoid confusion.</p>	<p>Appendix H has been revised.</p>
<p>Sunrise Wind’s Fisheries and Benthic Monitoring Plan (COP Appendix AA1) does not include the use of any fixed gear such as traps, pots, or gillnets. Thus, these measures should be revised or removed.</p>	<p>Appendix H has been revised.</p>
<p>While it is good that BOEM describes the option for the AMP and references the Thayer Mahan study, including the potential for nighttime piling, the statement regarding no anticipated Level A Harassment Takes is incorrect. Based on feedback from NMFS and the Updated Density and Take Estimates Memo (December 2022), small Level A Harassment Takes have been requested for fin, humpback, minke, sei whale, harbor porpoise, gray seal, and harbor seal (not coastal bottlenose dolphins). Thus, the text here should be revised.</p>	<p>Appendix H has been revised.</p>
<p>Sections III-A-2-I and III-A-2-v of the draft Memorandum of Agreement reference “3 to 5 borings” that would be collected, analyzed, and used for research. Additional borings would be required to meet the research/analysis objectives listed in these sections.</p>	<p>The Treatment Plan has been updated to reflect this in Appendix J of the Final EIS and incorporates previous comments on mitigation procedures.</p>
<p>This is an incorrect statement. The Temporary Landing Structure is a pile-supported trestle that avoids grounding at low tide.</p>	<p>Text in Section 3.9.4 has been revised to read "The pile-supported trestle would include direct short-term impacts of up to 1,500 ft<sup>2</sup> (139.4 m<sup>2</sup>) of SAV and/or benthic macroalgae due to direct ground disturbance and shading." Sections 3.9.4 and 3.9.5 have been revised to reflect new information, including the selection of a pile-supported trestle</p>

Lessee Comment	Response
	<p>for the transfer of the construction equipment and materials that would minimize the environmental impact to the extent practicable and provide the safest platform for the transfer of the construction equipment/materials and activity of the crew. The section will also include information from the draft EFH Assessment (December 2022) which was updated with October 2022 SAV surveys using underwater video and a GPS-enabled Seaviewer drop camera along east-west and north-south transect lines in the proposed temporary landing site, where no significant populations of eelgrass were found (see EFH Assessment for details).</p>
<p>Figure 2.1.2.1 should be updated to include the latest SRWEC, Landfall HDD, and Onshore Interconnection Cable routes.</p>	<p>Figure 2.1.2.1 (now Figure 2.1-1 in the Final EIS) has been updated with details from the August 2022 COP.</p>
<p>Sunrise Wind submitted its OCS air permit application to EPA in August 2022.</p>	<p>The text in Section 3.4.1 in the Final EIS was updated to indicate that the OCS Air Permit Application has been submitted.</p>
<p>The PDE has been refined to include only 1 HDD exit. Further, this description of seafloor disturbance from the HDD exit should not be included in the Onshore Activities and Facilities as it is an offshore activity and should be moved to Section 3.5.2.5.1.2. Thus, the impact to benthic habitat and fauna from seafloor disturbance from onshore facilities should be negligible, not minor, since there is no seafloor disturbance associated with the onshore facilities (i.e., the ICW HDD).</p>	<p>The Final EIS has been updated based on the Aug 2022 COP, which says that an HDD exit pit may be located offshore (Section 4-217 to 218). Construction of the SRWEC–NYS Landfall would be accomplished with HDD methodology. HDD installation could involve the excavation of an HDD exit pit nearshore within the surveyed corridor. Seafloor disturbance from HDD exit pit excavation will encompass a small area of similar available benthic habitat in the region.</p>
<p>This cable separation at the HDD is no longer in the PDE, and reference to it should be removed.</p>	<p>Removed statement in Section 3.7.5.2.2.</p>
<p>This should be revised to state: “AC magnetic and induced electric- field levels were calculated to be 4.6 mG and 0.09 millivolts per meter (mV/m), decreasing to 0.1 mG and less than 0.01 mV/m or less at a horizontal distance of ±10 ft (3 m) from the cables. Where the SRWEC cables are</p>	<p>Section 3.7.5.2.2 was updated.</p>

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<p>buried together to a depth of 3.3 ft (1 m), the change in DC magnetic field from that of Earth’s geomagnetic field would be +104 mG with induced electric fields (in an ocean current of 2 ft/sec [0.6 m/s]) of 0.37 mV/m.”</p>	
<p>This text should be updated to reflect the latest design parameters from the August 2022 COP, as well as the results of the October 2022 SAV survey</p>	<p>The Final EIS characterized the eelgrass as potentially occurring in the Project Area, and notes that it was found in 2018, but has not been confirmed in a more recent survey (2022). Sunrise Wind has described pre-Project surveys for the area that would confirm or deny its presence prior to surface disturbance.</p>
<p>This paragraph should be updated to reflect the latest design parameters from the August 2022 COP, as well as the results of the October 2022 SAV survey.</p>	<p>The Final EIS characterized the eelgrass as potentially occurring in the Project Area, and notes that it was found in 2018, but has not been confirmed in a more recent survey (2022). Sunrise Wind has described pre-Project surveys for the area that would confirm or deny its presence prior to surface disturbance.</p>
<p>This paragraph should be updated to reflect the latest design parameters from the August 2022 COP, as well as the results of the October 2022 SAV survey.</p>	<p>The text was updated to reflect changes in the COP and text was added about the October 2022 survey and findings.</p>
<p>Some of the values do not align with the COP and should be updated to match the text on p 4-318 of the August 2022 COP: “...were calculated to be 4.6 mG and 0.09 mV/m, decreasing to 0.1 mG and &lt;0.01 mV/m or less at a horizontal distance of ±10 ft (3 m) from the cables.”</p>	<p>This was updated in Section 3.11.5.2.2.</p>
<p>Some of the values and text do not align with the COP and should be updated to reflect the August 2022 COP and the information in Appendix J1 submitted in August 2022. A suggested revision is provided below (text added is underlined): “Exponent Engineering, P.C. (2018) modeled anticipated DC and AC EMF levels generated by the DC SRWEC and AC IAC, respectively. It estimated the maximum induced magnetic field levels deviation from earth's natural DC magnetic field from the buried SRWEC at the seabed and peak loading to be approximately 392 mG, decreasing to approximately 43 mG within</p>	<p>This was updated in Section 3.11.5.2.2.</p>

Lessee Comment	Response
<p>10 ft (3m) of the cable. ranging from 13.7 to 76.6 mG on the bed surface above the buried and exposed SRWEC cable and 9.1 to 65.3 mG above the IAC. The DC magnetic field strength from the SRWEC would effectively decrease to 0 mG within 25 ft (7.6 m) of each cable. By comparison, the earth’s natural magnetic field is more than five times the maximum potential EMF effect from the Project (Figure C-1, Appendix J; Sunrise Wind 2021j). The maximum AC magnetic field at peak loading at the seabed above the buried IAC was calculated to be 61 mG, decreasing to 0.3 mG within 10 feet of the cable.”</p>	
<p>Some of the values do not align with the COP and should be updated to reflect the August 2022 COP and the information in Appendix J1 submitted in August 2022. Note that the SRWEC is up to 104.6 mi. It is not correct to say that cable could be unburied; rather, up to 15 percent of the IAC (27 mi) and up to 5 percent of the SRWEC (5.2 mi) could require secondary cable protection (including jointing, but not including cable crossings).</p>	<p>Values were updated based on the most recent COP submission.</p>
<p>The text should be updated to reflect the latest design parameters for the Temporary Landing Structure from the August 2022 COP, specifically Section 3.3.10.2 on page 3-88 of the August 2022 COP, and Table 4.4.1-5 on page 4-164 of the August 2022 COP.</p>	<p>Thank you for the comments, updates were made.</p>
<p>It should be noted that these plans were submitted as appendices to the August 2022 COP.</p>	<p>Thank you for the comments.</p>
<p>Section 3.2 of the Cultural Resources Avoidance, Minimization, and Mitigation Measures (COP Appendix Z) indicates that Sunrise Wind anticipates three to five borings may be collected.</p>	<p>Thank you for the comments.</p>
<p>Table 3.6.3-7 has different numbers than those presented in the COP (Table 4.7.1-9) and should be corrected.</p>	<p>Table 3.16-7 of the Final EIS (Previously Draft EIS Table 3.6.3-7), is equivalent to Table 4.7.1-10 of the COP. COP Table 4.7.1-9 presents housing values by state within the expanded region of interest. Table 4.7.1-10 presented additional details by counties</p>

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	in the primary and expanded region of interest, and is the table utilized for the EIS.
Current-Dollar Gross Domestic Product by State for 2020 and 2021 Entity GDP (in millions of current dollars) was used in DEIS (table 3.6.3-8). The COP used 2018-2019 data (Table 4.7.1-2). The two tables should use the same data.	Table 3.16-8 in the Final EIS was updated with more recent, available data, which accounts for the difference between the numbers in the COP and the Draft EIS.
Figure 3.6.5-1 should be updated to include the Landfall HDD route and Temporary Landing Structure location depicted in the August 2022 COP.	Figure 3.18-1 (previously Figure 3.6.5-1 in the Draft EIS) has been updated to include the Landfall and HDD route and Temporary Landing Structure depicted in the most recent COP to reflect the most up to date proposal from Sunrise Wind.
Sunrise Wind suggests adding additional language to align with the PSMMP and ITA. E.g., "The PSO team will also have a PSO Project Manager who may work in the field or shore side for the duration of the mitigation activities to provide additional support to the Lead PSO and PSO team. The PSO Project Manager will also facilitate communication between PSOs and other shore side Project parties and provide administrative support to PSO in the field".	Although this level of detail is appropriate for the PSMMP, in terms of mitigation and monitoring, BOEM does not find it necessary to include this language in the requirements, although it may be approved in the final PSMMP following COP approval.
This measure in the ITA states "Activities with larger monitoring zones (>2 km) will use 25 x 150 mm..."	Table H-1 of Appendix H has been revised.
To align with the PSMMP document, Sunrise Wind suggests adding "vessel operators will monitor the Project's Situational Awareness System and as necessary, Whale Alert and the NARW RWSAS for the presence of NARWs once every 4-hour shift during Project-related activities".	Table H-1 of Appendix H has been revised.
Sunrise Wind suggests revising this language to match the most recently updated PSMMP to say: "All vessels will adhere to current NOAA vessel guidelines for approach distances and mandatory measures stipulated in regulations governing the approach to North Atlantic Right Whales and the Right Whale Speed Rule".	It is not necessary to revise this language to match the most recently updated PSMMP. Minimum separation distances and vessel speed requirements are separate requirements and are not combined. Minimum separation distances proposed by BOEM apply to all vessels regardless of whether or not the approach is intention or not. It is consistent with current

Lessee Comment	Response
	<p>approach regulations but removes interpretation that vessels must be approaching whales. BOEM has standardized this language and no change is required. Regarding seasonal management areas (SMAs), BOEM proposes to require all vessels follow the SMA speed restrictions regardless of vessel size. This change will not be made as it would restrict vessel speed restrictions to large vessel greater than or equal to 65 ft.</p>
<p>The PSMMP includes these extra details in the overall vessel strike avoidance policy section that should be added to the DEIS for both federal and state waters: "The mid-Atlantic SMAs specific to the Project Area include ports of New York/New Jersey and the entrance to the Delaware Bay in the vicinity of the Project Area. The same speed restriction will apply to vessels travelling within important feeding areas including Cape Cod Bay from January 1 – May 15, off of Race Point from March 1 – April 30, and in the Great South Channel from April 1 – July 31".</p>	<p>Table H-1 of Appendix H has been revised.</p>
<p>All references to '12-hours' are incorrect and should be revised to say '24-hours' to ensure consistency between the PSMMP (Attachment 6).</p>	<p>Table H-1 of Appendix H has been revised.</p>
<p>Sunrise Wind suggests adding "Deployment of PAM systems will be outside the perimeter of the shutdown zone" to align with the PSMMP language.</p>	<p>Table H-1 of Appendix H has been revised.</p>
<p>Sunrise Wind suggests mentioning that long-term monitoring will be applied during O&amp;M activities.</p>	<p>Language was added to this measure.</p>
<p>All mention of 'shutdown zones' in both the pre-start clearance and ramp-up section should be 'clearance zone' to align with both the ITA and PSMMP.</p>	<p>The pre-clearance and ramp-up section of Table H-1 of Appendix H has been revised.</p>
<p>It should be clarified that the PSMMP and ITA do not include monthly reporting to NMFS as is required within the DEIS reporting measures.</p>	<p>Table H-1 of Appendix H has been revised.</p>
<p>Both 'shutdown' and 'clearance zones' should be mentioned rather than</p>	<p>Table H-1 of Appendix H has been revised.</p>



Lessee Comment	Response
just 'shutdown zones'.	
All references to "shutdown zones" should be revised to say, "clearance zones".	Table H-1 of Appendix H has been revised.
It should be noted that the PSMMP does not include a ramp-up period for vibratory pile driving.	Table H-1 of Appendix H has been revised.
Sunrise Wind suggests adding additional language to align with the PSMMP for both federal and state waters: E.g., "The number and locations of recorders may be reduced to measurements conducted in open water locations due to the presence of land nearby. The distances at which acoustic recorders are placed from the landfall construction will be determined based on the modeled distances to the acoustic thresholds for vibratory pile driving (April 2022 PSMMP)".	Table H-1 of Appendix H has been revised.
There is an additional measure included within the HRG survey reporting section of the PSMMP that should be included here: "DMAs will be reported across all vessels".	Table H-1 of Appendix H has been revised.
The test should be clarified to say that two PSO-dedicated VFH radios are required.	Table H-1 of Appendix H has been revised.
This table should be updated to match the values included within the April 2022 PSMMP document. Within the updated table, both the pre-start clearance and Level B harassment zones are included.	Table H-1e in Table H-1 of Appendix H has been revised to include both the pre-start clearance and Level B harassment zones for the mitigation and monitoring zones associated with in-situ UXO/MEC detonation of binned charged weights, with a 10 dB noise attenuation system for the SRWF
The text should be revised to include additional measures included in the April 2022 PSMMP, including that during daytime observations, two PSOs on each vessel will monitor the pre-start clearance zones with the naked eye and reticle binoculars; and one PSO will periodically scan outside the pre-start clearance zones using the mounted big eye binoculars to document take should the device be detonated while marine mammals are in the area (but outside of the clearance zone).	Table H-1 of Appendix H has been revised.

Lessee Comment	Response
<p>The table should be revised to incorporate additional language in the PSMMP, including:                      "Collect data on approximate source levels, the directionality of the sound produced, and transmission loss in at least one direction." and                      "The distance at which acoustic recorders are placed from the UXO detonation will be determined based on the modelled distances to Level A and Level B thresholds for the applicable UXO size being detonated".</p>	<p>Table H-1 of Appendix H has been revised.</p>
<p>To align with the language in the ITA, Sunrise Wind suggests adding: "The start of the tow will be recorded when the net is fully deployed, and the winches are locked. The end of the tow will be recorded when the winches are engaged to retrieve the net back to the vessel. Therefore, the net will be present in the water for longer than 20 minutes, but will only be actively fishing for the 20-minute tow duration"</p>	<p>Table H-1 of Appendix H has been revised.</p>
<p>This measure is a bit contradictory to those required in the PSMMP:                      Base conditions: "All vessels 65 ft (20 m) or longer subject to the jurisdiction of the U.S. will comply with the 10-knot speed restriction when entering or departing a port or place subject to U.S. jurisdiction, and in any SMA during NARW migratory and calving periods from November 1 to April 30" Standard plan: "Between November 1st and April 30th: Vessels of all sizes will operate port to port (from ports in NJ, NY, MD, DE, and VA) at 10 knots or less between November 1 and April 30 except for vessels while transiting in Narragansett Bay or Long Island Sound which have not been demonstrated by best available science to provide consistent habitat for North Atlantic right whales. Vessels transiting from other ports outside those described will operate at 10 knots or less when within any active SMA or within the Wind Development Area (WDA), including the Sunrise Wind Farm and Sunrise Wind Export Cable. Year Round: Vessels of all sizes will operate at 10 knots or less in any Dynamic Management Areas (DMAs)"</p>	<p>Table H-1 of Appendix H has been revised.</p>

## O.6. Responses to Other Agency, Stakeholder, and Public Comments on the Draft EIS

### O.6.1. Proposed Action & Alternatives

**Table O-10. Responses to Comments on the Proposed Action and Alternatives**

Comment No.	Comment	Response
BOEM-2022-0071-0065-0015	Potential adverse impacts under the “No Action” alternative for several categories including moderate to major impacts for the fishing industry, minor to moderate impacts on finfish, invertebrates, and essential fish habitat, moderate impacts on marine mammals and sea turtles, and minor to moderate impacts for coastal habitats due to climate change. Minor to moderate impacts on air quality due to increased greenhouse gas emissions and air pollutants and minor to moderate impacts on water quality.	Thank you for your comment.
BOEM-2022-0071-0158-0006	Under No Action, compare to both scenarios, i.e., where all other wind projects are constructed and where no other projects are constructed.	Under the No Action Alternative, the SRWF would not be built, but the other wind farms that have already been approved or built would be considered the existing baseline. Considering cumulative impacts under the No Action Alternative, all proposed wind farms would be constructed in this scenario with the exception of the SRWF.
BOEM-2022-0071-0158-0010	The DEIS includes three alternatives, including two sub-alternatives for Alternative C. Alternative A is the no action alternative. Alternatives B and C use a uniform east-west and north-south facing grid of 1 x 1 nautical miles between wind turbines, as agreed to by multiple lease holders in the MA and MA-RI Wind Energy Areas.	As noted in Section 2.1.3.1 of the EIS, the specific 8 WTG positions that would be excluded from the identified priority areas are informed through the impact analyses described in Chapter 3. Section 3.5.2.6 and Figure 3.5.2-2 describe the analysis and indicate which 8 WTGs would

Comment No.	Comment	Response
	<p>Alternative B is the proposed action as described in the COP and includes up to 94 wind turbine generators with a nameplate capacity of 11 MW, one offshore DC substation, and one DC export cable. This would result in a 1,034 MW facility. Up to 103 placement positions for turbines and the DC substation are available; it would be helpful to understand which of the eight turbine positions are likely to be dropped if the entire 1,034 MW facility was constructed.</p>	<p>be considered for removal.</p>
<p>BOEM-2022-0071-0158-0011</p>	<p>The DEIS only considers 11 MW based on the contract limitations described on page 2-40. We support consideration of a reasonable range of MW capacities, including higher MW turbines as this can reduce the footprint of the project, while still generating the same amount of power.</p>	<p>A range of WTG sizes was considered during the early development of the EIS and it was determined that 11 MW was most suitable for this Project. For more details on this, please see Table 2.2-1.</p>
<p>BOEM-2022-0071-0158-0012</p>	<p>Alternative C includes two sub-alternatives to reduce impacts to habitat and cod spawning. NMFS identified four priority areas from which they suggested removing turbines, ranked based on documented cod spawning activity, presence of large boulders, and proximity to Cox Ledge. We understand that they are presented in rank order, with Area 1 being highest priority for removal and Area 4 lower priority. We recommend providing further details in the FEIS on how these four priority areas were defined. We also recommend clarification of how future identification of additional cod spawning locations based on ongoing research could alter the turbine configuration.</p>	<p>NMFS's methods for prioritization are described in Section 2.1.3 and Section 3.7.6. Under Alternative C-3, the most up-to-date data from Atlantic cod surveys were considered in identifying the locations for WTG removal. Since Alternative C-1 and C-2 are no longer feasible due to glauconite sands, Alternatives C-1 and C-2 were not revised to consider this new data.</p>

Comment No.	Comment	Response
BOEM-2022-0071-0158-0013	<p>The specific locations proposed for removal under Alternatives C1 and C2 are not included in the alternatives section of the DEIS, but are included in Section 3.5.2.6, which describes the expected impacts of Alternative C1 on benthic resources. These details should also be included in the alternatives section. Alternatives C1 and C2 do not propose removing all turbines within the priority areas recommended by NMFS. The FEIS should explain why full removal of the NMFS highest priority areas wasn't considered.</p>	<p>Sections 3.5.2.6 and 3.5.2.7 present the analysis and results as requested by the NMFS. As stated in the EIS, NMFS priority areas, the highest boulder densities, and the maintenance of contiguous habitats informed how these alternative choices were developed.</p>
BOEM-2022-0071-0158-0014	<p>Alternative C1 would remove 8 turbine positions that are in or adjacent to known or likely areas of contiguous complex benthic habitat or cod spawning areas. In addition to these 8 turbine positions (87-94), we also recommend removing the positions labeled 95-96 to create a continuous area of complex habitat protected from development. Alternative C2 would identify additional turbine positions (beyond those removed in C1) that are in or adjacent to known or likely areas of Atlantic cod spawning and relocate these turbines to the eastern part of the lease area which was surveyed during 2022. Alternative C2 is more protective of habitat and cod spawning than C1, assuming that habitats in the eastern part of the lease, which had been less well studied at the time of COP development, are less complex and less likely to support cod spawning activity. The relationship between sub-options C-2a through C-2d (Figures 3.5.2-3 through 3.5.2-6) and priority areas should be explained, including why NMFS priority 1 area turbines weren't the first to be excluded under these</p>	<p>Thank you for your comment. Alternative C-1 and C-2 are no longer feasible due to glauconite sands. We appreciate your comments, but since these alternatives are no longer feasible, these changes in the wind turbine generator configuration will not be considered.</p>

Comment No.	Comment	Response
	alternatives	
BOEM-2022-0071-0158-0015	<p>Alternative C2 is described as being feasible subject to geological study and meeting the purpose and need. The developer should complete any necessary geological surveys prior to FEIS development so BOEM does not analyze an infeasible alternative from a geotechnical standpoint. It is not clear if the entire project area has been surveyed, the timing of geological sampling relative to the COP, and if there will be the same geotechnical challenges that arose in Empire Wind 1’s project area, where some turbine locations and associated alternatives were determined to be infeasible following release of the COP. The COP appears to have been revised several times (August 2021, October 2021, and August 2022) and the timing of sampling and the geological sampling area are not well defined. This concern highlights the challenges with the environmental review process for offshore wind energy projects to date. Geophysical survey work (e.g., a full site assessment) should be completed before releasing a COP and before developing the DEIS in order to inform the alternatives and analyses. This can help ensure that all alternatives considered in the DEIS are technologically feasible.</p>	<p>Thank you for your comment. Prior to the Draft EIS development, the entire Lease Area was surveyed but not in full detail on the eastern side. BOEM requested the eastern side to be fully surveyed prior to Final EIS development to provide further details to analyze Alternative C-1 and C-2. During this timeframe, more geological sampling occurred within the Lease Area, revealing that some areas were not feasible for development due to glauconite sands. This prompted the development of Alternative C-3 since Alternative C-1 and C-2 are no longer technically feasible. BOEM is developing further guidelines for developers to avoid these issues in the future.</p>
BOEM-2022-0071-0158-0016	<p>For each alternative (B, C1, and C2), we recommend providing figures of the lease area, turbine placement positions, and cable routes relative to backscatter and boulder locations. Figure 3.5.2-1 only includes boulder densities within the lease area and backscatter data would be helpful to further delineate complex hard</p>	<p>Additional figures displaying backscatter and Atlantic cod data have been included in the Final EIS as part of the Alternative C-3 analysis.</p>

Comment No.	Comment	Response
	<p>bottom substrates. Furthermore, layering cod spawning aggregation data on such a figure would also be helpful in identifying certain areas of the lease to avoid or mitigation measures to reduce any impact (e.g., time of year restrictions for cod spawning).</p>	
<p>BOEM-2022-0071-0158-0017</p>	<p>The proposed action includes an AC to DC converter station with an associated cooling system. This is noteworthy from a fisheries perspective because the cooling system will entrain larvae, all of which are expected to experience mortality due to the high temperature effluent. Given this level of expected impact, we recommend including a rationale for the cooling station's location in the proposed action, which could also have an impact on heat dissolution. We also recommend evaluating whether a different cooling station location would result in fewer larval impacts.</p>	<p>Table 2.2-1 in the Draft EIS provides a discussion on the dismissed alternative that considered relocation of the OCS-DC.</p>
<p>BOEM-2022-0071-0158-0018</p>	<p>We support Alternative C2 with a focus on developing the easternmost portion of the lease in order to protect complex habitat and known cod spawning locations. As previously stated, further information is needed to fully understand which placement positions would be removed for each of these subalternatives individually and when combined. We recommend using NMFS priority areas to determine which turbine positions should be excluded from development to reduce the potential for negative impacts to fisheries and habitats.</p>	<p>The rationale for excluding certain WTG positions from development is provided in Sections 3.5.2.6 and 3.5.2.7 of the Final EIS.</p>
<p>BOEM-2022-0071-0158-0019</p>	<p>The DEIS and FEIS documents for this and other projects should evaluate a range of turbine MW sizes that are realistic for development. There are tradeoffs inherent in the selection of larger or smaller turbines. For</p>	<p>A range of WTG sizes was initially considered as an alternative but was ultimately dismissed. Please see Table 2.2-1 why this alternative was not analyzed in detail.</p>

Comment No.	Comment	Response
	<p>example, larger turbines will require larger impact hammers during installation, but the use of larger turbines will allow for fewer locations overall. Considering only 11 MW turbines in this DEIS precludes evaluation of tradeoffs.</p>	
<p>BOEM-2022-0071-0158-0020</p>	<p>Overall, the evidence and information provided should be consistent with impact determinations. For every analysis in the FEIS, we recommend including detailed information on the methods, caveats, and assumptions in order for stakeholders to understand and evaluate potential impacts and resulting avoidance, minimization, mitigation, and compensation measures. These comments apply to fisheries impacts as well as other impact analyses in the FEIS.</p>	<p>Appendix H, <i>Mitigation and Monitoring</i>, identifies all specific mitigation proposed for the Project, the anticipated enforcing agency for each proposed measure, and reporting requirements, where applicable. There is a discussion of the mitigation measures and how they would impact the preferred alternative. The Final EIS also presents a complete description and analysis of impacts from ongoing activities and trends (i.e., No Action Alternative) and impacts from the Proposed Action and alternatives.</p>
<p>BOEM-2022-0071-0198-0003</p>	<p>In identifying potential port facilities that could support construction or O&amp;M for the project, Sunrise Wind failed to recognize New Bedford's second terminal dedicated to offshore wind. The New Bedford Foss Marine Terminal is a private venture that will add another base of operations and terminal logistics facility to support offshore wind projects off Massachusetts and the northeastern coast seaboard. The 30-acre site will undergo redevelopment this year and will provide storage and laydown yards for equipment and materials, berth facilities for tug and barge operations, and host crew transfer vessel (CTV) and service operation vessel (SOV) support services. It will create new office space for project teams and a marine coordination center for technicians involved in offshore wind projects.</p>	<p>At this time, Sunrise Wind has no plans to use the New Bedford Foss Marine Terminal as a port. The Port of New York-New Jersey, NY, New Bedford Marine Commerce Terminal, MA, Sparrows Point, MD, Paulsboro Marine Terminal, and/or Port of Norfolk, VA are considered back up and/or support facilities in the COP PDE. The use of these ports will depend upon contract signing and vessel availability, home port locations of vessels, supply chain logistics, emergency or storm refuge, and/or additional unforeseen circumstances.</p>



Comment No.	Comment	Response
	<p>We encourage BOEM and Sunrise Wind to extensively review both this site, as well as the New Bedford Marine Commerce Terminal and other current and future facilities within the Port of New Bedford, for a location for construction, assembly and fabrication, as well as future O&amp;M activities. Both sites are well positioned geographically and provide extensive shoreside support.</p>	
<p>BOEM-2022-0071-0232-0004</p>	<p>With respect to the DEIS’s discussion of alternatives, BOEM must examine alternatives that also help meet NY’s clean energy goals. Without meaningful alternatives, the document becomes meaningless and capricious. The comparison should include an alternative that avoids complex hard-bottom habitat and other renewable energy options such as small-scale nuclear and solar. Without such alternatives, the DEIS does not offer a meaningful analysis.</p>	<p>Thank you for your comment. Alternatives C-1, C-2, and C-3 identified complex hard bottom habitat for avoidance of development. Alternatives that analyze small-scale nuclear and solar is not within the scope of this Project and would not be appropriate to analyze within this EIS.</p>
<p>BOEM-2022-0071-0232-0007</p>	<p>The DEIS fails to examine the direct, indirect, and cumulative impacts of Sunrise Wind on individual species in light of the species’ particular conservation statuses. Without this species-by-species analysis, the DEIS cannot meaningfully consider the effects of Sunrise Wind on the marine environment. BOEM must go back and actually examine the impacts of the wind farm on a species-by-species basis using the most up-to-date models and telemetry data. BOEM must also be transparent about uncertainties and gaps in the data and adopt a precautionary approach where endangered and protected species are at risk.</p>	<p>Analysis of species that may be impacted by the Project are summarized in Chapter 3. Data used is most current and updated. Additionally, all federally and state-listed species are analyzed in detail during their respective consultation processes under the appropriate federal or state regulations.</p>

Comment No.	Comment	Response
BOEM-2022-0071-0232-0009	<p>BOEM minimizes the impacts of the project on marine life, birds, and bats by insisting that other habitats are available elsewhere; however, this does not account for the fact that many species affected by Sunrise Wind exhibit high site fidelity and as a result, may be less likely to simply move elsewhere. It also fails to account for the cumulative impact of the other projects in the lease area and how interactions between stressors might preclude the species from utilizing the “replacement” habitat. BOEM must fully examine the impacts on wildlife that will occur from the loss of habitat, particularly on those species that exhibit high site fidelity, exhibit the location and availability of alternate habitats, and offer concrete evidence to support its assumptions that the impacts will be “minor” due to the existence of other suitable habitats.</p>	<p>Site fidelity was considered in Chapter 3 and is included in the cumulative analysis. For birds and bats, the areas of potential displacement are minimized through the use of easements and rights-of-ways, areas already subject to disturbance. Newly disturbed upland and coastal areas are very small. We are unaware of any bird or bat species that exhibit such specific site fidelity that would compromise their ability to return to an area within a couple hundred feet of a potentially disturbed or removed habitat. Potential impacts on marine mammals and sea turtles are considered in Section 3.11 and Section 3.12, respectively.</p>
BOEM-2022-0071-0232-0027	<p>The Executive order 14008 dictates the need for the projects to maintain biodiversity. The World Health Organization affirms that biodiversity loss poses a greater risk to human health than climate change alone (Patil, 2017). The mortality risk to endangered species, the introduction of invasive organisms, and the degradation of the coastal habitat from the project will all contribute to a reduction of biodiversity. Wind energy has documented risks to biodiversity (Voigt, 2019). Given the health consequences of biodiversity loss, expansive wind farm installations could violate the internationally recognized Human Right to Health (UN, 2000) as well as the mandate from the executive order. The US government has an obligation under</p>	<p>Thank you for your comment. Risks to biodiversity are analyzed in the Chapter 3 analysis. Biodiversity is preserved by maintaining the integrity of each individual species. No sea turtle or marine mammal species are anticipated to be at risk of extinction or major impacts from the proposed action. Under Alternative C-3, by siting the WTGs away from the more diverse complex habitats, the SRWF would minimize impacts to these more diverse communities. The Climate Resiliency Executive Order (EO) referenced falls under climate change. Biodiversity/climate change are addressed under Coastal Habitats, along with the anticipated preservation of biodiversity via reducing the use of oil and therefore reducing the impacts of climate change.</p>

Comment No.	Comment	Response
	<p>international human rights law to protect biodiversity as an important factor in human health (Hamley, 2022). The BOEM DEIS does not incorporate the latest scientific findings from the North Sea on biodiversity loss, nor does it address the relationship between biodiversity loss and human health. BOEM cannot afford to ignore biodiversity loss in evaluating the cost-benefit analysis of offshore wind farm development.</p>	<p>This is addressed in Sections 3.9.1, 3.9.2, 3.9.3, and 3.9.5.</p>
<p>BOEM-2022-0071-0242-0014</p>	<p>Critical to a proper cumulative impact analysis is its scope. It is important that the reasonably foreseeable impacts BOEM has chosen to assess be examined on the proper temporal and spatial scope to ensure that cumulative effects are fully evaluated. In addition to details provided in the sections below, we urge BOEM to ensure that, in evaluating impacts to species, the agency considers potential changes in range and seasonal use due to various anticipated levels of warming and climate change.</p>	<p>The EIS addresses changes in current species range due to climate change based on available literature. In Section 3.7.3 and 3.7.5 (Benthic Resources) changes in current species range due to climate change effects was discussed in reference to Pinsky et al. (2020). The potential impacts of range and seasonal use shifts for marine mammals, sea turtles, birds, and bats were also considered within their respective sections.</p>
<p>BOEM-2022-0071-0248-0012</p>	<p>Both DEISs should explicitly include alternatives for analysis that serve to mitigate the project's impacts to fishing, including the specific requests above, those raised during scoping and in previous comment letters, and those listed on RODA's website. The Sunrise DEIS includes alternatives intended to minimize impacts to fisheries habitats. The CVOW DEIS includes alternatives designed to accommodate fish haven and navigation as well as one accommodating sand ridge habitat. While inclusion of these alternatives is appreciated, and we agree minimizing impacts to important habitat features is important; these do very little to protect the</p>	<p>BOEM's regulations require BOEM to analyze Sunrise Wind's proposal to build a commercial-scale wind energy facility on the Renewable Energy Lease Number OCS-A 0487. The purpose and need in the EIS reflect the requirement per those regulations, whereas BOEM's purpose as stated in Section 1.2 is to determine whether to approve, approve with modifications or disapprove Sunrise Wind's COP, is needed to fulfill BOEM's duties under the lease. As part of the NEPA process, alternatives were considered and screened if it was outside the jurisdiction of the lead agency. Mitigation and monitoring measures identified for consideration in</p>

Comment No.	Comment	Response
	<p>dependent recreational and commercial fishing communities. We recommend other habitat features important to fisheries in the lease area be afforded similar protection as well. This would ensure that disruptions to our nation’s food security is minimized and reduce the potential for negative impacts to shoreside business dependent upon the seafood harvested in the lease area. The nation’s seafood supply is dependent upon our harvesters and shoreside support businesses. Each of these depends on the other. If harvesters are unable to keep product coming across the docks, the buyers and processors are directly impacted. If a processor is forced to close their doors, the harvesters have no place to sell their catch, and they will likely lose access to shoreside infrastructure necessary for their operations (ice houses, offloading equipment, etc). When analyzing potential impacts to commercial fishing under any of the alternatives proposed, the analysis necessarily needs to consider potential impacts to, and mitigation measures for, those shoreside businesses as well. BOEM’s practice to date has been to incorporate mitigation measures under consideration as appendices or Record of Decision conditions rather than analyzing them fully as alternatives.</p>	<p>the EIS are summarized at the end of each resource area. Appendix H Mitigation and Monitoring further describes the APMs committed to by the developer in the COP, additional mitigation and monitoring measures being considered by BOEM, and mitigation measures required through consultation with cooperating agencies.</p>
BOEM-2022-0071-0249-0036	<p>Moreover, for Section 110(f) purposes, it is not appropriate for BOEM to default always to Sunrise Wind’s preferred alternative in the Draft Environmental Impact Statement, ruling out all other minimization alternatives—as well as other avoidance and minimization measures—because they do not fit with</p>	<p>Thank you for your comment. No preferred alternative has been chosen in the Final EIS and BOEM will not default to Sunrise Wind’s Preferred Alternative. BOEM is continuing to consult with the National Park Service (NPS) and other consulting parties on the mitigation measures for adversely affected properties and</p>

Comment No.	Comment	Response
	<p>Sunrise Wind’s self-serving purpose and need. Likewise, BOEM’s apparent decision that Sunrise Wind will not significantly affect our clients’ NHLs’ historic integrity fails to consider their inseparable connection to the Atlantic Ocean or the special sensitivity that those who value NHLs have to integrity losses. Section 110(f) demands a heightened level of scrutiny that BOEM has not yet met.</p>	<p>continues to fulfill the requirements of Section 110(f).</p>

## O.6.2. Air Quality

**Table O-11. Responses to Comments on Air Quality**

Comment No.	Comment	Response
BOEM-2022-0071-0232-0012	The DEIS indicates that significant amounts of SF6 will be housed in the turbines and substations and that SF6 leaks during operations. Given that every molecule of SF6 contributes 23,500 x more than CO2 to greenhouse warming, and Scotland’s disastrous leak of SF6 (Mavrokefaledis, 2022), we should not tolerate the risk of contributing to GHG emissions in our effort to mitigate climate change. BOEM should insist that the developer eliminate all components with SF6 (turbines and substations).	Thank you for the comment. There will be no SF6 used with the turbines. Sunrise Wind has evaluated the feasibility of SF6-free designs for the OCS-DC and those options are currently not technically feasible. The current APMs for the Project include the use of completely sealed switchgears equipped with integral low-pressure detectors to detect a leak, in the unlikely event one were to occur. The switchgears have a manufacturer-certified leak rate of less than 0.5 percent per year, which is in compliance with EPA and Massachusetts guidelines.
BOEM-2022-0071-0205-0022	The FEIS should be sure to detail all information related to air and water quality associated with manufacturing, port activities, construction, and ongoing operations and maintenance of the Project.	Thank you for the comment. Information related to air and water quality associated with port activities, construction, and O&M is provided in the Final EIS. Information related to manufacturing is not available.

### O.6.3. Bats

**Table O-12. Responses to Comments on Bats**

Comment No.	Comment	Response
BOEM-2022-0071-0232-0028	Wind turbines kill more bats than previously recognized (Voigt, 2022), particularly during the autumn migratory season. One bat species native to Rhode Island, the northern long-eared bat, was recently listed as endangered and thus, is now protected under the Endangered Species Act. Moreover, bats control insect populations. One brown bat can eat 1000 mosquitos per night. Decreasing bat numbers will allow mosquito populations to rise, thereby increasing the prevalence of mosquito-borne diseases, including Zika (Elrefaey, 2021), West Nile (Ferraguti, 2021), and Eastern Equine Encephalitis (Armstrong, 2022) viruses. At a time when nations have pledged to decrease pesticides (Einhorn, 2022), we cannot allow wind farm developments to reduce bat populations. The BOEM does not adequately incorporate the latest scientific findings that recognize the true bat mortality associated with wind farms, nor does it address the public health consequences of decreasing bat populations, the spread of mosquito-borne illnesses, and the subsequent rise in insecticide use this will promote.	The most recent literature and data were used to prepare a separate Biological Assessment for USFWS Section 7 consultation under the ESA for listed bat species. Based on a review of all relevant literature, our conclusion remains the same.
BOEM-2022-0071-0242-0010	Consult with the U.S. Fish and Wildlife Service about potential offshore collision impacts to the northern long-eared bat, which was recently reclassified as endangered;	Thank you for your comment. This information is contained within the USFWS Biological Assessment in consultation with the USFWS.
BOEM-2022-0071-0242-0054	Little data exist on bats' use of the offshore environment and their interactions with offshore WTGs, although research at land-based wind facilities reveals that bat fatalities are common, with the potential for cumulative impacts to cause population-level declines. Because all bats in the Project Area have documented collisions with land-based wind energy facilities and significant uncertainties exist around bats' use of	Acoustic data has been collected in the region and for offshore wind projects. Acoustic data indicates low bat usage offshore. Mitigation and monitoring measures will be implemented for this Project, and BOEM recently completed a

Comment No.	Comment	Response
	<p>the offshore environment, BOEM should not interpret a lack of data as a lack of impacts and instead work with Sunrise Wind, the RWSC, and other developers to implement monitoring regimes to enable better understanding of bat impacts from offshore wind development.</p>	<p>Section 7 consultation with USFWS for ESA-listed and proposed bird and bat species and concurred with BOEM's determination that the Proposed Action is not likely to adversely affect northern long-eared bats or tricolored bats but did not evaluate the potential for effects to little brown bats. A description of the presence of northern long-eared bats, little brown bats, and tricolor bats has been added to the description of the affected environment section of the bats section.</p>
<p>BOEM-2022-0071-0242-0055</p>	<p>As discussed above, assessing cumulative effects is essential to understanding impacts and this is particularly important for bats, where the best available scientific information indicates that cumulative impacts from land-based wind energy have the potential to cause significant population-level declines. Sunrise Wind's DEIS states that the Proposed Action and other reasonably foreseeable projects will result in negligible or minor adverse cumulative impacts to bats but insufficient research is provided to support this claim, especially given the issues discussed below with the project-level impact analysis for bats.</p> <p>Of particular concern for the accuracy of BOEM's cumulative impact analysis for bats is the geographic analysis area. BOEM defined the geographic analysis area as 100 mi offshore and 0.5 mi inland, the smallest geographic analysis area used for any U.S. offshore wind project thus far. This is at odds with the geographic analysis area used for bats for Vineyard Wind 1, where the area extended 100 mi inland. BOEM presents no research in the DEIS to support the assumption that bats found offshore exclusively use very near-coast habitat on land (i.e.,</p>	<p>Geographic analysis is based on the geographic extent of potential Project impacts, either direct or interdependent or interrelated activities/effects, rather than the entire range of species that overlap with Project areas. The inclusion of all areas where individuals who may cross Project areas would quickly result in impractically large areas to incorporate into the geographic analysis (e.g., monarch butterflies, humpback whales, blue whale, and roseate terns). The analysis of potential impacts to bat species will be updated with additional information that was included in the Biological Assessment developed for ESA consultation with USFWS for listed bat species.</p>



Comment No.	Comment	Response
	<p>half a mile or less from the coasts) to support this limited geographic scope.</p> <p>A survey of available research on bat migration does not support BOEM’s rationale for their limited inland geographic analysis area in Sunrise Wind’s DEIS. Although the migratory movements of bats, especially migratory tree bats, are poorly understood, many species of bats—both long-distance migrants like migratory tree bats but also cave bats—are capable of flights in excess of 100 km (62 mi), indicating that bats found offshore in wind development areas could also be found significant distances inland. Research from Canada found that 20 percent of little brown bat movements exceeded 500 km (311 mi), which is further supported by data from tracked little brown bats, which shows individuals using both coastal areas and making long-distance flights to locations significantly further inland than 0.5 mi. Hoary bats, which are capable of long distance flights over water, have been recorded traveling over 1,000 km (621 mi) and are thought capable of migrations in excess of 2,000 km (1243 mi). Furthermore, in addition to little brown bats, data in Motus tracks movements of individual silver-haired bats, eastern red bats, hoary bats, eastern small-footed bats, and Indiana bats from coastal areas on the east coast to areas in excess of 100 mi inland. These movements do not support a geographic analysis area that extends only 0.5 mi inland but rather suggest that bats exposed to offshore wind energy projects could be found far inland (and therefore exposed to land-based wind energy facilities) and that a geographic analysis area that extends 100 mi inland would be more appropriate.</p> <p>BOEM should conduct a thorough review of the literature on bat migration and radio- and GPS-tagged bats and select a boundary that</p>	

Comment No.	Comment	Response
	<p>better reflects the potential habitat use of exposed bats. This revised boundary will likely require an updated analysis to reflect that bats exposed to offshore wind projects could not only be exposed to multiple offshore wind facilities but also be exposed to land-based wind energy projects.</p>	
<p>BOEM-2022-0071-0242-0056</p>	<p>The DEIS and COP point to low bat detections (despite low survey effort) in the offshore environment and the offshore Project Area to support a finding of negligible impacts on bats. The data analyzed to support this are acoustic data collected in the offshore environment in the absence of offshore wind turbine structures. These data are unlikely to reflect bats’ use of the offshore Project Area once turbines are constructed due to bats’ attraction to wind turbines. Although the DEIS and COP seem to acknowledge this—noting that “visible structures on a previously flat, unusable landscape may provide potential roosting opportunities” and that “[o]ffshore structures may attract bats or serve as concentration points”—the analyses do not seem to account for the potential increased collision risk associated with attraction. Given the addition of structures post-construction and bats’ known attraction to structures, including wind turbines, basing post-construction impact analyses on preconstruction acoustic data is inappropriate.</p> <p>At land-based wind facilities, pre-construction bat activity does not correlate with post-construction fatalities, likely due to bats’ attraction to turbine structures. Furthermore, recent research at buoys, vessels, and the two Dominion wind turbines off the Virginia coast found considerable differences in bat activity in the presence of turbines as compared to open water. This once again underscores that BOEM should not draw conclusions about Sunrise Wind’s impacts on bats based on sparse offshore acoustic data collected over open water.</p>	<p>Thank you for your comment. BOEM has engaged with USFWS for a Section 7 consultation regarding listed and proposed bird and bat species.</p>

Comment No.	Comment	Response
	<p>Although the COP and DEIS acknowledge bats’ attractions to wind turbines, this attraction is not clearly factored into the impact analyses as to how it could increase collision risk. In fact, the COP and DEIS explicitly state that the wide spacing of the turbines in the offshore environment may allow bats “to avoid operating WTGs and minimize risk of potential collision.” This assertion is starkly at odds with the best available scientific information on bats and wind turbines which indicates that bats will change course not to avoid, but to approach wind turbines. BOEM must consider the potential that bats could be attracted to offshore wind turbines—which would dramatically increase collision risk—and update the impact assessment accordingly.</p>	
<p>BOEM-2022-0071-0242-0057</p>	<p>A lack of data on offshore movements of cave-hibernating bats, such as Myotis bats, including the newly endangered northern long-eared bat, does not imply a lack of impacts. Despite acknowledging that there is uncertainty around movements and behaviors of bats offshore, the COP and DEIS nevertheless conclude that cave-hibernating Myotis bats, including the now-endangered northern long-eared bat, “do not typically occur on the OCS” and that their offshore movements are “rare[.]” However, cave-hibernating bats may be found offshore more frequently and at greater distance than the assessments in the COP and DEIS indicate. Acoustic survey efforts in the Mid-Atlantic identified Myotis calls at 63 percent of sites surveyed, and Myotis species were present at 89 percent of sites surveyed across the Gulf of Maine, Mid-Atlantic, and Great Lakes.</p>	<p>Additional analysis and references from the Section 7 consultation with USFWS were added to Section 3.6.5.3.</p>
<p>BOEM-2022-0071-0242-0058</p>	<p>Although the DEIS and COP both state that the federally endangered Indiana bat is not known to occur in the area, a tagged Indiana bat was detected just north of the Project Area, as discussed in Section III.I.3 of our scoping comments. We refer BOEM back to those scoping comments.</p>	<p>A singular detection is generally considered extralimital until there is additional corroborating information. Upon further research following this comment, no other information indicated detections of Indiana bats in the action area.</p>

Comment No.	Comment	Response
<p>BOEM-2022-0071-0242-0059</p>	<p>Although endangered northern long-eared bats are present near the cable landing, on Block Island, on Long Island (including Fire Island National Seashore), and on Martha’s Vineyard, collision impacts are largely dismissed as low risk. This conclusion relies on a lack of acoustic detections offshore, coupled with a small study in which five tracked northern long-eared bats did not make offshore movements.</p> <p>While limited offshore movement data exist for bats, the presence of northern long-eared bats on both Martha's Vineyard and Nantucket indicates that this species can cross open water and the species has been tracked making long distance flights over water in the Gulf of Maine. Moreover, as noted within the COP and DEIS, a northern long-eared bat was acoustically detected near Sunrise Wind’s Project Area, 34 km offshore around South Fork Wind Farm. Furthermore, the lack of confirmed acoustic calls from northern long-eared bats in some offshore wind surveys does not necessarily support that northern long-eared bats would not be found in the offshore Project Area. There were 157 bat calls detected in the surveys that were not identified to species and therefore could have been produced by northern long-eared bats.</p> <p>Given the potential for the species to use the offshore environment, the detection of a northern long-eared bat during South Fork surveys, and the lack of survey efforts to provide evidence of absence, BOEM should not consider exposure and risk to northern long-eared bats and other cave bats to be negligible. Instead, BOEM should consult with the U.S. Fish and Wildlife Service on potential impacts and require Sunrise Wind to conduct or support monitoring to better understand the potential presence of and collision risk to northern long-eared bats in the offshore Project Area.</p>	<p>BOEM has engaged with USFWS for a Section 7 consultation regarding listed and proposed bird and bat species. The consultation used the best available data, and that analysis was carried forward into the Final EIS.</p>

Comment No.	Comment	Response
BOEM-2022-0071-0242-0060	<p>Because of the significant data gaps that preclude meaningful impact analyses for bats and offshore wind development, robust monitoring, especially post-construction monitoring, will be critical to better understanding potential impacts to bats from Sunrise Wind’s operations. As new technologies become available for monitoring impacts at offshore wind facilities, such as strike detection technology, BOEM should require Sunrise Wind to commit to deploying these and, if monitoring reveals that impacts to bats are non-negligible, BOEM should require Sunrise Wind to employ minimization strategies and deterrent technologies.</p>	<p>The Avian and Bat Post-Construction Monitoring Framework is included as an attachment to COP Appendix P2 (Goodale et al. 2022) and is publicly available on BOEM’s website. Additional mitigation and monitoring measures may arise from consultations and coordination with federal and state resource agencies. These additional monitoring requirements would be considered by decision-makers and incorporated into the terms and conditions for COP approval.</p>

**O.6.4. Benthic Resources**

**Table O-13. Responses to Comments on Benthic Resources**

Comment No.	Comment	Response
BOEM-2022-0071-0002	<p>Ecological design elements should be incorporated into the offshore wind infrastructure, specifically for scour and cable protection where benthic habitat could be maximized. Using nature-based design elements significantly increases species settlement, richness, and abundance. Nature-based design elements allow the structure to actively provide carbon sequestration, decrease the magnitude and frequency of maintenance leading to increased structural lifespan. Using ecological concrete as a mitigation measure and design alternative supports compliance with strict environmental regulations. The term "ecological concrete" is an alternative to traditional concrete that enhances or encourages the growth of flora or fauna when placed in a marine environment. Ecological concrete may include recycled materials, such as recycled or reclaimed concrete, resulting in reduced greenhouse gas emissions compared to traditional concrete. The DEIS specified that "Rock berm or concrete mattress separation layers would be installed prior to cable installation, while the rock berm or concrete mattress cover layers would be installed after cable installation. Any rock berm separation and cover layers would be installed using suitably approved rock material. The rock 2-17 berm separation and cover layers are defined by minimum geometry and vertical and horizontal tolerances. The amount of cable protection would be as required for suitable coverage and technical agreements with respective asset owners. It is assumed up to 1.48 acres</p>	<p>Thank you for your comment. BOEM has not identified a preferred or required form of scour protection in the Final EIS; however, BOEM's proposed mitigation measures outlined in Appendix H includes certain requirements or limitation to the types of cable protection that should be used. These requirements are consistent with BOEM's Guidelines for Mitigating Impacts to Commercial and Recreational Fisheries on the Outer Continental Shelf Pursuant to 30 CFR Part 585, which states, "If needed, cable protection measures should reflect the pre-existing conditions at the site. This mitigation measure chiefly ensures that seafloor cable protection does not introduce new obstructions for mobile fishing gear. Thus, the cable protection measures should be trawl-friendly with tapered or sloped edges. If cable protection is necessary in 'non-trawlable' habitat, such as rocky habitat, then the lessee should consider using materials that mirror the benthic environment." Mitigation resulting from BOEM's Magnuson-Stevens Fishery Conservation and Management Act consultation has also been incorporated into the Final EIS.</p>

Comment No.	Comment	Response
	<p>(0.6 ha) of cable protection would be required per crossing. The cable protection required for cable crossings is in addition to the secondary cable protection requirements previously described...Scour protection, if required, would cover the entire jacket footprint, extending an additional 33 to 66 ft (10 to 20 m) beyond the base of the structure and reaching a height of approximately 6.5 ft (2 m) from original seabed level. Additional CPS stabilization may be used where the IAC and SRWEC would be pulled into the foundation, which would require additional rock cover on top of the scour 2-18 protection. This additional rock cover would have a height of approximately 6.5 ft (2 m), for a total of up to 13.1 ft (4 m) height from the original seabed level, inclusive of the scour protection and CPS stabilization.” Given the aforementioned details above, all concrete materials should solely be fabricated from ecological concrete, including all cable and scour protection, in order to minimize impacts and create marine habitat opportunities. Using ecological concrete scour protection would offer the same structural benefits, with a smaller fill material footprint. Furthermore, the species that settle and grow on the ecological concrete mattress and cable protection would create a living layer providing bioprotection which hardens the structure. In a recent technical report, The Nature Conservancy (TNC) recommended nature-based designs for cable protection and scour protection. Ecological concrete technology is also featured in the Wind Energy Monitoring &amp; Mitigation Technologies Tool developed by the International Energy Agency Wind Task 34 (WREN), the Pacific Northwest National Laboratory, and the National Renewable Energy</p>	

Comment No.	Comment	Response
	Laboratory.	
BOEM-2022-0071-0158-0032	<p>The DEIS suggests that hydrodynamic effects and disturbances on benthic resources will result from the project; however, we are concerned that their extent may be underestimated. For example, the presence of structures could impact the Mid-Atlantic Cold Pool, causing changes in temperature, mixing, larval transport of important commercial and recreational fish species (e.g., sea scallops), and temperature corridors used for migration for multiple important fishery species. This is an area of ongoing research. The FEIS should clearly document what is known about potential impacts to the Cold Pool and resulting potential impacts to marine species and fisheries. The FEIS should acknowledge data gaps and ongoing research and should fully consider potential impacts resulting from this project, as well as cumulative impacts from all planned wind energy projects throughout the region.</p>	<p>Information on the Cold Pool was added under Section 3.7.3, <i>Presence of Structures</i>.</p>
BOEM-2022-0071-0158-0033	<p>The Councils are concerned about the impacts of boulder removals required for cable installation, especially when done via plow, which is the proposed method in combination with boulder grabs (page 3-420). We recommend using grabs to relocate boulders given plowing will have a much larger impact on benthic habitats than grabs. The FEIS should specify plow width and the size of the area that will be impacted. The nature of this impact is very different from dredging used to harvest seafood, and the scientific literature on fishing gear impacts is unlikely to provide a reasonable proxy for the impacts of boulder clearance plows. For example, fishermen attempt to avoid boulders to reduce the risk of costly damage to fishing gear,</p>	<p>A towed plow was proposed for installation of the cable and IAC within the SRWEC but is no longer under consideration. Other boulder removal and relocation methods proposed include using boulder grab from a Dynamic Positioning (DP) offshore support vessel (See Figure 3.3.3-5 in the September 2023 COP). The COP includes an assumption that up to 5 percent of the SRWEC-OCS, up to 30 percent of the SRWEC-NYS, and up to 10 percent of the IAC may require boulder clearance within a 30 m (98 ft) wide corridor, and that boulders would be removed from a 220-m (722-ft) radius area around each WTG and OCS-DC foundation. Sunrise Wind plans to relocate boulders that are within the designated</p>



Comment No.	Comment	Response
	and the penetration depth of fishing gear is much less than a boulder clearance plow.	boulder relocation area to the nearest point outside of the boulder relocation area to minimize the distance and disturbance to attached fauna.
BOEM-2022-0071-0158-0037	The DEIS states that “burial of the proposed SRWEC would typically target a depth of 3 to 7 ft... BOEM guidance is that all static cables be buried at the depth of 6 ft below the seabed where technically feasible” (page 2-15). The Councils have not endorsed a specific burial depth, but rather have recommended depths that are adequate “to reduce conflicts with other ocean uses, including fishing operations and fishery surveys, and to minimize effects of heat and electromagnetic field emissions” (from the BOEM Draft Fisheries Mitigation Guidance). Assuming a depth of 6 feet is sufficient to address these objectives, we recommend the FEIS include this target burial depth as the minimum end of the range.	The target cable burial depth is 6 ft (1.8 m), per BOEM guidance (see BOEM's Guidelines for Mitigating Impacts to Commercial and Recreational Fisheries on the Outer Continental Shelf; Pursuant to 30 <i>CFR</i> Part 585, dated June 23, 2022); however, this depth may not always be suitable which is why there is a range for burial depth. Based on the September 2023 COP, the depth ranged change from 3 to 7 ft (0.9 to 2.1 m) to 4 to 6 ft (1.2 to 1.8 m).
BOEM-2022-0071-0205-0024	BOEM should ensure that the project developer has conducted appropriate benthic surveys and obtained samples for all cable routes and other activities that may be impacted by existing contamination from urban and storm runoff, industry, or historic use of the site.	Thank you for your comment. The developer has followed appropriate surveys for construction.
BOEM-2022-0071-0232-0015	Invasive species on the monopiles can decrease water oxygenation levels, as demonstrated in the North Sea (Daewel, 2022). Deoxygenation can cause fish die-offs and harmful algal blooms. The North Sea has experienced an increase in harmful and costly algal blooms in recent years. The timing coincides with offshore wind installations. Harmful algal blooms carry an approximate financial burden to the economy of over \$8 billion per year (Brown, 2019). A toxic algal bloom caused an unusual and “catastrophic” die-	Respectfully, the article cited does not discuss invasive species (Daewel et al. 2022). It focuses on the changes in factors that affect primary productivity such as an increase in light penetration due to reduced mixing and increased sedimentation near WTGs. The article does note that some bottom areas would see reduced oxygen levels, again due to reduced mixing or more shallow mixed layers. The sediments modeled contain large amounts of carbon, which would be sequestered on the

Comment No.	Comment	Response
	<p>off of crabs and lobsters in the late fall/early winter of 2021 along England’s North Sea coast (Beament, 2022), soon after the construction of the largest offshore wind farm in the world, Hornsea 1 and 2. Similarly, in the year after the Block Island wind farm construction, a harmful algal bloom contaminated shellfish in Narragansett Bay with the deadly neurotoxin, domoic acid. Changes in nutrient levels correlated with toxicity (Sterling, 2022). Although an association with the Block Island Wind Farm was not considered, the timing and geographic pattern of the bloom suggest invasive filter feeders on the “artificial reefs” of the wind farm may have diminished the nutrients and prompted this harmful bloom. As a result of harmful algal blooms, this project may violate the Seafood Safety Regulations (21 C.F.R. § 123). BOEM does not adequately consider the cost, both financial and from a public health concern, of the project’s propensity to induce harmful algal blooms.</p>	<p>bottom. It also notes that areas with strong stratification, like the area near the SRWF, would see less of an effect. See also text excerpted from the Revolution Wind EIS which discusses this in more detail. (See Rev Wind EIS pg. 3.6-31). "Collectively, these findings indicate that planned and probable future wind farm development on the Mid-Atlantic OCS are unlikely to produce hydrodynamic effects on the order of those associated with European wind farm development in the southern North Sea (e.g., Christiansen et al. 2022; Daewel et al. n.d. [2023]; Dorell et al. 2022)."</p> <p>This topic is addressed in Section 3.7.5.2.2 under a discussion of the presence of structures. Algal blooms tend to be in response to increases in nutrients (eutrophication) and are exacerbated by warming ocean temperatures. There is much evidence for the causality of coastal algal blooms due to increased ocean temperatures. We discuss how the WTGs may affect ocean thermal patterns (cold pool) in the EIS.</p>
BOEM-2022-0071-0242-0068	<p>The Draft EIS classifies the substrate types as one of three benthic habitat groups: (1) large-grain complex habitats; (2) complex habitats; and (3) soft-bottom habitats. According to the Draft EIS’s classification system, large-grain complex habitats are areas where large boulders are present. Complex habitat comprises a diversity of habitat types, including areas with sediments greater than five percent gravel of any size, as well as shell substrate. Finally, soft-bottom benthic habitats consist of silt, sand, and mud substrate. In the area of the Sunrise Wind Farm and SRWEC,</p>	<p>Thank you for your comment. Cox Ledge was a consideration when determining the alternatives for the reasons you have pointed out. Figure 2.1-6 displays the location of Cox Ledge in relation to the SRWF. Surveys have determined that Cox Ledge is approximately 5 to 10 km (3.1 to 6.2 mi) north of Priority Area 1, which is the area closest to the ledge terminus. Each portion of the benthic habitat surveyed is described in Sections 3.7.1.1 through 3.7.1.7. Table 3.7-1 summarizes the sampling results including dominant substrate and</p>

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	<p>sand and mud are the predominant substrate types; however, the northwestern portion of the Project Area contains areas where gravel and boulder substrates are predominant.</p> <p>The Sunrise Wind Farm is in the vicinity of and overlaps Cox Ledge, an area of complex benthic habitat. In general, complex, hard bottom habitat, like Cox Ledge, provides EFH for a number of species, including both juvenile and adult Atlantic cod. Offshore, both juvenile and adult cod prefer structurally complex hard bottom habitats comprising mostly pebbles, cobble, and boulders. Cobble substrate is critical for the survival of juvenile cod because it helps them avoid predators. Studies have also shown that hard bottom habitats are important for cod reproduction. Atlantic cod demonstrate spawning site fidelity, meaning they return to the same bathymetric locations year-after-year to spawn.</p> <p>Boulders and cobbles, which are more prevalent in complex habitats, also provide EFH for other species such as black sea bass juveniles and adults, Atlantic sea scallop larvae, ocean pout and herring eggs, as well as certain invertebrates that attach to hard surfaces, including mussels, oysters, starfish, sea urchin, etc.</p> <p>Cox Ledge is an area of concern for fishery managers because it provides important habitat for several commercially and recreationally important species—notably, spawning habitat for Atlantic cod. Atlantic cod populations are now severely depleted and rebuilding overfished cod</p>	<p>common taxa observed to further characterize the types of habitats surveyed within each Project component area.</p>

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	<p>populations hinges on access to healthy spawning habitat and successful spawning events. The spawning cod stock in and around Cox Ledge is especially important because it is a reproductively isolated cod spawning stock.</p>	
<p>BOEM-2022-0071-0242-0069</p>	<p>In several instances, the Draft EIS observes that the presence of WTG structures, anchoring, and cable emplacement can result in long-term impacts to benthic habitats and EFH. For example, the Draft EIS explains that while anchoring and mooring activities are generally expected to be localized and short-term, they can be long-term if they occur in eelgrass beds or hard-bottom habitats. It further states that the presence of WTGs and the SRWEC will result in long-term benthic habitat disturbance and can result in long-term impacts to EFH.</p> <p>However, the recently completed Draft EIS for the Revolution Wind project provides significantly more analysis of the long-term impacts from offshore wind development on benthic habitat than the Sunrise Wind Draft EIS, noting that monopile foundations under Revolution Wind’s proposed action would “result in a direct disturbance of benthic habitats” and that these impacts “would be long term in duration.” The Revolution Wind Draft EIS is highly relevant here because the Revolution Wind Farm will be adjacent to Sunrise Wind. The Revolution Wind Draft EIS explains that “[s]oft-bottom habitats would be permanently displaced while effects on large-grained complex and complex benthic habitats would range from short term to longer term or permanent.” It also finds that the installation of monopiles and cables alters benthic habitat composition, converting existing large-grained, complex, and soft-bottom</p>	<p>Thank you for your comment. See below for the text that is already within the EIS and text that was added to address your comment.</p> <p>The following text is already included in the Final EIS in Section 3.7.3.2: "This offshore energy facility construction would involve direct disturbance of the seabed, leading to direct impacts on benthic, finfish, and invertebrate resources or degradation of sensitive habitats, including EFH."</p> <p>The following text was added in Section 3.7.3.2: "The installation of up to 94 offshore monopile foundations with associated scour protection would result in the direct disturbance and conversion of benthic habitats. The duration of these impacts would vary depending on the type of benthic habitat impacted. Disturbance of soft-bottom benthic habitat would flatten sand ripples, pits, and depressions and kill or displace habitat-forming invertebrates living on and in the seafloor within the impact footprint. Disturbance of complex benthic habitat during seafloor preparation could change benthic habitat composition by relocating boulders and cobbles and exposing soft substrates."</p> <p>Text regarding boulder relocation that would result in permanent conversion of habitats has been added. The Final EIS already includes several paragraphs detailing the succession of converted habitats and likely</p>

Comment No.	Comment	Response
	<p>benthic habitat to artificial or introduced hard surfaces and that these effects would be long-term to permanent. Likewise, for impacts from construction-related anchoring, the Revolution Wind DEIS concludes that soft bottom benthic habitats could be expected to recover within 18 to 24 months, whereas complex benthic habitats could take a decade or more to fully recover.</p> <p>The analysis in the Revolution Wind Draft EIS on potential long-term impacts to benthic habitats from offshore wind development is consistent with what has been observed at the Block Island Wind Farm. In a study of the Block Island Wind Farm, non-complex habitats, consisting mainly of sand and mud, demonstrated a high rate of recovery. Conversely, complex habitats have been shown to take longer to recover from offshore wind construction. In the Block Island study, zero percent of complex habitat areas, containing mainly cobbles and pebbles, had completely recovered from baseline conditions after the wind farm had been in operation for nearly two years. The conclusion in the Sunrise Wind Farm Draft EIS that impacts to benthic habitats are moderate, “as the overall effect would be notable but the resource would be expected to recover completely without remedial or mitigating action” is inconsistent with the analyses from nearby areas including the Block Island Study and Revolution Wind Draft EIS that both found the potential for long-term to permanent impacts on benthic habitats from offshore wind development. In the Final EIS for Sunrise Wind, BOEM should improve its analysis of the long-term impacts to benthic habitats from the Sunrise Wind project, and particularly its analysis of the long-term impacts from</p>	<p>consequences (See Section 3.7.5.2.2 under <i>Presence of Structures</i>).</p> <p>The following has been added to the conclusion of Alternative B, Section 3.7.5.6: "When placed in soft-bottom habitat, these structures would effectively change the habitat type. When placed in large-grained complex or complex habitat, these structures would either alter the habitat type or modify benthic habitat structure through burial and damage to habitat-forming invertebrates. That habitat structure would recover and would evolve over time into functional benthic habitat as reef effects mature. In all cases, the presence of structures would constitute a long-term to permanent impact to benthic habitat."</p> <p>Regarding anchoring, the 18- to 24-month recovery is stated in the Final EIS and backed up by several references used in Revolution Wind. The EIS states, "In areas of seafloor disturbance, benthic habitat recovery and mobile and sessile benthic infaunal and epifaunal species abundances may take 1 to 3 years to recover to preimpact levels, based on the results of a number of studies on benthic recovery (e.g., Hutchison 2020a, Carey et al. 2020; Guarinello and Carey 2020; AKRF et al. 2012; Germano et al. 1994; Hirsch et al. 1978; Kenny 1994). Based on a review of impacts of sand mining in the U.S. Atlantic and Gulf of Mexico, soft-bottom communities within the cable corridors would recover within 3 months to 2.5 years (Kraus and Carter 2018; Brooks et al. 2006; BOEM 2015; Normandeau Associates 2014). A separate review of case studies from cable</p>

Comment No.	Comment	Response
	<p>the installation of WTG structures, cable emplacement, and anchoring, and explain any inconsistencies between its conclusions in the Sunrise Wind Draft EIS and Revolution Wind Draft EIS.</p>	<p>installations in Atlantic and Pacific temperate zones concludes that recovery of benthic communities on the OCS (less than 262 ft [80 m] depth) occurs within a few weeks to 2 years after plowing, depending on the available supply of sediment (Brooks et al. 2006). Recovery time varies somewhat with the method of installation, with more rapid recovery after plowing than jetting (Kraus and Carter 2018)."</p> <p>The conclusion stated in Section 3.7, <i>Benthic Resources</i> is reflective of conclusions stated by Revolution Wind (see last paragraph, pg. 3.6-8 in Revolution Wind). The conclusion sections of the two EISs are extremely similar, although it is important to note, the Revolution Wind EIS is proposing up to 100 WTGs and while the Sunrise Wind EIS is proposing up to 94 WTGs and a lower limit of 80 WTGs (Alternative C-3c), and some of their impact conclusions differ accordingly. Several sentences have been added to the conclusion sections of the Proposed Action to replicate text from Revolution Wind and emphasize the similarity in effects and conclusions.</p>

**O.6.5. Birds**

**Table O-14. Responses to Comments on Birds**

Comment No.	Comment	Response
BOEM-2022-0071-0232-0029	<p>Sunrise Wind will occupy a site within the migratory Atlantic flyway region and will thereby add additional stress to four (4) endangered bird species, including the Piping Plover, the Red Knot, Roseate Tern, and the Black-capped Petrel (App E2; BRI, 2022). Two threatened eagle species, the Golden Eagle and the Bald Eagle reside in RI as well. RI is home to the Norman Bird Sanctuary, a 325-acre nature preserve overlooking Rhode Island Sound, as well as the adjacent 242-acre Sachuest Point National Wildlife Refuge. Both sanctuaries provide a vital stopover and wintering area for migratory birds. The continued development of this region with offshore wind farms could violate the Endangered Species Act (16 U.S.C. §§1531-1544), the Migratory Bird Treaty Act (16 U.S.C. §§ 703 et seq.), and the Bald and Golden Eagle Protection Act (16 U.S.C. §§ 668-668d). 432 bird species in North America risk extinction. Birds with coastal habitats are particularly vulnerable (Schwemmer, 2022). Current methods for assessing an offshore wind farm’s risk to birds remain inadequate (Green, 2016), underestimating the impact of wind farms on bird mortality (Skov, 2016). The BOEM DEIS does not adequately address the direct, indirect, or cumulative impacts of Sunrise Wind on bird mortality.</p>	<p>The most recent literature and data were used to prepare a separate Biological Assessment for USFWS Section 7 consultation under the ESA for listed bird species. Based on a review of all relevant literature, our conclusion remains the same.</p>

Comment No.	Comment	Response
<p>BOEM-2022-0071-0242-0044</p>	<p>The DEIS correctly identifies key federally listed species such as Piping Plover, Red Knot, and Roseate Tern as having potential to occur in or near the Project Area. The plover is also state-listed endangered in New York and threatened in Massachusetts. Red Knot is state-listed threatened in both New York and Massachusetts, and the tern is state-listed endangered in both states. At least 12 bird species of conservation concern have been detected within New York State Breeding Bird Atlas Survey Blocks that overlap with onshore facilities slated for this Project. Roseate Terns also may forage for small prey fish in the shallower waters near the location of the Sunrise Wind Export Cable, New York State (SRWEC–NYS), and may occur over the sites of both SRWEC–NYS and SRWEC–Outer Continental Shelf during migration. New York state-listed Common Tern also has potential to occur over the Project during migration.</p> <p>Red Knot, Piping Plover, and Roseate Tern all migrate through offshore waters at the Project as well as other nearby wind energy project sites in the region. Past tracking studies clearly indicate that at least some individuals of all three species can pass through Rhode Island and Massachusetts offshore wind lease areas. Consequently, the post-construction monitoring programs for all three of these listed species should remain effectually robust to detect any impacts offshore.</p> <p>We are pleased that Ørsted and Eversource will provide Motus wildlife tracking tags to continue studying ESA-</p>	<p>Thank you for this information. The Biological Assessment completed for Section 7 consultation with USFWS included the information from Loring et al. (2018). The analysis for the Final EIS was updated in Section 3.8.5.2.2 with this additional information to properly assess the potential impact to listed bird species.</p>



Comment No.	Comment	Response
	<p>listed birds. Radio-tagged bird movements in the vicinity of the Project would be monitored for up to three years post-construction during spring, summer, and fall. The total number and location(s) of offshore receiver stations would be selected to optimize study goals with a design tool now under development with a NYSERDA project. A tagging study of ESA-listed bird presence/absence in the wind farm would be compared to similar detections at coastal receiver towers, with an aim to understand occurrence of these birds by time of day, season, and weather conditions.</p> <p>Although the risk assessment for Piping Plover states that the latest historical breeding records on Block Island are in the early 2000's, in fact the plover nested there in 2021 and 2022. In addition, focusing on islands closest to Sunrise Wind could lead to underestimating risk to the local breeding population, since the bulk of the New England population of Piping Plovers nests in Massachusetts. The New England subpopulation of Piping Plover is also the only subpopulation along the Atlantic Coast that has reached and exceeded its recovery target—all other subpopulations (i.e., Canada, NY-NJ, Southern) have yet to reach targets set by the recovery plan. Based on nano-tagging data, many of the Piping Plover nesting in southeastern Massachusetts are likely to fly over or near the Project at the start of their migration, which places this key subpopulation at risk.</p>	

Comment No.	Comment	Response
BOEM-2022-0071-0242-0046	<p>Birds other than imperiled species are also potentially vulnerable to impacts from offshore wind or have uncertain population trends in relation to expanding footprints of wind energy infrastructure in the region. Moreover, larger-bodied species of birds can make better study subjects for understanding migratory connectivity and for determining optimal locations for population monitoring and mitigation. We note that no birds other than those discussed above, including pelagic marine species, are the subject of any part of the Sunrise Wind monitoring framework. The lack of monitoring efforts for non-ESA listed (but still vulnerable) focal bird species around wind energy infrastructure seems like an oversight. For example, recent tracking of White-winged Scoters in southern New England has revealed frequent commuting flights between Nantucket Sound and Long Island Sound, which would result in overflights of wintering Scoters in the Project Area despite their habit use generally being in shallower waters. Risk to this species may thus be higher than predicted, and further monitoring attention is warranted.</p>	<p>Appendix H includes a variety of bird mitigation and monitoring including a Post-construction Avian and Bat Monitoring Framework.</p>
BOEM-2022-0071-0242-0047	<p>Baseline and site characterization surveys of marine birds in and near the Project have revealed a diverse assemblage of diving marine birds present seasonally, including cormorants, sea ducks, alcids, and loons. MDAQ baseline surveys typically reveal such diving species to be present at and near Sunrise Wind during winter and spring. Given that no data is available for some diving species in some seasons, the temporal and spatial resolution used in future bird surveys may need to be</p>	<p>Additional information from McGrew et al. 2022 has been added to the EIS. While noise generated from pile driving and G&amp;G surveys will overlap with hearing ranges for diving birds, very little information exists on the risk of injury to diving birds from underwater sound sources. Without bird-specific information, we assume that marine birds have relatively similar physiology to marine mammals for the purpose of risk assessment (phocid pinnipeds due to similarity of hearing profile).</p>

Comment No.	Comment	Response
	<p>increased to adequately determine sensitivity of all diving species to impacts like underwater acoustic disturbance.</p> <p>When studied, underwater hearing abilities for diving bird taxa are found to be more sensitive than expected, with hearing thresholds in the frequency band 1–4 kHz comparable to those measured in seals and toothed whales. Diving marine birds foraging &lt;100 km away from seismic operations change their foraging direction during acoustic disturbance, increasing the distance between their feeding areas and the sound source. Avoidance distances by diving seabirds to sounds generated from anthropogenic activities manifest at spatial scales up to tens of kilometers, very similar to the displacement distances reported in cetaceans from seismic surveys.</p> <p>The monitoring framework for Sunrise Wind does not assess how acoustic disturbances from construction and related operations may cause harm to diving marine birds. We refer specifically to lethal or sublethal injury from sound pressure waves caused by high intensity acoustic pulses, not to avoidance or temporary displacements after changes in behavior. Because seabird taxa sensitive to this impact are more prevalent during winter, minimization activities like curtailment may be justified to abate harm. Capable of diving to 180 m depths, Razorbills also flush from loud noises, they are prevalent during winter in waters of the Project Area, and like other alcids they are already vulnerable to</p>	<p>With the included and required 10 dB of broadband sound attenuation for offshore pile driving associated with monopile foundations and the OCS-DC foundation pin piles, the area of potential injury for diving birds from a single strike of an impact hammer is expected to be relatively small, less than 10 m (32.8 ft) from the pile for Permanent Threshold Shift (PTS) (see COP Appendix I1). The risk of other pressure-induced injuries or mortality would have even smaller areas of potential effects. Because of the flushing behaviors and avoidance anticipated from the noise disturbance, and the capability of birds to leave the water, the potential for PTS and Temporary Threshold Shift (TTS) is considered unlikely to occur.</p>

Comment No.	Comment	Response
	<p>displacement and macro-avoidance.</p> <p>Densities of diving birds are typically highest in winter months on inner and middle shelf habitats, at least in this portion of the Atlantic OCS. Therefore, shifting the construction season for pile-driving and other noisy operations may eliminate underwater acoustic disturbance to diving birds. If time/area closures are not practical, safety zones (e.g., shut downs or low power operations if large diving bird flocks enter a predefined zone) or methods for sound abatement should be considered.</p> <p>Noise monitoring and abatement during impulsive pile driving operations for monopile installation has been an established practice in Atlantic wind energy project areas. Distances to the injury-causing sound levels measured in one study varied from 0.7 to 3.1 km for marine mammals during the installation activities. Consequently, adequate spatial buffers or suitable observation distances may be necessary for the study designs used to monitor avian reactions to subsurface acoustic disturbance.</p>	
BOEM-2022-0071-0242-0049	To reduce long-term phototactic attraction of wildlife to offshore lighting, Sunrise Wind’s construction and operational lighting would be limited to the minimum necessary to ensure safety and compliance with applicable regulations, an approach that is hoped to minimize impacts on avian species. Under BOEM lighting guidelines and best management practices	The Final EIS includes a full description of lighting associated with installed WTGs and the OCS-DC. Lighting will include proximity activated obstruction lighting and navigational lights. Aviation obstruction lights would be medium intensity flashing red lights and be operated using an Aircraft Detection Lighting System. This would only activate the aviation obstruction lights when

Comment No.	Comment	Response
	<p>(BMPs), Sunrise Wind will use Aircraft Detection Lighting Systems, dimming, or shielding to limit visual impact, pursuant to approval by the FAA, commercial and technical feasibility at the time of FDR/FIR approval, and dialogue with stakeholders. Such reduced lighting practices are anticipated to reduce the potential for impacts to avian species, although no provisions for studying avian response(s) to lights has been made in the monitoring framework.</p> <p>We stress that phototaxis (disoriented attraction of birds drawn from some distance to lights on turbine towers) creates conditions in which the bird numbers attracted will scale as the square of the range from which they are drawn, thereby greatly increasing potential for adverse impacts (i.e., higher collision risk). More research and monitoring is needed to measure distances at which phototaxis operates in seabirds (especially the susceptible procellariiforms). In the context of collision with turbine blades, the probability of collision is inflated by flux density as disoriented birds pass repeatedly through rotor swept areas. Neither the avian risk assessment nor the avian monitoring framework address a potential of high flux density caused by turbine-associated phototaxis.</p> <p>Previous research indicates that spatial responses of marine birds to offshore wind infrastructure can consist of (1) displacement around, (2) attraction to, (3) or neutral association with the overall project footprint.</p>	<p>aircraft are in the vicinity of the wind farm, typically reducing the illuminated time by more than 99 percent. Navigation lights would operate at night and would consist of low (2 nm [2.3 mi; 3.7 km] visibility) to moderate intensity (5 nm [5.8 mi; 9.3 km] visibility) flashing yellow lights. Only significant perimeter structures would have the moderate intensity lights (perimeter structures every 2 km [1.2 mi]). All other structures would use low intensity flashing lights. Based on the minimal lighting used, vastly reduced operational time for aircraft avoidance lights, and the use of flashing lights only, we believe nighttime lighting will not alter attraction or avoidance patterns for birds compared to unlit structures.</p>

Comment No.	Comment	Response
	<p>One large literature review of North American and European avian reactions to wind farms indicates that displacement in offshore habitats is 2–3 times more prevalent than attraction. Across 71 peer-reviewed studies, avian displacement distances from turbines (mean ± standard deviation) ranged from 116 ± 64 m in Anseriformes (ducks), 2,517 ± 5,560 m in Charadriiformes (gulls, terns, shorebirds), and 12,062 ± 6911 m in Gaviiformes (loons).</p>	
<p>BOEM-2022-0071-0242-0050</p>	<p>Sunrise Wind seeks to evaluate avoidance rates of marine birds using a one-to-two-year cross-project radar study to detect macro and potentially meso-scale avoidance rates at the project site. Although some information on avoidance can be helpful to advance understanding of both displacement and collision vulnerability, no descriptions or citations are given for the study design(s) that would be applied to evaluate how avian displacement is manifest at Sunrise Wind and associated wind farms.</p> <p>Study design is especially important here given the suggestion that wide spacing of WTGs at Sunrise Wind is thought to reduce risk of barrier effects and/or displacement, and allow avian and bat species to avoid individual WTGs and minimize risk of potential collision. To detect differences in avian distribution pre- and post-construction, surveys must be designed and implemented to account for detection bias, to adequately cover the lease area and its surroundings, and to collect data at the necessary resolution. The avian</p>	<p>Thank you for your thoughts on micro avoidance. These thoughts will be taken under consideration as the avian and bat post-construction framework is developed into a plan.</p>

Comment No.	Comment	Response
	<p>monitoring framework makes no mention of how to detect or estimate micro-avoidance (i.e., the behavioral ability of birds and bats to make last minute adjustments at small scales to avoid collision with rotors and other turbine structures).</p>	
<p>BOEM-2022-0071-0242-0044</p>	<p>Avian risks from offshore wind energy development can be curtailed first and foremost by avoiding concentrations of marine birds on the OCS. Optimal siting relies on some measure of severity in spatial conflict between bird protection and efficient generation of offshore wind power. Sunrise Wind lies outside the primary use areas of most coastally breeding bird species, yet also far enough away from elevated marine bird concentrations at and beyond the continental shelf edge. The offshore distances for the Project (&gt;24.1 km) thereby allows the Project to avoid offshore habitats with the highest aggregate abundance of marine birds, appropriately following the mitigation hierarchy.</p>	<p>Thank you for your comment.</p>

**O.6.6. Coastal Habitat and Fauna**

**Table O-15. Responses to Comments on Coastal Habitat and Fauna**

Comment No.	Comment	Response
BOEM-2022-0071-0242-0074	<p>Regarding the SRWEC landing, the COP states that Sunrise Wind intends for landfall to take place within Fire Island National Seashore. Sunrise Wind intends to employ a horizontal directional drilling (HDD) method for burying the SRWEC at the cable landing in the Fire Island National Seashore. Sunrise Wind also intends to employ HDD for the portion of the SRWEC route that traverses the Intracoastal Waterway between Fire Island and the mainland. The COP observes that the SRWEC route in the Intracoastal Waterway may cross under submerged aquatic vegetation (SAV) habitats, consisting of both eelgrass and Widgeon grass, and macroalgal mats that are considered HAPC for summer flounder and that the use of HDD will avoid impacts to these habitats.</p> <p>The use of HDD for cable landing has been found to avoid and minimize impacts to benthic and coastal habitats. Indeed, the Draft EIS finds that by crossing under the seabed, the use of HDD would avoid most impacts to benthic habitats and subaquatic vegetation in the Intracoastal Waterway. The Draft EIS notes that installation of the cable via HDD would “avoid direct impacts to marine vegetated habitats as this methodology avoids disturbance to the seafloor.” This, in turn, would avoid and</p>	Text has been added in Section 3.9.5.1.1 under 'cable emplacement'. Please keep in mind that IPFs and potential impacts discussion follows that documented in OCS Study BOEM 2019-036 and is intended to ensure that all information regarding potential impacts to coastal habitats and fauna are provided to the public.



Comment No.	Comment	Response
	<p>minimize impacts to the summer flounder HAPC in the area of the Intracoastal Waterway.</p> <p>Given that the SRWEC landfall will occur within a national seashore and that the Intracoastal Waterway includes SAV designated as HAPC for summer flounder, the use of HDD is crucial for avoiding and minimizing environmental impacts. Although Sunrise Wind has already committed to employing HDD for the project's landfall and for traversing the Intracoastal Waterway, BOEM should require use of HDD as a condition for project approval.</p>	

**O.6.7. Commercial Fisheries and For-Hire Recreational Fishing**

**Table O-16. Responses to Comments on Commercial Fisheries and For-Hire Recreational Fishing**

Comment No.	Comment	Response
BOEM-2022-0071-0147-0005	I also noticed that there are several instances where the effects offshore wind construction is compared to the effects of commercial fishing. I think these assumptions are inappropriate within an offshore wind DEIS. As stated at the beginning of the DEIS, this report “assesses the potential biological, socioeconomic, physical, and cultural impacts that could result from the construction and installation, operations and maintenance (O&M), and conceptual decommissioning of the Sunrise Wind Farm” NOT the fishing industry.	The impacts to the fishing industry correlate to economic and employment impacts to many businesses and individuals in the GAAs; therefore, although commercial fishing may not be a "resource" in the context of the Proposed Action, it warrants full analysis to understand the potential impacts.
BOEM-2022-0071-0158-0022	Table 3.6.1-1 through Table 3.6.1-11 include average commercial fishing landings and revenue data over many years. While this is helpful to gain a broad understanding of the level of revenue exposure in the lease area and cable routes, including data by year is most helpful, similar to what is provided in NOAA’s Socioeconomic Impacts tool. This annual information is displayed in a poster in the virtual meeting room, however, it does not appear to be included within the DEIS for commercial fishing, like it is for for-hire fisheries. Fisheries revenues can fluctuate for a variety of reasons (changing fish distributions, change in fishing regulations, market factors, etc.), therefore, an average value may not always accurately describe the economic value of the fishery.	Final EIS Tables 3.14-1 and 3.14-11 (previously Tables 3.6.1-1 and Table 3.6.1-11 in the Draft EIS) have been updated with newer data that became available following the release of the Draft EIS. It is understood that landings and revenue fluctuate due to many variables from year to year. However, by including both the average annual and peak annual statistics for each category, as well as providing data across a sufficient year range (in this case, 14 years), the information provided is sufficient for the purposes of the EIS analysis. For additional data, the reference is provided which directs readers to the NOAA Socioeconomic Tool.

Comment No.	Comment	Response
BOEM-2022-0071-0158-0023	We recommend better characterizing which commercial and recreational fisheries and fish species would be affected by various stages of wind development and why. Unless necessary to protect confidential data, grouping data across all FMPs is not particularly helpful given the impact determinations could differ by fishery and species.	Data for the Revenue Exposure Analysis is primarily available at the Fishery Management Plan fishery level. A qualitative discussion of certain species' impacts relative to the different areas in and around the Lease Area is presented within the discussion of Alternative C-1 in Section 3.14.6, as the potential location of WTGs may incrementally change potential impacts on certain species depending on habitat.
BOEM-2022-0071-0158-0024	Table 3.6.1-13 includes the number of vessels and outliers in the lease area by year; however, the table description and corresponding text do not include a description on what is meant by 'outliers.' This is a term that is typically used for observations that lie an abnormal distance from other values in a sample. Only the text on a preceding page indicates that the outliers are vessels that derived a high proportion of its revenue from the lease area. No analysis is presented that shows this determination used standard statistical techniques, for example, the third quartile plus 1.5 times the interquartile range is a standard approach to estimating 'mild' outliers. The FEIS should describe specifically how these outliers were determined. In some years, 15% of the vessels are characterized in this way, which is a large percentage, suggesting the underlying data generally cover a narrow range of values, but with a substantial number of vessels falling outside the range. In addition to documenting the methods, we suggest calling these vessels "highly dependent", including more detailed table captions and column headers for tables, and including cross references to tables in the corresponding	The data presented in Final EIS Tables 3.14-12 and 3.14-13, and depicted in Figure 3.14-2, are derived from NOAA's planning-level assessment for the Sunrise Wind Lease Area. The definition of the outlier in the context of this analysis is presented within the text and associated footnote, as documented within NOAA's analysis. Note, this data was also updated based on new information that became available since the release of the Draft EIS, essentially expanding the years covered.

Comment No.	Comment	Response
	text.	
BOEM-2022-0071-0158-0026	Highly Migratory Species (HMS) trips are only briefly mentioned on page 3-689 and do not include any corresponding data tables or specific information by species. We recommend including the number of trips, landings, and revenue by species in the fisheries affected environment and impact section.	Highly migratory species are discussed in Section 3.14 in several instances, such as Table 3.14-4, which includes average and total revenue as well as the average number of vessels and vessel trips in the Lease Area, Table 3.14-5, which includes the average and total pounds of landings in the Lease Area, and Table 3.14-22, which provides estimates on revenue exposure from the Proposed Action. In addition, additional text and Figure 3.14-9 has been included in Section 3.14.1.2, <i>For-Hire Recreational Fishing</i> , which presents fishing effort for highly migratory species in the Greater Atlantic.
BOEM-2022-0071-0158-0027	Pages 3-408, 3-419, and 3-425 reference the potential for commercial and for-hire recreational vessel operators to switch gear types and to target less-valuable species. These may not be feasible approaches for fishermen given the high cost, potentially lower prices, and different permits that would be required. Such adaptation would only occur over the longer term and may require fishery management changes.	Text has been added to indicate this may not be feasible for fishermen based on these conditions. The Final EIS acknowledges that targeting less productive fishing grounds and/or less valuable species would not alleviate all impacts, but may be what certain fishermen choose to do.
BOEM-2022-0071-0158-0028	The fisheries revenue exposure compares FMP revenue exposure within the lease area to the total annual FMP revenue in the Mid-Atlantic and New England regions. This comparison minimizes the potential impact of lease development on fisheries. We recommend comparing revenue exposure to a more geographically specific area or port	In the Final EIS, two new revenue exposure tables have been included that present the revenue exposure based on port and state.

Comment No.	Comment	Response
BOEM-2022-0071-0158-0029	<p>The DEIS describes commercial and recreational fisheries within the lease area and the export cable corridor. Some fisheries will be impacted by activities within both the lease area and the export cable corridor, while other fisheries will be primarily impacted by one or the other. It is important to consider the differences in impacts due to the different activities which will occur in the lease area and the cable corridor and the different fisheries that operate in those areas. Different mitigation measures may also be relevant for the two areas. For these reasons, we support the approach of analyzing the lease area and export cable corridor separately in terms of their impacts on fisheries, as well as considering their combined impacts. This approach should be carried forward in future analyses of other wind projects.</p>	<p>Due to the fact that the cable corridor impacts are temporary in nature during the construction period, a quantitative analysis of revenue exposure was determined not to be necessary.</p>
BOEM-2022-0071-0229-0018	<p>Commercial Fishing Impacts: BOEM's stated "facts" and associated "conclusions" do not match up. BOEM on one hand states that "Sunrise Wind proposed to bury all cables to a target depth of 3 to 7 ft".<sup>41</sup> But then in conclusion states that "burial to the target depth would reduce the risk of exposure and potential damage to fishing gear and a burial depth of less than six feet would increase the probability of gear interactions". How can a target burial depth of less than 6 feet (the target depth is 3-7 ft) reduce the risk of gear interactions if the risk of gear interactions is supposedly any burial depth of less than 6 feet? BOEM is stating that the target burial depth is less than 6 feet. It is completely illogical, then, for BOEM to state that the target burial depth reduces the chances of gear interaction. It does not. The conclusions</p>	<p>The text within Section 3.14, <i>Commercial Fisheries and For-Hire Recreational Fishing</i>, was revised to say a burial depth of less than 3 feet (0.9 m) would increase the probability of gear interactions. Target burial depth for is now 4 to 6 ft (1.2 to 1.8 m) as stated in the Sunrise Wind COP published in September 2023.</p>

Comment No.	Comment	Response
	must be changed.	
BOEM-2022-0071-0229-0019	<p>BOEM must also include biological impacts in the commercial fishing impacts section and translate these to commercial fishing impacts. Commercial fishing relies exclusively on the natural environment for its product. If the natural environment is affected, commercial fishing will be affected. The commercial impacts section contains no analysis- not even qualitative analysis- of impacts to fisheries resources as a result of the proposed Project’s open water cooling intake system for its OCS-DC. This is unacceptable. The full impacts to commercial fishing and commercial species as a result of the proposed Project must be conducted and quantified. BOEM cannot simply say after the fact that “fish stocks died off due to climate change” when the very Project that it is proposing creates aquatic thermal climate change in an intense and unnatural way. It is well known that open water cooling intake systems kill fish eggs and larvae through entrainment, as well as change the thermal environment that such eggs and larvae rely upon for survival. Other such studies with quantitative analysis have been conducted, and we request that BOEM do so here.</p>	<p>An analysis of potential egg and larval entrainment, as well as equivalent adult calculations, were conducted and reported in the Final EIS in Section 3.10.5.2. The OCS-DC includes mitigation measures to prevent impingement of juvenile and adult fish as well as other measures to lessen the impact on local fish.</p> <p>The minor entrainment estimates for egg and larval species would create localized, low-intensity impacts around intakes and discharges, and not have more than negligible species-level impacts on commercial fisheries or for-hire recreational fishing.</p>
BOEM-2022-0071-0248-0015	<p>It is imperative the public is able to differentiate impacts from the various alternatives presented in the DEISs to understand the suitability of prospective project alternatives. The DEISs analyze the impacts of multiple grouped alternatives primarily as modifications to the Proposed Action, rather than against each other. Using fisheries as an example, the DEISs present Impacts</p>	<p>The overall revenue exposure analysis was conducted on the Lease Area being considered. The alternatives to the Proposed Action include movement of certain WTGs from one area to another within the Lease Area for the purposes of habitat impact minimization. Therefore, as discussed in Final EIS Section 3.14.6 and 3.14.7, by reducing the impact to certain valuable habitat within</p>

Comment No.	Comment	Response
	<p>Analysis for Commercial and For-Hire Recreational Fisheries for each of the Alternatives together. That each DEIS acknowledges major adverse impacts on commercial fisheries is much appreciated.<sup>21</sup> It is unclear in the documents how impacts from the various alternatives differ from each other. Instead, the impact analysis compares the collective back to the Proposed Action, which the DEISs assume would be the most likely “Alternative”. From discussions with leaseholders in other project areas, it is our understanding that technical constraints may be realized after DEIS completion that make the Proposed Actions unfeasible. Yet, it is still the project design that all other alternatives are compared against.</p>	<p>the Lease Area, that would in turn have a slight benefit to both commercial fisheries and for-hire recreational fishing. This is discussed qualitatively within Section 3.14.8, <i>Comparison of Alternatives</i>; however, a quantitative presentation of revenue exposure data was not completed.</p>
<p>BOEM-2022-0071-0248-0016</p>	<p>The Sunrise DEIS provides specific information on boulder removal/relocation. Inclusion of the following is much appreciated, “[t]he relocation of boulders also could increase the risk of gear stags<sup>22</sup>, as uncharged or unknown obstructions could result in damage to equipment, lost revenue and potential safety impacts.” (Sunrise DEIS, p. 3-421). More clarity should be provided on when a boulder will be removed or relocated. Areas proposed for relocation should be vetted by the fishing industry to avoid placing obstructions in fishing grounds. When a boulder is relocated, the exact original location and the location where it is being moved need to be communicated to the fishing industry. Fishermen acquire and retain knowledge and information on the location of boulders and other potential snags. These are typically marked on a vessel’s GPS chart-plotter and</p>	<p>BOEM will be proposing a Boulder Relocation Plan, which would incorporate the identification of fishing history in the area. This would propose the inclusion of identifying active areas for bottom trawl fishing (within last 5 years) and areas where boulders are expected to be relocated, methods to minimize quantity of seafloor obstructions, identification of locations of boulders to be moved and where they would be placed, and outreach with respect to the boulder relocation plan. This measure is outlined in Table H-2 and H-3.</p>

Comment No.	Comment	Response
	<p>fishing operations are designed to avoid interactions. Failure to communicate the exact locations of relocated boulders will impact safety-at-sea and increase the likelihood of gear loss and lost fishing time while making necessary repairs.</p>	
<p>BOEM-2022-0071-0248-0017</p>	<p>We assume “gear stags” is meant to read “gear snags</p>	<p>Correct, text has been revised accordingly. Thank you for your comment.</p>
<p>BOEM-2022-0071-0248-0026</p>	<p>Sustainable American fisheries rely on monitoring and data collection activities tailored toward answering key fisheries management questions, under the “best available science” mandate of the Magnuson-Stevens Act. This means available data is typically not well-suited to inform fine-scale OSW planning or test hypotheses related to its environmental impacts. This is particularly true when considering available socioeconomic data for fisheries and OSW.</p>	<p>The approach to providing revenue exposure as it relates to the Proposed Action and Lease Area was identified as a suitable means to assess potential impacts on commercial fisheries. Working collaboratively between BOEM and NMFS, the best available data was applied to the Project Area to assess impacts at scale. Due to confidentiality concerns, some fine-scale data and analyses are not possible.</p>
<p>BOEM-2022-0071-0248-0027</p>	<p>Concern remains about the datasets utilized in the DEISs to reflect commercial fishing activity in and around the Project Areas. The Sunrise DEIS utilizes VMS datasets from 2014 - 2019. We appreciate acknowledging changes that happened to the fishing industry resulting from Covid-19. We recommend extending the VMS dataset coverage for at least 10 years prior to 2014. This would allow a more informed analysis of those commercial fisheries that are required to utilize VMS. It appears Sunrise considered AIS datasets from July 1, 2018 - June 30, 2019.  This should have been updated to include April of 2016 through the publication of the COP. It bears noting that under applicable USCG regulations, not all commercial</p>	<p>New polar histograms have been included in the Final EIS that cover the years from 2014-2021. These are Figures 3.14-3 through 3.14-8. However, this newer data did not change the conclusions noted in the Final EIS.</p>



Comment No.	Comment	Response
	<p>fishing vessels are required to possess and utilize AIS. As a result, any statement which attempts to quantify fishing vessel traffic in the lease sites likely significantly underestimates the actual amount of commercial fishing traffic in the survey area.”</p>	
<p>BOEM-2022-0071-0248-0028</p>	<p>Looking at each fishery individually is the only way to fully analyze and understand the potential impacts. For example, “A total of 75 percent of the permitted vessels that fished in the Lease Area derived less than 1 percent of their total annual revenue from the area (NMFS 2022a). The highest percentage of total annual revenue attributed to catch within the Lease Area was 84 percent in 7 different years during the 2008-2020 timeframe” (Sunrise DEIS 3-392) may indicate the remaining 25% of the permitted vessels could be very reliant on the areas. By aggregating the fisheries data, the DEISs will compact effort and lose the more minor, but equally important, impacted fisheries.</p>	<p>Due to confidentiality concerns, certain datasets (such as these statistics on annual permit revenue) need to be aggregated. This information was based upon data from NOAA's planning-level assessment specific to the SRWF Lease Area. The boxplot and percentages are explained in the text, where the data shows that the majority of permit holders derive 1 percent or less of the annual revenue from the Lease Area. The point within the comment is acknowledged that the remaining 25 percent of permit holders may derive up to 85 percent of their revenue from the Lease Area by indicating that certain vessels may depend heavily on the Lease Area, but most derive a much smaller portion of their revenue from the Lease Area. The data is not available by specific fishery.</p>
<p>BOEM-2022-0071-0248-0029</p>	<p>“On average, commercial fishing activity in New England and the Mid-Atlantic generated approximately \$1.2 billion in annual ex-vessel revenue from 2010 through 2019.” (Sunrise DEIS page 3-376) While this (ex-vessel revenues) shows the economic benefits to the fishing vessels, it does not account for any downstream economic activity. Failing to identify, quantify, and assess these downstream impacts is a flaw in the DEISs analysis. In addition to analyzing economic impacts, the DEIS fails to undertake an analysis of the impacts to jobs</p>	<p>Table 3.14-25 of the EIS provides a description of the BOEM-proposed Fisheries Mitigation Measure, which includes stipulations related to loss of income due to unrecovered economic activity to offshore fishing activities, along with shoreside businesses for losses indirectly related to the Project.</p>

Comment No.	Comment	Response
	<p>in the commercial fishing/seafood industry. (See section D below) In 2018, the Mid-Atlantic seafood industry supported 136,813 jobs, while the New England seafood industry supported 211,359 jobs.</p>	
<p>BOEM-2022-0071-0248-0030</p>	<p>The commercial fishing revenue information provided needs to be put in context. There are many small businesses reliant upon access to fishing grounds within the lease areas and have developed business plans and made investments over the years with the expectation of utilizing those grounds. For example, according to Table 3.6.1-6 of the Sunrise DEIS the average annual revenues generated by Federally permitted vessels participating in the Mackerel, Squid and Butterfish fisheries within the lease areas was \$107,462. These revenues are likely indispensable to the small businesses prosecuting that fishery.</p>	<p>To enhance the visibility into potential impacts on small versus large businesses for commercial fishing operations fishing the Lease Area, two additional tables have been included in the Final EIS, Section 3.14.1.2. These are based upon NOAA's planning-level assessment and include the total number of entities by small and large business category within the northeast region (Table 3.14-13), along with their total revenue. This is then contrasted by a second table that provides commensurate information for the number of entities by small and large business categories operating within the Lease Area, along with their total revenue (Table 3.14-14). The results show that most commercial fishing operations in both the northeast region as well as within the Lease Area are considered small businesses and these small businesses also generate more total revenue overall than the large businesses.</p>
<p>BOEM-2022-0071-0248-0031</p>	<p>The DEISs fail to fully address the impacts that the projects will have on small businesses, which will include the vast majoring of fishing companies and supporting businesses. Fishermen and the fishing industry have reiterated time and time again that it is not easy for adaptation to occur because serious economic investments and management restrictions can make it prohibitive. The impacts to fishing and processing jobs must not be diminished in the DEIS analysis. As</p>	<p>To enhance the visibility into potential impacts on small versus large businesses for commercial fishing operations fishing the Lease Area, two additional tables have been included in the Final EIS, Section 3.14.1.2. These are based upon NOAA's planning-level assessment and include the total number of entities by small and large business category within the northeast region, (Table 3.14-13), along with their total revenue. This is then contrasted by a second table that provides</p>

Comment No.	Comment	Response
	<p>recommended by the U.S. Small Business Administration for Fisheries Mitigation Guidance, BOEM must conduct a Regulatory Flexibility Act (RFA) analysis of its proposals, including these DEISs, to adequately understand the impacts of offshore wind development activities on small businesses. Improved data and analyses of impacts to commercial fishing businesses, port infrastructure serving the fishing industry, port operators, marine equipment retailers, onshore processors, fish markets, and other fishing industry representatives, should inform mitigation strategies.</p>	<p>commensurate information for the number of entities by small and large business categories operating within the Lease Area, along with their total revenue (Table 3.14-14). The results show that most commercial fishing operations in both the northeast region as well as within the Lease Area are considered small businesses and these small businesses also generate more total revenue overall than the large businesses.</p>
<p>BOEM-2022-0071-0248-0035</p>	<p>Fisheries Communications Plans The Fisheries Communication Plan (FCP) for both Sunrise Wind and CVOW focus primarily on informational meetings and information dissemination. While this is an important component of any FCP, we again reiterate the importance of having a two way communication flow to ensure that fishermen are authentically included. The first step must be the development of written commitments that the developer and their representatives respect the input, inclusion and limited available time to participate in meetings. Fishermen have already put time and resources into providing feedback (through meetings and written letters described above) and nowhere indicates if or how they plan to incorporate the feedback they have already solicited. We have requested numerous times to BOEM, developers, and states to work directly with the fishing industry to provide readily accessible project information. Repeatedly, fishermen have requested</p>	<p>The Fisheries Communications Plan for the SRWF Project (Appendix B of the Sunrise Wind COP; Ørsted Offshore North America 2021) indicates several methods of two-way communication, noting different ways to collaborate and understanding the best ways to communicate with fishermen and having an "open door policy" to listen to concerns regarding offshore wind development. In addition, both a Fisheries Liaison (FL) and Fishing Representatives (FR) will be identified to assist in communication and provide a conduit between ports/communities and the developer.</p>

Comment No.	Comment	Response
	<p>Atlantic lease holding developers to improve the basic dissemination of project information—shoreside and, perhaps more importantly, on the water. RODA urges BOEM to work with us to ensure that we can effectively get critical project information to fishermen in a relevant and accessible manner. We also respectfully request that timely provision of relevant project information for these purposes in a format determined by the fishing community be a condition of any OSW permit that BOEM may issue in the future.</p>	
<p>BOEM-2022-0071-0248-0036</p>	<p>Fisheries management relies on fishery dependent and independent data collection to understand and track populations over time and to set sustainable quotas. Disruptions to survey methodology and data collection, without adequate time and analyses for adjustment, will be detrimental to our understanding of fish stocks and ultimately may lead to reduced quotas for the fishing industry. RODA acknowledges that BOEM and NMFS have recently published the final federal survey mitigation strategy but is concerned that the active surveys that overlap with Sunrise Wind and CVOW will be negatively impacted by these projects, should adapted survey methods not be implemented immediately.</p>	<p>The potential disruption of NMFS marine resource survey operations is noted within the Presence of Structures IPF in the Final EIS. Potential impacts associated with this interruption could be increased uncertainty in stock assessments and changes in the fishery quotas based on existing fishery management council rules.</p>
<p>BOEM-2022-0071-0158-0025</p>	<p>We appreciate that the DEIS includes recent fishery data and mentions impacts to NMFS scientific surveys.</p>	<p>Thank you for your comment.</p>

**O.6.8. Cultural, Historical, and Archaeological Resources**

**Table O-17. Responses to Comments on Cultural, Historical, and Archaeological Resources**

Comment No.	Comment	Response
BOEM-2022-0071-0232-0020	The project will degrade the historical value of 307 properties with historical relevance within the viewshed. Colonial landmarks attract more tourists than any other type of historical site (Cameron, 2010). Degrading these resources will have an unknown, but potentially indescribable and irreparable negative impact. The impact on historic properties violates the Historic Preservation Act (Public Law 89-665; 54 U.S.C. 300101 et seq.) The DEIS minimizes the impact on our cultural heritage and does not consider the difference between colonial history and other types of historical landmarks.	EIS Section 3.16 assesses impacts from the Proposed Action and the NEPA Alternatives on the local economy while EIS Section 3.21 assesses impacts on recreation and tourism. Historic properties are addressed under Cultural Resources in EIS Section 3.15. As stated in Section 3.15 of the EIS: "Both NEPA and the National Historic Preservation Act (NHPA) require federal agencies to "stop, look, and listen" before making decisions that could negatively impact cultural resources (CEQ and ACHP 2013). NEPA requires federal agencies to assess the impacts or effects of a proposed Federal action to the human environment, including historic and cultural effects/impacts (40 CFR § 1500-1508). Historic and cultural impacts/effects are assessed by determining the significance of potential impacts to cultural resources. Section 106 of the NHPA requires federal agencies to take into account the effects of their undertakings on historic properties (36 CFR § 800.1)." BOEM has reviewed technical reports completed by Sunrise Wind to both identify historic properties that may be affected by the Project and to assess the Project's effects to those potentially affected historic properties. BOEM has deemed these reports complete and sufficient.
BOEM-2022-0071-0249-0002	Our comments address numerous deficiencies: (1) the DEIS is inadequate because it fails to take a "hard look" at impacts to historic and cultural resources by	(1) The EIS provides detailed descriptions of the impacts of the Project. The EIS Introduction, Sections 1.5 and 1.6, provides the methodology for assessing the

Comment No.	Comment	Response
	<p>undervaluing their significance, undervaluing their connections to a pristine ocean viewshed, and downplaying adverse impacts to their economies; (2) the DEIS fails to consider all direct, indirect, and cumulative effects of Sunrise Wind and other reasonably foreseeable wind farms; (3) BOEM has failed to comply with Section 106 of the National Historic Preservation Act; (4) BOEM has failed to use all possible planning to minimize harm to National Historic Landmarks as required by Section 110(f); and (5) BOEM has misclassified critical documents that require public scrutiny. If BOEM or any other cooperating agency, such as the U.S. Army Corps of Engineers, relies on the DEIS in its current form, any decision the agency makes will be arbitrary, capricious, and contrary to law.</p>	<p>environmental impacts used for this federal action in accordance with NEPA requirements and other regulatory frameworks. Chapter 2 of the EIS provides information on how alternatives were scoped, including scoping meetings for public involvement. Chapter 3 of the EIS identifies the affected environment, including as it relates to cultural resources and historic properties, provides the basis for IPFs for affected resources, and analyzes impacts;</p> <p>(2) direct, indirect, and cumulative effects of Sunrise Wind and other reasonably foreseeable wind farms is analyzed with the Final EIS;</p> <p>(3) BOEM is addressing all of the regulatory requirements of the NHPA Section 106 process, including NEPA substitution, as it proceeds through the NEPA analyses;</p> <p>(4) BOEM is fulfilling its responsibilities to give a higher level of consideration to minimizing harm to NHLs, as required by NHPA Section 110(f), through the implementation of the special requirements outlined at 36 <i>CFR</i> 800.10 (BOEM 2021). BOEM will continue consulting with the NPS, Advisory Council on Historic Preservation, and other consulting parties to further minimize harm to NHLs and the resolution of adverse effects to historic properties; and (5) BOEM has handled all of the critical documents appropriately.</p>
BOEM-2022-0071-0249-0003	<p>BOEM has failed to uphold its obligations to properly inform the public in the DEIS and through public meetings about the full range of Sunrise Wind’s anticipated effects as NEPA requires. NEPA is designed to ensure that the public and decision-makers are</p>	<p>The EIS document provides a detailed description of the impacts of the Project. The EIS Introduction and Sections 1.5 and 1.6 provide the methodology for assessing the environmental impacts used for this federal action in accordance with NEPA requirements and other</p>

Comment No.	Comment	Response
	<p>provided with the information they need to make a considered decision about the best path forward. The statute is also designed to ensure that federal agencies have carefully and fully contemplated the environmental effects of a proposed action. In addition to considering impacts on the natural environment, NEPA requires federal agencies to consider impacts on historic and cultural resources. By focusing the permitting agency’s attention on the environmental consequences of its proposed action, NEPA “ensures that important effects will not be overlooked or underestimated only to be discovered after resources have been committed or the die otherwise cast.” In other words, NEPA requires that federal agencies take a “hard look” at the environmental consequences of a proposed action.</p> <p>In addition to assessing all impacts to the natural environment, BOEM must fully assess and consider all direct, indirect, and cumulative impacts on cultural and historic resources. But the DEIS falls short of NEPA mandates that require consideration of all adverse effects because BOEM has failed to integrate properly its NEPA and NHPA reviews, preferring instead to integrate in name only, but not in substance.</p> <p>BOEM has not taken a hard look at Sunrise Wind, but rather has placed its thumb on the scale in favor of granting approval by considering only alternatives that could best be described as supporting Sunrise Wind’s preferences. The Newport Parties and Block Island Parties are longstanding stewards of some of the</p>	<p>regulatory frameworks. Chapter 2 of the EIS provides information on how alternatives were scoped, including scoping meetings for public involvement. Chapter 3 of the EIS identifies the affected environment, including as it relates to cultural resources and historic properties, provides the basis for IPFs for affected resources, and analyzes impacts. BOEM is addressing all of the regulatory requirements of the NHPA Section 106 process, including NEPA substitution, as it proceeds through the NEPA analyses. BOEM informed the public and all NHPA Section 106 consulting parties (that would use the NEPA process) to substitute for the steps in the Section 106 process when it releases the NOI for the Project. BOEM has engaged in, currently engages in, and will continue to engage in consultation with Tribal Nations, State Historic Preservation Offices (SHPOs), the Advisory Council on Historic Preservation (ACHP), and other consulting parties involved in historic preservation within the development areas. BOEM’s historic preservation specialists have conducted technical sufficiency reviews of all cultural resource studies conducted by the Lessee to identify historic properties. BOEM historic preservation specialists have determined that the cultural resources investigations performed by the Lessee were aligned with relevant BOEM and state requirements for cultural resources investigations; employed technically sound methodologies; and were conducted by qualified professionals that meet or exceed the Secretary of the Interior’s qualifications. BOEM provided comments on these documents and requests</p>

Comment No.	Comment	Response
	<p>nation’s most significant historic and cultural resources, yet BOEM refuses to consider the unique history of their communities or consider adequately the Project’s specific impacts to these communities, including harm to their tourism economies, their financial well-being, and greater sensitivity that heritage tourists have to the loss of historic character and context.</p>	<p>for additional information as needed and after careful review ultimately determined that the efforts to identify historic properties within the onshore, offshore, and visual Area of Potential Effects (APE) met the reasonable and good faith standard as described in 36 <i>CFR</i> 800.4 (b)(1) and in the ACHP's published guidance titled Meeting the "Reasonable and Good Faith" Identification Standard in Section 106 Review. Using the information provided in the cultural resource investigation reports, BOEM historic preservation specialists assessed potential adverse effects to historic properties following the process outlined in 36 <i>CFR</i> 800.5. Through their independent review, the BOEM historic preservation specialists determined that approval of the SRWF COP would result in adverse effects to historic properties. BOEM summarized the results of its review in a Finding of Adverse Effect that was shared with consulting parties on December 16, 2022. Through these efforts and the analysis conducted as part of the NEPA review, it is BOEM's opinion that it examined, in detail, the impacts to historic and cultural resources and has applied the Criteria of Adverse Effect as described in 36 <i>CFR</i> 800.5 (a). While assessing adverse economic impacts to historic and cultural resources is not required under NEPA or the NHPA, an assessment of potential economic impacts to tourism and recreation can be found in Section 3.21 of the Final EIS.</p>



Comment No.	Comment	Response
BOEM-2022-0071-0249-0004	<p>For example, although the DEIS notes that the “setting of recreation and tourism is highly dependent upon the viewscape of the area,” the DEIS does not contemplate the effect of the wind turbine generators (WTGs) on Block Island’s and Newport’s tourism economies—or the effect that Sunrise Wind will have on historic properties within these communities that depend on visitor revenue—from adverse visual effects other than to dismiss the risk. To the extent that the DEIS suggests that industrial-scale visual turbine blight would benefit historic communities, our clients object. BOEM’s conclusion is not supported by credible research.</p>	<p>Comment acknowledged. EIS Section 3.16 assesses impacts from the Proposed Action and the NEPA alternatives on the local economy, while EIS Section 3.21 assess impacts on recreation and tourism.</p>
BOEM-2022-0071-0249-0007	<p>Multiple wind farms are in development off the coasts of Rhode Island and adjacent states. These offshore wind projects will have both separate and cumulative adverse visual impacts upon historic properties, sites, and districts listed or eligible for listing in the National Register of Historic Places. DEIS, This Project, and how it is evaluated and permitted, will set a precedent for upcoming projects in the area and along the entire Atlantic Coast; therefore, it is essential to apply consistent criteria to this project and subsequent future sites.</p>	<p>The EIS analyzes the cumulative impacts of the Project in relation to other reasonably foreseeable future offshore wind projects. These analyses specifically include cumulative analysis of adverse effects from visual impacts to aboveground historic properties (also referred to as National Register of Historic Places (NRHP)-eligible viewshed resources). BOEM’s 2020 Guidelines for Providing Archaeological and Historical Property Information Pursuant to 30 <i>CFR</i> Part 585 and BOEM’s 2021 Assessment of SLVIA of Offshore Wind Energy Developments on the Outer Continental Shelf of the United States were followed in the compilation of the Historic Resources Visual Effects Analysis (HRVEA) and CHRVEA that this EIS references and are being used consistently across BOEM project documents.</p>

Comment No.	Comment	Response
BOEM-2022-0071-0249-0008	Due to the historic integrity of historic properties within the Project Area and Area of Potential Effects, BOEM must establish and implement best practices. Based on the omissions described above, the DEIS should be amended to reflect—and the Final EIS should include—a complete cumulative assessment of all impacts to historic and cultural properties and include additional cumulative visual simulations for the Town of New Shoreham’s and City of Newport’s historic properties, including those reasonably foreseeable effects that adjacent wind farms will generate.	In the CHRVEA and BOEM's Finding (see EIS Appendix J), BOEM applies the criteria of adverse effect (at 36 <i>CFR</i> 800.5) in considering cumulative effects to all historic properties in the APE. BOEM has determined that only when the Project has adverse visual effects would the Project incrementally contribute to cumulative adverse effects. Visual adverse effects from the Project, and consequently cumulative adverse effects, were determined at 47 aboveground historic properties that are analyzed in the CHRVEA. BOEM maintains that the visualizations prepared for the Project VIA, HRVEA, CHRVEA, and National Historic Landmark (NHL) supplementation documentation present a broad range of lighting and atmospheric conditions appropriate to assess the potential visual effects to historic properties located in the APE. BOEM finds the documentation acceptable and sufficient to enable any reviewing parties to understand the basis of BOEM's determinations and findings on the undertaking under NHPA Section 106 (per 36 <i>CFR</i> 800.11 (a)).
BOEM-2022-0071-0249-0011	Section 106 of the National Historic Preservation Act (NHPA) requires BOEM to address impacts to historic properties and find ways through consultation to avoid, minimize, or mitigate adverse effects. As part of the federal government’s policy of protecting the nation’s historic heritage and sense of orientation as an American people, Section 106 requires federal agencies to consider the effects on historic properties of projects they carry out, assist, fund, permit, license, or approve throughout the country.	BOEM has notified the NPS, as a delegate of the Secretary of the Interior, and the Advisory Council on Historic Preservation (ACHP) of BOEM’s determination of adverse effect to NHLs with the distribution of BOEM’s Finding of Adverse Effect (the Finding). BOEM provided the Findings to the NPS, ACHP, and other NHPA consulting parties on December 16, 2022. The ACHP and NPS have been active consulting parties on the Project since BOEM invited them to consult at the initiation of the NHPA Section 106 process upon the Project's Notice

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	<p>If a federal or federally-assisted project has the potential to affect historic properties listed or determined eligible for listing in the National Register of Historic Places, a Section 106 review is required.<sup>12</sup> During Section 106 review, once historic properties have been identified in coordination with the applicable State Historic Preservation Officer, the federal agency charged with permitting the proposed project must find ways to avoid, minimize, or mitigate adverse effects to those properties in consultation with parties who have a demonstrated interest in the undertaking. Moreover, BOEM must undertake all possible planning to minimize harm to all adversely affected National Historic Landmarks, pursuant to Section 110(f) of the NHPA.<sup>14</sup> This has not occurred. Section 110(f) provides: Prior to the approval of any Federal undertaking which may directly and adversely affect any [NHL], the head of the responsible Federal agency shall, to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to such landmark, and shall afford the Advisory Council a reasonable opportunity to comment on the undertaking. Notwithstanding Section 110(f)'s mandate, as discussed below BOEM has not demonstrated compliance with the heightened level of scrutiny that Section 110(f) requires.</p>	<p>of Intent on August 31, 2021. BOEM is fulfilling its responsibilities to give a higher level of consideration to minimizing harm to NHLs, as required by NHPA Section 110(f), through the implementation of the special requirements outlined in 36 <i>CFR</i> 800.10. BOEM provided NHL supplemental documentation for the Project, which includes additional visualizations of offshore wind facilities in relation to each of the NHLs in the APE, to consulting parties on December 16, 2022. As noted in BOEM's documentation, Project alternatives are able to avoid adverse effects on seven of the eleven NHLs in the APE and have considered various factors in minimizing adverse effects to the four remaining NHLs, in addition to proposing mitigation measures in the MOA. BOEM is taking into account all prudent and feasible measures proposed by consulting parties to avoid, minimize, and mitigate adverse effects on NHLs. BOEM remains in consultation with consulting parties to finalize these measures and implement them under the MOA. Where adverse effects would remain, BOEM would refine, through consultation, minimization measures to the maximum extent feasible and further develop mitigation measures of adverse effects that remain at the four NHLs after the application of minimization efforts. BOEM would identify and finalize mitigation measures specific to each NHL with the consulting parties through the development of the MOA. Mitigation measures for adverse effects on NHLs must be reasonable in cost and not be determined using inflexible criteria, as described by the NPS (2021b). Mitigation of adverse effects on the</p>

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		<p>four NHLs would meet the following requirements:</p> <ul style="list-style-type: none"> <li>• Reflect the heightened, national importance of the property and be appropriate in magnitude, extent, nature, and location of the adverse effect;</li> <li>• Focus on replacing lost historic resource values with outcomes that are in the public interest, such as through development of products that convey the important history of the property; and</li> <li>• Comply with the Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings (NPS 2017).</li> </ul>
BOEM-2022-0071-0249-0012	<p>The documents BOEM provided for review, as drafted, fall short of the NHPA’s mandates that require consideration and resolution of all adverse effects. By contrast, BOEM downplays them. In reviewing Sunrise Wind’s visual simulations, our clients have serious concerns regarding the assessment of adverse effects to these properties. Without additional visualizations to and from historic properties, including all NHLs, consulting parties cannot understand how Sunrise Wind and projects cumulative to Sunrise Wind will affect their historic properties’ integrity, including their context, seaside character, and connection to a maritime setting that has historically depended on open views to and from the Atlantic Ocean. The number and density of Sunrise Wind’s turbines will create a visual mass that will have a presence of large-scale modern infrastructure on the horizon that cannot</p>	<p>BOEM has determined that the visual simulations prepared by the Lessee are adequate for assessing visual impacts. COP Appendix Q1 (EDR 2022), <i>Visual Impact Assessment</i>, further outlines the methodology for developing the simulations as part of the technical report and subsequent findings. The current visual simulations sufficiently demonstrate the visibility of the proposed Project structures from the selected KOPs.</p> <p>BOEM has determined that the visualizations prepared for the Project VIA, HRVEA, CHRVEA, and NHL supplementation documentation present a broad range of lighting and atmospheric conditions appropriate to assess the potential visual effects on historic properties located in the APE. BOEM finds the documentation acceptable and sufficient to enable any reviewing parties to understand the basis of BOEM’s determinations and findings on the undertaking under NHPA Section 106 (per</p>

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	<p>be avoided.</p>	<p>36 CFR 800.11(a)). BOEM follows all applicable laws on the Project, including those described in the regulatory framework in EIS Section 1.3.</p> <p>BOEM does not find the HRVEA and supporting VIA visualizations to underrepresent the size or number of WTGs. Numerous visualizations are provided in the VIA, HRVEA, and CHRVEA for a range of high-contrast conditions from various KOPs. It is neither feasible nor required to simulate all potential viewing conditions for BOEM to determine whether individual historic properties would be adversely affected and to accurately characterize the nature of any such adverse effects. The KOPs were selected to provide a range of vantages and elevations (e.g., bluffs, coastlines, landscape features) with unobstructed views toward the Project and, therefore, represent views with the greatest scope of change from existing conditions. The visualizations presented in the HRVEA were created methodically to accurately characterize views of the Project from representative viewpoints throughout the APE.</p> <p>Consistent with BOEM’s guidance and extensive analyses of visual effects conducted over the previous decade on offshore wind facilities, the VIA and HRVEA contain extensive field photography and visualizations to accurately depict how the Project would appear from vantages throughout the APE. The Project visualizations have been prepared by qualified consultants and reviewed by BOEM’s visual and Section 106 subject matter experts, to best support robust and accurate characterization of Project visibility. BOEM is uniquely</p>

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		<p>experienced in preparing and evaluating visual studies for offshore wind facilities, and has consistently moved to incorporate best practices from ongoing research. BOEM’s guidance and requirements are applied sufficiently in the HRVEA, CHRVEA, and VIA for the Project.</p> <p>BOEM’s review and consultation on the Project remain ongoing, and BOEM welcomes continued input that will improve its NHPA Section 106 and other regulatory reviews and consultation. Please note that simulations and visualizations are only one supporting aspect of BOEM’s analyses for adverse effects to historic properties, including NHLs and Traditional Cultural Properties (TCPs) important to Tribal Nations, and not the entire basis of the assessment of effects. The VIA and HRVEAs for the Project provide detail on the fuller contexts of the visual impacts analyses.</p>
BOEM-2022-0071-0249-0013	<p>However, BOEM cannot reasonably expect consulting parties to understand the full extent of Sunrise Wind’s adverse visual effects. The visual simulations that BOEM has provided are too limited in nature and not only preclude meaningful consultation and resolution of adverse effects, but BOEM’s continued reliance on them will result in decision making that is arbitrary, capricious, and contrary to law. Because current visual assessments and simulations do not show the actual impact of the Sunrise Wind’s turbines and associated infrastructure, BOEM must amend them to assess adverse impacts and to determine appropriate avoidance, minimization, or mitigation measures.</p>	<p>BOEM has determined that the visual simulations prepared by the Lessee are adequate for assessing visual impacts. COP Appendix Q1, <i>Visual Impact Assessment</i>, further outlines the methodology associated with the development of the simulations as part of the technical report and subsequent findings. The current visual simulations sufficiently demonstrate the visibility of the proposed Project structures from the selected KOPs.</p> <p>BOEM has determined that the visualizations prepared for the Project VIA, HRVEA, CHRVEA, and NHL supplementation documentation present a broad range of lighting and atmospheric conditions appropriate to assess the potential visual effects on historic properties</p>

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		<p>located in the APE. BOEM finds the documentation acceptable and sufficient to enable any reviewing parties to understand the basis of BOEM’s determinations and findings on the undertaking under NHPA Section 106 (per 36 <i>CFR</i> 800.11(a)). BOEM follows all applicable laws on the Project, including those described in the regulatory framework in EIS Section 1.3.</p> <p>BOEM does not find the HRVEA and supporting VIA visualizations to underrepresent the size or number of WTGs. Numerous visualizations are provided in the VIA, HRVEA, and CHRVEA for a range of high-contrast conditions from various KOPs. It is neither feasible nor required to simulate all potential viewing conditions for BOEM to determine whether individual historic properties would be adversely affected and to accurately characterize the nature of any such adverse effects. The KOPs were selected to provide a range of vantages and elevations (e.g., bluffs, coastlines, landscape features) with unobstructed views toward the Project and, therefore, represent views with the greatest scope of change from existing conditions. The visualizations presented in the HRVEA were created methodically to accurately characterize views of the Project from representative viewpoints throughout the APE.</p> <p>Consistent with BOEM’s guidance and extensive analyses of visual effects conducted over the previous decade on offshore wind facilities, the VIA and HRVEA contain extensive field photography and visualizations to accurately depict how the Project would appear from vantages throughout the APE. The Project visualizations</p>

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		<p>have been prepared by qualified consultants, and reviewed by BOEM’s visual and Section 106 subject matter experts, to best support robust and accurate characterization of Project visibility. BOEM is uniquely experienced in preparing and evaluating visual studies for offshore wind facilities, and has consistently moved to incorporate best practices from ongoing research. BOEM’s guidance and requirements are applied sufficiently in the HRVEA, CHRVEA, and VIA for the Project.</p> <p>BOEM’s review and consultation on the Project remain ongoing, and BOEM welcomes continued input that will improve its NHPA Section 106 and other regulatory reviews and consultation. Please note that simulations and visualizations are only one supporting aspect of BOEM’s analyses for adverse effects to historic properties, including NHLs and TCPs important to Tribal Nations, and not the entire basis of the assessment of effects. The VIA and HRVEAs for the Project provide detail on the fuller contexts of the visual impacts analyses.</p>
BOEM-2022-0071-0249-0015	BOEM expects consulting parties to guess at what visual simulations would look like to and from Newport’s and Block Island’s historic properties. For example, BOEM has submitted visual simulations from the Newport Cliff Walk and the Southeast Lighthouse, but not from the Bellevue Avenue Historic District or Ocean Drive Historic District. <sup>16</sup> And for the visual simulations that BOEM has submitted, such as the Newport Cliff Walk, New Shoreham Beach, Clayhead Trail, or Mohegan	BOEM maintains that the visualizations prepared for the Project VIA, HRVEA, CHRVEA, and NHL supplementation documentation present a broad range of lighting and atmospheric conditions appropriate to assess the potential visual effects to historic properties located in the APE. BOEM finds the documentation acceptable and sufficient to enable any reviewing parties to understand the basis of BOEM’s determinations and findings on the undertaking under NHPA Section 106 (per 36 <i>CFR</i> 800.11



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	<p>Bluffs, wind turbines are not shown at full contrast such as they would appear during sunrise and sunset. Nor has BOEM has prepared a visual simulation from The Breakers or Marble House even though they are designated as individual NHLs. These oversights are surprising considering BOEM’s duty to assess adverse effects on all historic properties. Moreover, failure to include visual simulations from all NHLs is evidence of not using all possible planning to minimize harm.</p>	<p>(a)).</p>
<p>BOEM-2022-0071-0249-0020</p>	<p>In addition, considering the magnitude of Sunrise Wind’s adverse effects on the landscape and visual blight Sunrise Wind will cause, BOEM should consider Newport County’s and Block Island’s historic landscapes for eligibility as traditional cultural properties so that BOEM can assess adverse effects more accurately, rather than downplaying them. The historic properties located in these extraordinarily well-preserved places maintain ties to living communities who continue to preserve, maintain, and associate these properties with cultural practices, traditions, lifeways, and social institutions—many of which are located with NHL districts or as individually designated NHLs, such as the Southeast Lighthouse—and who continue to appreciate, occupy, and use these properties.</p>	<p>BOEM appreciates the comment. Table 3.15-5 in the Final EIS summarizes work completed to identify historic properties within the HRVEA's APE. This includes 150 properties in Rhode Island, most of which are in Newport and Block Island. The HRVEA identifies adverse effects on 29 of the 150 historic properties in Rhode Island. These include two NHL districts and one individual NHL in Newport. On Block Island, this includes multiple historic districts and individual properties along the coast, with the districts representing residential, commercial, agricultural, and military themes, along with cultural landscapes. The previously identified districts included in the HRVEA and CHRVEA evaluations cover themes mentioned in this comment. Based on the properties evaluated, and the adverse effects recommendations for those properties, BOEM believes that the significant landscapes in this comment have been included in the analysis and adverse effects have been appropriately identified. If Cultural Heritage Partners and its clients do not agree that the landscapes are adequately accounted for, BOEM would encourage Cultural Heritage Partners</p>

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		<p>and its clients to draft a proposal for evaluating Newport County’s and Block Island’s historic landscapes for eligibility on the NRHP as traditional cultural properties and to resolve adverse effects to historic properties within those landscapes. The recommended study would add to our knowledge of the interrelationships between individual properties and the larger landscape. An integrated assessment of the Newport County and Block Island historic landscapes, if determined eligible, could allow for better assessment of potential adverse effects during future National Historic Preservation Act Section 106 reviews of federal undertakings.</p>
<p>BOEM-2022-0071-0249-0021</p>	<p>Descriptions about Newport and Block Island are illustrative of the traditional, historic relationship of these communities to their pristine ocean settings and the connections living communities continue to have to their settings and celebrate. BOEM, however, has not explored these connections and thus not provided the deeper level of historic property identification and analysis that Newport and Block Island merit.</p>	<p>To support the identification of historic properties within the APE, BOEM has reviewed the findings of historic resources visual investigations conducted by the SRWF Lessee. The Lessee has submitted reports prepared for Sunrise Wind by EDR, including the Onshore Above-ground Historic Properties Report and Desktop Research conducted for the HRVEA for the WTGs and OCS-DC. The reports provided information for 307 above-ground historic resources within the Preliminary Area of Potential Effects (PAPE) previously identified as viewshed resources for field reconnaissance survey and viewshed analysis of the APE for onshore Project components. Investigations were aligned with relevant BOEM and state survey guidelines, and requirements. BOEM conducted technical sufficiency reviews of these documents to determine if the cultural resources investigations performed by the Lessee were aligned with relevant BOEM and state requirements, employed</p>

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		<p>technically sound methodologies, and whether BOEM concurred with the findings/recommendations of the report authors. BOEM provided comments on these documents and submitted requests for additional information as needed. After careful review, BOEM determined that the efforts to identify historic properties within the onshore, offshore, and visual APE met the reasonable and good faith standard as described in 36 <i>CFR</i> 800.4 (b)(1) and in the Advisory Council on Historic Preservation's published guidance titled Meeting the "Reasonable and Good Faith" Identification Standard in Section 106 Review. BOEM determined that each of the studies summarized above was logically designed to identify eligible properties that could be affected by the undertaking, without being excessive or inadequate. Properties were identified based on previous planning, research and studies, the magnitude and nature of the undertaking, the nature and extent of potential effects on historic properties, and the likely nature and location of historic properties within the APE. Each study adequately investigated the horizontal and vertical limits of their respective APE, effectively utilized previous studies/investigations to develop investigation plans, and were aligned with relevant federal and state investigation standards, previous investigations, and best practice. BOEM determined that the investigations were designed and carried out by qualified individuals who met or exceeded the Secretary of the Interior's qualifications for cultural resources professionals, and that said investigations were appropriate to the nature and scale</p>

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		of the undertaking. As a result of these reviews, BOEM determined that the cultural resource investigations conducted by SRWF meet the reasonable and good faith standard to identify historic properties.
BOEM-2022-0071-0249-0024	Going forward in revising Sunrise Wind’s DEIS and technical reports, BOEM must employ common sense in its assessment of Newport’s and Block Island’s historic properties’ character and setting, and work closely with consulting parties (as opposed to consultants) to understand how people in these communities— including historic property owners who were never notified about this permitting process— interact with these properties and how Sunrise Wind will adversely affect these properties individually and cumulatively.	Throughout the NHPA Section 106 consultation, BOEM has sought to involve the public per the requirements of 36 <i>CFR</i> 800.2. On August 4, 2021 BOEM invited over 115 potential consulting parties to participate in the NHPA Section 106 review of the SRWF undertaking. Throughout the NHPA Section 106 review, BOEM has added consulting parties that have demonstrated interest in the undertaking and have requested to participate, including federally recognized Tribal Nations, state or historical tribal governments, local governments, nongovernment organizations, and property owners. BOEM further welcomed recommendations from invited consulting parties on any organizations, local governments, or members of the public they believed BOEM should include in the consultation process as per 36 <i>CFR</i> 800.3(f). In addition, per the processes and procedures outlined at 36 <i>CFR</i> Part 800.2 (d)(3) and 36 <i>CFR</i> Part 800.8, BOEM utilized the NEPA Public Scoping meetings held on September 16, 20, and 22, 2021 and the Draft EIS public comment meetings held on January 18, 19, and 23, 2023 to provide members of the public, including historic property owners, with an opportunity to comment on the identification of historic properties, potential adverse effects to historic properties, BOEM’s determination of adverse effects, and propose methods to avoid, minimize, and/or mitigate adverse effects to historic

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		properties. BOEM will continue to consider, and add as appropriate, additional consulting parties who request to participate as the NHPA Section 106 process proceeds under NEPA and the NHPA.
BOEM-2022-0071-0249-0025	As evidence of BOEM’s skipping steps in the Section 106 and NEPA process, BOEM has submitted to consulting parties a draft Memorandum of Agreement (MOA) before consulting parties have had an opportunity to conclude consultation with BOEM on earlier steps in the Section 106 process.	The regulations for NHPA Section 106 coordination with NEPA require that BOEM, in consultation with identified consulting parties, develop alternatives and proposed measures that might avoid, minimize, or mitigate any adverse effects of the undertaking on historic properties and describe them in the Draft EIS. Under 36 <i>CFR</i> 800.8(c), for NEPA substitution, BOEM is required at the Draft EIS stage to identify and describe the proposed measures to resolve any adverse effects to historic properties. These measures were included in the Draft EIS to provide the opportunity for the public to review them. BOEM provided consulting parties under Section 106 the opportunity to review the draft MOA prior to its public release. The draft MOA in Draft EIS Appendix J is among the documentation in the Draft EIS that describes the measures for treating adverse effects on historic properties. BOEM proceeded with the development of these draft measures in consultation with the NHPA Section 106 consulting parties on the Project before the issuance of the Draft EIS and looks forward to receiving further input on the MOA from the consulting parties. This included the consideration and further consultation about additional mitigations proposed by consulting parties.
BOEM-2022-0071-0249-0026	Suggested minimization measures do not qualify as such. Moreover, the MOA has proposed mitigation	BOEM continues to seek input from consulting parties on measures to avoid, minimize, and/or mitigate adverse

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	<p>measures to resolve adverse effects that are not adequate, have not been requested, and do not offset the magnitude of harm that Sunrise Wind will cause. BOEM’s message to consulting parties is that whatever Sunrise Wind wants is a fait accompli and whatever consulting parties want does not matter.</p>	<p>effects for inclusion in the draft MOA.</p>
<p>BOEM-2022-0071-0249-0027</p>	<p>Moreover, our clients object to the draft MOA and proposed mitigation plans since they do not meet the standard needed for mitigation to offset unavoidable adverse effects and fail to consider the creation of appropriately capitalized historic preservation mitigation funds. Nevertheless, so that all consulting parties can understand the basis of Sunrise Wind’s mitigation proposals, and so that future consultation can be productive, we request copies before the next consultation meeting of all documents on which Sunrise Wind and BOEM have relied to show that the existing mitigation proposals are the result of all possible planning to minimize harm. This information is also needed to understand how Sunrise Wind’s proposed mitigation proposals rise to a level of “rough proportionality” relative to Sunrise Wind’s adverse effects and which would be required to offset those effects.</p>	<p>BOEM continues to seek input from consulting parties on measures to avoid, minimize, and/or mitigate adverse effects for inclusion in the draft MOA.</p>
<p>BOEM-2022-0071-0249-0028</p>	<p>Consultation is the process of “seeking, discussing and considering the views of other participants, and where feasible, seeking agreement with them regarding matters arising in the Section 106 process.” Done correctly, consultation presents opportunities for the development of creative and innovative measures for</p>	<p>BOEM continues to seek input from consulting parties on measures to avoid, minimize, and/or mitigate adverse effects for inclusion in the draft MOA. BOEM encourages Cultural Heritage Partners and its clients to submit additional proposals to resolve adverse effects on historic properties as BOEM and consulting parties work to draft</p>

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	<p>the resolution of adverse effects. However, BOEM and Sunrise Wind’s reliance on undefined mitigation measures in the draft MOA is not a workable solution, especially where BOEM and Sunrise Wind refuse to address our clients’ concerns.</p>	<p>and finalize the MOA.</p>
<p>BOEM-2022-0071-0249-0029</p>	<p>BOEM’s Draft MOA has proposed the following mitigation measures, the gist of which includes: Undefined and unfunded assessments, feasibility studies, preparation of nominations for the National Register of Historic Places, and public interpretation of coastal hazards and climate change risks for unspecified historic properties;</p> <ul style="list-style-type: none"> <li>• Undefined mitigation measures and no funding specified for Block Island’s historic properties other than a statement that Sunrise Wind “will fund fulfillment mitigation measures”;</li> <li>• a referenced but missing historic preservation treatment plan for the Southeast Lighthouse NHL; and</li> <li>• Nothing specifically dedicated to any of the NHLs or other historic properties under the jurisdiction, stewardship, or ownership of the Newport Parties, an astounding omission.</li> </ul>	<p>BOEM continues to seek input from consulting parties on measures to avoid, minimize, and/or mitigate adverse effects for inclusion in the draft MOA.</p>
<p>BOEM-2022-0071-0249-0030</p>	<p>Sunrise Wind’s proposals do not amount to acceptable mitigation for at least twenty-five to thirty years of harm to Newport’s and Block Island’s historic context, the risk that Sunrise Wind might never be decommissioned, and the indirect and cumulative financial harm our clients’ historic properties are</p>	<p>BOEM is preparing proposed mitigation measures to address visual adverse effects to historic properties. These will be presented in Historic Properties Treatment Plans (HPTPs) attached to the draft MOA (EIS Appendix J, Attachment 4), and will be consistent with the scale, nature, and range of those approved by BOEM for other</p>

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	<p>expected to experience.</p>	<p>offshore wind development projects in the vicinity, including the Vineyard Wind I and South Fork Wind Farm, through the NHPA Section 106 consultation process. All of these measures will take into account information BOEM has received in consultation under NEPA and NHPA Section 106, weighing information from past as well as current projects. BOEM looks forward to refining the proposed mitigation measures as part of ongoing consultation in the NHPA Section 106 process. Through consultation, BOEM will work to adapt and finalize the resolution of adverse effects in a revision of the MOA and its attached HPTs. NHPA Section 106 has no proportionality requirement for the mitigation of adverse effects. The regulations for NHPA, at 36 <i>CFR</i> 8090.6, provide procedures for resolving adverse effects, including for continued consultation and MOA preparation, and do not set requirements regarding the substance of mitigation. The NPS (2021b) in their non-regulatory guidance on Section 110(f), for NHLs, notes that Project alternatives must be prudent and feasible for an undertaking and consider “(1) the magnitude of the undertaking’s harm to the historical, archaeological and cultural qualities of the NHL; (2) the public interest in the NHL and in the undertaking as proposed, and (3) the effect a mitigation action would have on meeting the goals and objectives of the undertaking.” BOEM’s Finding and draft MOA consider these matters.</p>
<p>BOEM-2022-0071-0249-0031</p>	<p>As our clients have already explained, a sufficiently capitalized historic preservation mitigation fund tailored to each community, which consulting parties</p>	<p>BOEM appreciates the recommendation for a historic preservation mitigation fund to resolve adverse effects on historic properties. BOEM continues to seek input</p>



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	can deploy for needed historic preservation and coastal resiliency purposes to protect their historic properties, is the most appropriate and efficient way to offset Sunrise Wind’s adverse effects that cannot be avoided.	from consulting parties on measures to avoid, minimize, and/or mitigate adverse effects for inclusion in the draft MOA. BOEM encourages Cultural Heritage Partners and its clients to submit additional proposals to resolve adverse effects on historic properties as BOEM and consulting parties work to draft and finalize the MOA.
BOEM-2022-0071-0249-0032	Therefore, our clients object globally to the proposed mitigation offers that have not developed through consultation. What BOEM has apparently endorsed undermines Section 106’s legitimacy. Moreover, Sunrise Wind’s proposals are essentially meaningless and discount the value property owners and historic preservation advocates—including local governments—place on their historic oceanfront settings.	BOEM continues to seek input from consulting parties on measures to avoid, minimize, and/or mitigate adverse effects for inclusion in the draft MOA. BOEM encourages Cultural Heritage Partners and its clients to submit additional proposals to resolve adverse effects on historic properties as BOEM and consulting parties work to draft and finalize the MOA.
BOEM-2022-0071-0249-0034	Finally, BOEM cannot demonstrate that it has complied with Section 110(f) of the NHPA. As noted above, BOEM’s visual simulations are not adequate and ignore all but one of our clients’ NHLs. BOEM has not prepared enough of them during different seasons and times of day for consulting parties to consider them as representative samples for understanding the adverse effects of Sunrise Wind and cumulative offshore wind developments.	BOEM maintains that the visualizations prepared for the Project VIA, HRVEA, CHRVEA, and NHL supplementation documentation present a broad range of lighting and atmospheric conditions appropriate to assess the potential visual effects to historic properties located in the APE. BOEM finds the documentation acceptable and sufficient to enable any reviewing parties to understand the basis of BOEM’s determinations and findings on the undertaking under NHPA Section 106 (per 36 <i>CFR</i> 800.11 (a)).
BOEM-2022-0071-0249-0039	Here, BOEM has violated Section 304 by applying it in a blanket fashion to classify as confidential information that the public is entitled to see and that does not trigger Section 304’s application. BOEM also did not comply with the procedural requirements of Section 304 in deciding to classify documents associated with	The sensitive information on historic properties that was either summarized in publicly available documents or redacted from public documents is information that relates to the ownership, character, and location of historic properties that are not necessarily of public record, particularly archaeological sites and sites of

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	<p>Sunrise Wind, its adverse effects, and how Sunrise Wind intends to resolve them since it apparently never consulted with the National Park Service or ACHP for guidance on the issue.</p> <p>The following list of inappropriately classified documents is illustrative:</p> <p>Marked “Confidential” in DEIS</p> <ul style="list-style-type: none"> <li>• Appendix J: Finding of Adverse Effect for Historic Properties and Draft Memorandum of Agreement</li> <li>• Attachment B - Map Figures of Historic Properties in Relation to the APE</li> </ul>	<p>traditional religious and cultural significance to Tribal Nations. While BOEM shared complete, unredacted versions of all documentation with consulting parties for their review, BOEM did not publicly provide full versions of all Section 106-related documentation to the general public. However, BOEM did make public summaries or redacted versions of all such documentation to facilitate public involvement in the Section 106 process and comment on the Draft EIS.</p> <p>BOEM has consulted with the Advisory Council on Historic Preservation and coordinated with the NPS about a plan on how to handle sensitive information potentially subject to Section 304 of the NHPA. BOEM has not yet formally initiated the Section 304 consultation pursuant to 36 <i>CFR</i> 800.11(c) for the Section 106 consultation on the Project. The NPS has informed BOEM that the Section 304 regulations of the NHPA do not specify when or if an agency is required to initiate consultation with the Secretary of the Interior within the course of an ongoing Section 106 consultation. In addition, the NPS advised BOEM that it is acceptable for a federal agency to wait to disclose project findings to the public until identification of historic properties, including sites of religious and cultural significance to Tribal Nations, and until potential effects to these properties have concluded and consensus evaluations of NRHP eligibility have been completed.</p> <p>From the beginning of the Section 106 consultation for the Project, BOEM has planned to distribute these reports that contain sensitive information to the</p>

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		<p>consulting parties and to post publicly available summaries or redacted versions of Section 106-related documents to BOEM's website. The consulting parties have received all the available information and documentation associated with this Section 106 consultation, including sensitive information that could be subject to Section 304. The basis for withholding from the public the revised technical reports (reports associated with the preparation of the Draft EIS) as opposed to redacting sensitive portions and making the documents public is as follows. The documents could contain sensitive information that could be subject to Section 304 of the NHPA.</p> <p>We have publicly available summaries of the revised technical reports—the marine archaeological resources assessment (MARA), terrestrial archaeological resources assessment (TARA), and offshore historic resources visual effects analyses (HRVEA)—posted to BOEM’s website for the Project (<a href="https://www.boem.gov/renewable-energy/state-activities/sunrise-wind-construction-and-operation-plan">https://www.boem.gov/renewable-energy/state-activities/sunrise-wind-construction-and-operation-plan</a>). These summaries were posted shortly after the Project’s Draft EIS was made publicly available. The CHRVEA is available on BOEM’s website for this Project under the visual simulations tab (<a href="https://www.boem.gov/renewable-energy/state-activities/sunrise-wind">https://www.boem.gov/renewable-energy/state-activities/sunrise-wind</a>).</p> <p>The Draft EIS contains BOEM’s Finding and draft MOA with certain sensitive information redacted. The Finding in the Draft EIS includes information regarding how BOEM has delineated its APE for the Project. All</p>

Comment No.	Comment	Response
		<p>consulting parties received unredacted copies of the MARA, TARA, HRVEA, memorandum on the updated HRVEA (offshore), CHRVEA, and memorandum on BOEM’s APE delineation. The basis for making confidential the Finding and draft MOA and redacting sensitive portions of the documents for the public is as follows. As noted above, the Draft EIS Appendix J (<a href="https://www.boem.gov/renewable-energy/state-activities/sunrise-wind-draft-environmental-impact-statement-deis-commercial">https://www.boem.gov/renewable-energy/state-activities/sunrise-wind-draft-environmental-impact-statement-deis-commercial</a>) contains the Finding of Effect and the draft MOA with certain sensitive information redacted (i.e., on the character and location of archaeological and tribal historic properties). BOEM made these documents available to the public when the Draft EIS was published. The consulting parties received unredacted versions of the MARA, TARA, HRVEA, Finding of Adverse Effect, and draft MOA on December 16, 2022, which contain all the redacted information in the public versions of these documents.</p> <p>The basis for making confidential the summary and recordings of the prior two Section 106 meetings (as opposed to redacting sensitive portions and making the summary and recordings public) is as follows. The Section 106 meeting summaries and recordings contain sensitive information that could be subject to Section 304 of the NHPA. BOEM plans to produce redacted versions of the meeting summaries once we initiate Section 304 consultation with the NPS and the Advisory Council on Historic Preservation. BOEM disagrees with the assertion of other consulting parties that the Section 106</p>

Comment No.	Comment	Response
		<p>consultation cannot proceed until the NPS is consulted with and redactions are applied to reports that contain sensitive information. As explained above, the regulations implementing Section 304 do not specify when an agency must begin consulting with the NPS. In summary, all consulting parties have received all available information and documentation associated with this Section 106 consultation, including sensitive information that could be subject to Section 304, and BOEM's website contains either redacted versions of consultation-related documents or non-technical summaries of reports that contain sensitive information.</p>
BOEM-2022-0071-0249-0043	<p>We have reviewed BOEM's documents marked as confidential. Contrary to BOEM's assertions, and except for any documents or portions of documents that Tribes do not want disclosed due to their cultural sensitivity, they do not appear to contain trade secrets or privileged confidential commercial or financial information. Therefore, it is not appropriate for BOEM to keep the public from reviewing these documents by erroneously exempting them from disclosure. To correct this error, which has interfered with our ability to share BOEM's documents with local government constituents and our clients' memberships, BOEM must comply with Section 304 of the NHPA, seek determinations from the NPS and ACHP, reissue the documents without illegal confidentiality classifications, and restart the review process for all the documents that BOEM inappropriately classified.</p>	<p>The sensitive information on historic properties that were either summarized in publicly available documents or redacted from public documents is information that relates to the ownership, character, and location of historic properties that are not necessarily of public record, particularly archaeological sites and sites of traditional religious and cultural significance to Tribal Nations. While BOEM shared complete, unredacted versions of all documentation with consulting parties for their review, BOEM did not provide full versions of all Section-106-related documentation to the general public. However, BOEM did make public summaries or redacted versions of all such documentation to facilitate public involvement in the Section 106 process and comment on the Draft EIS.</p> <p>BOEM has consulted with the Advisory Council on Historic Preservation and coordinated with the NPS about a plan to handle sensitive information potentially</p>

Comment No.	Comment	Response
		<p>subject to Section 304 of the NHPA. BOEM has not yet formally initiated the Section 304 consultation pursuant to 36 <i>CFR</i> 800.11(c) for the Section 106 consultation on the Project. The NPS has informed BOEM that the Section 304 regulations of the NHPA do not specify when or if an agency is required to initiate consultation with the Secretary of the Interior within the course of an ongoing Section 106 consultation. In addition, the NPS advised BOEM that it is acceptable for a federal agency to wait to disclose Project findings to the public until the identification of historic properties, including sites of religious and cultural significance to Tribal Nations, and until potential effects to these properties have concluded and consensus evaluations of NRHP eligibility have been completed. From the beginning of the Section 106 consultation for the Project, BOEM has planned to distribute these reports that contain sensitive information to the consulting parties and to post publicly available summaries or redacted versions of Section 106-related documents to BOEM's website. The consulting parties have received all the available information and documentation associated with this Section 106 consultation, including sensitive information that could be subject to Section 304. The basis for withholding from the public all of the revised technical reports (reports associated with the preparation of the Draft EIS) as opposed to redacting sensitive portions and making the documents public is as follows. The documents could contain sensitive information that could be subject to Section 304 of the NHPA.</p>

Comment No.	Comment	Response
		<p>We have publicly available summaries of the revised technical reports—the marine archaeological resources assessment (MARA), terrestrial archaeological resources assessment (TARA), and offshore historic resources visual effects analyses (HRVEA)—posted to BOEM’s website for the Project (<a href="https://www.boem.gov/renewable-energy/state-activities/sunrise-wind-construction-and-operation-plan">https://www.boem.gov/renewable-energy/state-activities/sunrise-wind-construction-and-operation-plan</a>). These summaries were posted shortly after the Project’s Draft EIS was made publicly available. The CHRVEA is available on BOEM’s website for this Project under the visual simulations tab (<a href="https://www.boem.gov/renewable-energy/state-activities/sunrise-wind">https://www.boem.gov/renewable-energy/state-activities/sunrise-wind</a>).</p> <p>The Draft EIS contains BOEM’s Finding and draft MOA with certain sensitive information redacted. The Finding in the Draft EIS includes information regarding how BOEM has delineated its APE for the Project. All consulting parties received unredacted copies of the MARA, TARA, HRVEA, memorandum on the updated HRVEA (offshore), CHRVEA, and memorandum on BOEM’s APE delineation. The basis for making confidential the Finding and draft MOA and redacting sensitive portions of the documents for the public is as follows. As noted above, the Draft EIS Appendix J (<a href="https://www.boem.gov/renewable-energy/state-activities/sunrise-wind-draft-environmental-impact-statement-deis-commercial">https://www.boem.gov/renewable-energy/state-activities/sunrise-wind-draft-environmental-impact-statement-deis-commercial</a>) contains the Finding of Effect and the draft MOA with certain sensitive information redacted (i.e., on the character and location of archaeological and tribal historic properties). BOEM</p>

Comment No.	Comment	Response
		<p>made these documents available to the public when the Draft EIS was published. The consulting parties received unredacted versions of the MARA, TARA, HRVEA, Finding of Adverse Effect, and draft MOA on December 16, 2022, which contain all the redacted information in the public versions of these documents.</p> <p>The basis for making confidential the summary and recordings of the prior two Section 106 meetings (as opposed to redacting sensitive portions and making the summary and recordings public) is as follows. The Section 106 meeting summaries and recordings contain sensitive information that could be subject to Section 304 of the NHPA. BOEM plans to produce redacted versions of the meeting summaries once we initiate Section 304 consultation with the NPS and the Advisory Council on Historic Preservation. BOEM disagrees with the assertion of other consulting parties that the Section 106 consultation cannot proceed until the NPS is consulted with and redactions are applied to reports that contain sensitive information. As explained above, the regulations implementing Section 304 do not specify when an agency must begin consulting with the NPS.</p> <p>In summary, all consulting parties have received all available information and documentation associated with this Section 106 consultation, including sensitive information that could be subject to Section 304, and BOEM’s website contains either redacted versions of consultation-related documents or non-technical summaries of reports that contain sensitive information.</p>



Comment No.	Comment	Response
BOEM-2022-0071-0205-0027	BOEM should also ensure that all impacted tribes are properly consulted, including state recognized tribes, and non-federally recognized tribes in a geographic analysis area that is representative of their historical presence in the region. Robust consultation with tribes should be extended to Project activities that take place out of the state or region	Thank you for your comment
BOEM-2022-0071-0242-0018	<p>The construction and installation of wind turbine generators (WTGs), offshore substation, electrical support cables, operations and maintenance facilities, and port facilities as well as the development of staging areas are ground- or seabed-disturbing activities that could directly affect archaeological resources. Section 106 of the National Historic Preservation Act (NHPA) requires Federal agencies to “take into account the effects of their undertakings on historic properties.” It also gives the Advisory Council on Historic Preservation an opportunity to comment. The Section 106 process balances historic preservation concerns with the needs of federal agencies while involving interested parties.</p> <p>The DEIS notes that consultation is still ongoing and could influence potential mitigation measures. Robust consultation with states and tribes under Section 106 is paramount to ensuring the Project appropriately considers impacts on historic state and tribal resources. According to the DEIS, BOEM is consulting with the following tribes: the Mashantucket Pequot Tribal Nation, the Mashpee Wampanoag Tribe, The Delaware Nation, the Shinnecock Nation, and the Wampanoag</p>	Thank you for your comment.

Comment No.	Comment	Response
	<p>Tribe of Gay Head (Aquinnah). Although the NHPA does not require it, we urge BOEM to ensure that it has fully consulted with both relevant federal and state recognized tribes.</p>	
<p>BOEM-2022-0071-0249-0019</p>	<p>BOEM’s Technical Reports include an assessment of adverse effects. The Newport Parties and Block Island Parties object to BOEM and Sunrise Wind’s decision to discount the adverse effects of Sunrise Wind to Newport’s and Block Island’s historic character, setting, and integrity because their physical, architectural integrity will remain intact. This conclusion misses the point: The size and scale of Sunrise Wind within our clients’ historic viewsheds with its constant daytime view alteration, coupled with nighttime and construction lighting, will inexorably change the historic nature of Block Island’s and Newport’s historic properties, their feeling, their association, and the connections of these historic properties to the ocean and its unimpeded horizon, all of which were purpose built to appreciate the view.</p>	<p>Thank you for your comment, this was considered in the analysis. Please see Section 3.15.5.1.2.</p>
<p>BOEM-2022-0071-0249-0022</p>	<p>As BOEM has recognized, Newport is one of the most spectacular assemblages of American architecture from its beginning to our own time. There are structures in this district that could never be built again in such close proximity, nor possessing such variety, nor by a group of such distinguished architectural firms. This district begins with several commercial blocks including the Casino, continues with the Gothic Revival villas, and includes the “Stick Style” and Shingle Style and culminates in the great 19th century summer palaces of</p>	<p>Thank you for your comment.</p>

Comment No.	Comment	Response
	<p>Bellevue Avenue and Ochre Point. The list of architects embraces almost every major designer of that time and what emerges at Newport is also a study of the development of the taste and skill of men like Richard Upjohn, Richard Morris Hunt and McKim, Mead and White over their professional careers. Yet Newport is inseparable from the ocean and its uninterrupted views. Known to many as “The City-By-The-Sea,” Newport’s beauty and connections to the sea have inspired not only writers and other artists, but also property owners whose families have treasured their houses and history for hundreds of years, as well as those who preserve sporting traditions such as coaching along Ocean Drive, historic beach clubs, historic golf with ocean views, social institutions like the Clambake Club, and world class ocean sailing—all part of Newport’s look, feel, and association that gives it a unique sense of place that places a premium on historic preservation.</p>	
<p>BOEM-2022-0071-0249-0023</p>	<p>More rural in nature than Newport, Block Island is commonly described as a place of landscapes of sandy beaches, oceanfront bluffs, historic harbors, historic lighthouses and inns, historic oceanfront houses, and “spectacular panoramas.” It is famous around the world for the Southeast Lighthouse NHL, one of the most sophisticated lighthouses in the nation of the nineteenth century, which sits on the Mohegan Bluffs overlooking the Atlantic Ocean. In 1991, The Nature Conservancy named Block Island one of “ Last Great Places in the Western Hemisphere” because of its</p>	<p>Thank you for your comment.</p>

Comment No.	Comment	Response
	<p>unique connection to conservation. Writing for THE NEW YORK TIMES, journalist Paul Schneider compares Block Island to the Vineyard and Nantucket, proclaiming it “the crown jewel of the bunch.” And Paul G. Allen paints this picture, which generations of families and visitors have cherished and continue to prize: “There may be no better place to salute the summer on the Eastern Seaboard than at sunset happy hour on the front lawn of the majestic 130-year-old Atlantic Inn. Adirondack chairs and rockers fan out along a hill . . . as the sky turns hues of orange, purple and red.”</p>	
<p>BOEM-2022-0071-0249-0033</p>	<p>With respect to the MOA’s various planning proposals, Sunrise Wind fails to appreciate that the Newport Parties and Block Island Parties are at the forefront of climate change and already understand the type of work that needs to be undertaken to help protect historic properties in the future. But Sunrise Wind knows this because our clients have explained the types of direct mitigation activities that they would consider as meaningful and ways a historic preservation mitigation fund could be deployed. All earlier comments to BOEM related to South Fork Wind and Revolution Wind are therefore incorporated herein by reference.</p>	<p>Thank you for your comment.</p>
<p>BOEM-2022-0071-0249-0040</p>	<p>BOEM provides no way for the public to access the following documents and requires passwords for consulting parties to view them:</p> <ul style="list-style-type: none"> <li>• Cumulative Historic Resources Visual Effects Analysis – Sunrise Wind Farm Project</li> <li>• Appendix A: Figures</li> </ul>	<p>BOEM has made information about the Project public, as appropriate. In the Notice of Intent (NOI) for the Project, BOEM identified its intent to inform its Section 106 consultation by seeking public comment and input regarding the identification of historic properties and potential effects on historic properties from activities</p>

Comment No.	Comment	Response
	<ul style="list-style-type: none"><li>• Appendix B: Methodology for Cumulative Visual Simulations</li><li>• Appendix C: Cumulative Visual Simulations</li><li>• Appendix D: Key Personnel Resumes</li></ul>	associated with the approval of the COP. The NEPA scoping, hearings, and review have specifically included the presentation of the NHPA Section 106 process and information. The NEPA process and document postings are also used to provide public involvement, input, and review opportunities in accordance with NHPA Section 106 regulations (36 <i>CFR</i> 800.2 (d)(3)).

**O.6.9. Decommissioning**

**Table O-18. Responses to Comments on Decommissioning**

Comment No.	Comment	Response
BOEM-2022-0071-0232-0011	<p>The DEIS claims to evaluate the impact of decommissioning, and yet none of the studies do this. Please provide a full examination of the carbon emissions for decommissioning, the cost, and the environmental impacts. As stated in 30 CFR 585, decommissioning is a requirement. BOEM cannot approve a project, state that it insists on decommissioning, and then not include this in the DEIS. Because decommissioning might harm the environment and will cost an extraordinary amount of money, it is crucial to include the specifics in the DEIS. Given that the impact assessments depend on decommissioning, unless BOEM understands the environmental impact and is certain that decommissioning will take place from both a financial and environmental standpoint, it cannot legally approve a project based on this DEIS.</p>	<p>Emissions from decommissioning were not quantified. Sunrise Wind will apply for a separate OCS Air Permit for decommissioning activities. Over the next 25 to 35 years, equipment, marine vessels, and technology will likely change substantially, and future vessels and equipment will have lower emissions than current vessels and equipment.</p>
BOEM-2022-0071-0248-0019	<p>Given the level of disruption OSW development will cause to the local environment and the existing industries that rely on it, comprehensive mitigation strategies are essential. Collaborative layout planning, while critical to reducing some impacts, cannot fully mitigate all avoidable conflicts. Full-scale mitigation must be required as part of this process. This would include environmental mitigation, particularly full decommissioning (not conceptual, as BOEM refers to decommissioning) where the environment is restored to</p>	<p>Mitigation and monitoring is outlined in Appendix H and has been developed based on consultation with the cooperating agencies. Mitigation and monitoring suggestions from Draft EIS comments were also considered. Before decommissioning takes place, Sunrise Wind will submit a decommissioning application for technical and environmental review.</p>

Comment No.	Comment	Response
	its original state at the end of the lease period including removal of all cables, gravity bases, turbine components, and protection methods.	
BOEM-2022-0071-0248-0040	We are encouraged that a bond is to be held by the U.S. government to cover the costs of decommissioning. BOEM should disclose the bond amount to the public along with the estimated costs of decommissioning, to allow the public to consider the sufficiency of the bond and ease or raise any concerns over responsibility for uncovered expenses. Additional information on how the turbines will be disposed of after decommissioning should be provided and analyzed in future documents including the EIS.	BOEM's regulations are designed to ensure that a lessee or grantee can efficiently decommission their offshore wind facilities on the OCS. Those regulations require the Lessee to provide financial assurance to cover decommissioning costs. BOEM requires leaseholders to prepare conceptual decommissioning plans when their project is first proposed and requires more detailed plans for evaluation at the time decommissioning is requested.
BOEM-2022-0071-0248-0041	It also should be made clear to the public that decommissioning does not mean the wind energy area will be restored to its prior condition. It is possible that large amounts of materials required for OSW projects could remain in the ocean, e.g., scour protection materials and cables. This would represent the permanent conversion of soft sediment areas to those with hard structure. Qualitative conclusions of soft to hard substrate as beneficial, as this is generally believed to create habitat, fails to discuss impacts to species reliant on soft sediments. It is unclear whether this newly created, harder habitat will give other species a competitive advantage over species that prefer, or require soft bottom for their life cycle. The primary concern regarding cables remaining in the water is the dynamic nature of the seabed – scour protection is required	At the end of the Project's operational life, it will be decommissioned in accordance with a detailed Project decommissioning plan that will be developed in compliance with applicable laws, regulations, and best management practices (BMPs) at that time. It is expected that as part of decommissioning, Sunrise Wind shall survey and use its best efforts to remove the installed cable protection measures that are within two feet of the seabed surface. However, if, at the time of decommissioning, after gathering input from the appropriate regulatory agency(is), it may be agreed that it is in the best interest of the federal and state agencies to allow any such equipment to remain. For instance, there may be potential environmental and fisheries impacts associated with the removal of cable protection. The current assumption is that the SWEC will either be fully or partially removed from the seabed or

Comment No.	Comment	Response
	<p>because sediment moves and therefore cables can become uncovered. It is unclear who is responsible for uncovered cables left in the ocean after decommissioning. These cables are a major safety concern for fishing vessels operating mobile bottom tending gear as they can hang-up on cables.</p>	<p>decommissioned in situ. This information was added to Section 2.1.2.3.2 of the Final EIS. Within Section 3.7, <i>Benthic Resources</i>, it is assumed that cables would be removed during decommissioning, which would have a greater impact on benthic resources.</p>
<p>BOEM-2022-0071-0248-0038</p>	<p>BOEM has yet to include a clear decommissioning plan in any of their DEISs to date. While it is BOEM’s mandate to remove all foundations from 15 feet below the mudline, there is no clear designation of how harm will be quantified and what analyses will be conducted. We strongly encourage BOEM to not be over reliant on “conceptual” decommissioning and require developers to include a full decommissioning plan.</p>	<p>Decommissioning is described in Section 2.1.2.3. Before decommissioning takes place, Sunrise Wind will submit a decommissioning application for technical and environmental review.</p>
<p>BOEM-2022-0071-0248-0039</p>	<p>Impact analyses for O&amp;M are based upon a 35-year operational term. Yet, it is anticipated that some projects may last longer. If it is anticipated that installation will remain longer, or even permanent, analyses in the EIS must reflect these longer time periods. This is noteworthy for other ocean users, such as the fishing industry, who may be anticipating the re-opening of certain areas to fishing for future generations.</p>	<p>Based on the COP, the SRWF is planned to be operational for at least 25 years, unless the lease is extended. Impacts are analyzed for 35 years to account for a lease extension if it were to occur.</p>



**O.6.10. Demographics, Employment, and Economics**

**Table O-19. Responses to Comments on Demographics, Employment, and Economics**

Comment No.	Comment	Response
BOEM-2022-0071-0195-0004	<p>A project labor agreement (PLA) ensures the timely completion of an offshore wind development and ensures good union construction jobs, thus, conforms with BOEM’s statutory obligations. BOEM is obligated to obtain a fair return on its leases of offshore sites. 43 U.S.C. § 1337(p)(2)(A). Its leases for the development of offshore wind facilities include provisions for ongoing payments to the federal government from proceeds on electricity generated by those facilities. See, e.g., 35 C.F.R. § 585.06. PLAs ensure on-time, quality completion of projects without disruption and, thus, ensure that the government will receive its fees on a timely basis.</p> <p>Building the SRWF under a PLA serves as a beneficial impact to environmental justice communities by ensuring the beneficial health and economic effects of offshore wind inure to the benefits of those communities. In general, Black and Latinx workers who are union members are paid 29 percent and 37 percent more than those not covered by a collective bargaining agreement. A PLA ensures that all workers performing a specific trade or craft receive the same level of pay and benefits regardless of race, religion, or gender.</p>	<p>Analysis of planned activities such as port improvements, renovations and remediation, along with associated job creation are described in Section 3.16 and Appendix E. Information on salaries, training pathways, recruitment, and retention plans would vary across the supply chain and would not be under the direct control of Sunrise Wind. Hiring targets that may be included in contracts for the Project are at the discretion of Sunrise Wind and are not known.</p>
BOEM-2022-0071-0195-0006	<p>We urge BOEM to require SRWF to include in its DEIS</p> <ul style="list-style-type: none"> <li>• What steps SRWF is taking to build new facilities associated with the operations, maintenance or</li> </ul>	<p>Analysis of planned activities such as port improvements, renovations and remediation, along with associated job creation are described in Section 3.16 and</p>

Comment No.	Comment	Response
	supply chain for SRWF under a Project Labor Agreement	Appendix E. Information on salaries, training pathways, recruitment, and retention plans would vary across the supply chain and would not be under the direct control of Sunrise Wind. Hiring targets that may be included in contracts for the Project are at the discretion of Sunrise Wind and are not known.
BOEM-2022-0071-0195-0007	<p>We urge BOEM to require SRWF to include in its DEIS</p> <ul style="list-style-type: none"> <li>• What steps SRWF is taking to ensure the renovation of any facilities associated with the construction, operations, maintenance or supply chain will be done under a Project Labor Agreement</li> </ul>	Analysis of planned activities such as port improvements, renovations and remediation, along with associated job creation are described in Section 3.16 and Appendix E. Information on salaries, training pathways, recruitment, and retention plans would vary across the supply chain and would not be under the direct control of Sunrise Wind. Hiring targets that may be included in contracts for the Project are at the discretion of Sunrise Wind and are not known.
BOEM-2022-0071-0195-0008	<p>We urge BOEM to require SRWF to include in its DEIS</p> <ul style="list-style-type: none"> <li>• What steps SRWF is taking to ensure the remediation of hazards or hazardous materials from land or buildings associated with the SRWF be done under a project labor agreement at the established prevailing or industry standard wages and benefits and with adequate protections for worker and community safety</li> </ul>	Analysis of planned activities such as port improvements, renovations and remediation, along with associated job creation are described in Section 3.16 and Appendix E. Information on salaries, training pathways, recruitment, and retention plans would vary across the supply chain and would not be under the direct control of Sunrise Wind. Hiring targets that may be included in contracts for the Project are at the discretion of Sunrise Wind and are not known.
BOEM-2022-0071-0195-0009	Sunrise Wind has not declared any commitments in the DEIS about the quality of jobs in O&M activities; the creation of family-sustaining jobs where workers have a free voice in their working conditions is crucial to mitigating the employment and economic impacts of SRWF. Moreover, the existence of a labor dispute could	As noted within the COP (Table ES-1 and Section 4.7.1.2) as well as within the Final EIS (Section 3.16.5.5 and Appendix H under Table H-1 APM No. SOC-01), local workers will be hired when feasible to meet labor needs during the three phases of the Project - construction, O&M and decommissioning. Overall, the Project would

Comment No.	Comment	Response
	<p>interrupt the project’s operation, putting BOEM’s revenue at risk—and risking noncompliance with the statutory mandate of a fair return—and causing economic harm to the communities affected by the project.</p> <p>The transition to renewable energy sources can take advantage of the infrastructure and workforce created by older and fossil fuel-based technologies in New York. Storage areas, substations and power plants can be adapted and repurposed to support renewable energy production, storage and transmission</p>	<p>have economic benefits to many of the port areas that would support the phases of the Project, where, even if local workers were not hired directly by the developer, indirect and induced jobs will be created in the community.</p>
<p>BOEM-2022-0071-0195-0010</p>	<p>CJNY urges BOEM to require SRWF to include more detail in its DEIS to minimize the adverse socioeconomic effects and maximize beneficial impacts through the creation of good union careers:</p> <ul style="list-style-type: none"> <li>• What steps SRWF is taking to operate under a Labor Peace Agreement (LPA) for all Operation &amp; Maintenance directly employed and contracted workers and including those who may work on port facilities or transmission infrastructure to connect to the grid</li> </ul>	<p>Analysis of planned activities such as port improvements, renovations and remediation, along with associated job creation are described in Section 3.16 and Appendix E. Information on salaries, training pathways, recruitment, and retention plans would vary across the supply chain and would not be under the direct control of Sunrise Wind. Hiring targets that may be included in contracts for the Project are at the discretion of Sunrise Wind and are not known.</p>
<p>BOEM-2022-0071-0195-0011</p>	<p>CJNY urges BOEM to require SRWF to include more detail in its DEIS to minimize the adverse socioeconomic effects and maximize beneficial impacts through the creation of good union careers:</p> <ul style="list-style-type: none"> <li>• What steps SRWF is taking to ensure that all O&amp;M jobs for workers directly employed as well as employed by contractors will pay at least the</li> </ul>	<p>Analysis of planned activities such as port improvements, renovations, and remediation, along with associated job creation are described in Section 3.16 and Appendix E. Information on salaries, training pathways, recruitment, and retention plans would vary across the supply chain and would not be under the direct control of Sunrise Wind. Hiring targets that may be included in contracts for the Project are at the</p>

Comment No.	Comment	Response
	<p>prevailing wage rate or established industry standard wages and benefits so that good jobs are being created</p>	<p>discretion of Sunrise Wind and are not known.</p>
<p>BOEM-2022-0071-0195-0012</p>	<p>CJNY urges BOEM to require SRWF to include more detail in its DEIS to minimize the adverse socioeconomic effects and maximize beneficial impacts through the creation of good union careers:</p> <ul style="list-style-type: none"> <li>• What steps SRWF is taking to ensure it has a procurement policy for use of contractors based on best value rather than low bid, in order to fairly evaluate regulatory compliance history and fair employment practices</li> </ul>	<p>Analysis of planned activities such as port improvements, renovations, and remediation, along with associated job creation are described in Section 3.16 and Appendix E. Information on salaries, training pathways, recruitment, and retention plans would vary across the supply chain and would not be under the direct control of Sunrise Wind. Hiring targets that may be included in contracts for the Project are at the discretion of Sunrise Wind and are not known.</p>
<p>BOEM-2022-0071-0195-0013</p>	<p>CJNY encourages BOEM to assess the impacts of the Proposed Action on the workers who will be manufacturing the parts and supplies for the SRWF and integrate such assessments in the final environmental impact statement (FEIS). Again, any interruption in the supply chain for SRWF delays this crucial investment in reducing greenhouse gas emissions, and puts the economic well-being of affected communities at risk.</p> <p>BOEM can provide leadership to accelerate domestic manufacturing to support the growing offshore and onshore wind industries by incentivizing offshore wind developers to invest in domestic manufacturers and domestic manufacturing to produce the materials needed. This has the beneficial environmental impact of reduced transit times and costs, creates many more good jobs for workers in the communities where the factories or production facilities are located and</p>	<p>Section 3.16.5 provides details on the commitments Sunrise Wind has made with respect to hiring, resources allocated to seed funding, and working together with partners to develop capabilities and experience in the domestic offshore wind industry. Information on fringe benefits, salaries, training pathways, recruitment, and retention plans would vary across the supply chain and would not be under the direct control of Sunrise Wind. Hiring targets that may be included in contracts for the Project are at the discretion of Sunrise Wind and are not known.</p>

Comment No.	Comment	Response
	<p>strengthens the tax base of the local communities.</p> <p>Where new manufacturing facilities are being contemplated, we urge BOEM to incentivize location of new facilities in environmental justice communities, low-income communities, or communities adversely impacted by the transition away from fossil fuels including communities with decommissioned nuclear power plants.</p>	
BOEM-2022-0071-0195-0014	CJNY urges BOEM to require SRWF to provide more detail regarding their supply chain including: What measures SRWF will take to incentivize use of domestic manufacturing and domestic manufacturers	Section 3.16.5 provides details on the commitments Sunrise Wind has made with respect to hiring, resources allocated to seed funding, and working together with partners to develop capabilities and experience in the domestic offshore wind industry. Information on fringe benefits, salaries, training pathways, recruitment, and retention plans would vary across the supply chain and would not be under the direct control of Sunrise Wind. Hiring targets that may be included in contracts for the Project are at the discretion of Sunrise Wind and are not known.
BOEM-2022-0071-0195-0015	CJNY urges BOEM to require SRWF to provide more detail regarding their supply chain including: What measures SRWF will take to encourage labor peace agreements for its Tier 1 supply chain manufacturers	Section 3.16.5 provides details on the commitments Sunrise Wind has made with respect to hiring, resources allocated to seed funding, and working together with partners to develop capabilities and experience in the domestic offshore wind industry. Information on fringe benefits, salaries, training pathways, recruitment, and retention plans would vary across the supply chain and would not be under the direct control of Sunrise Wind. Hiring targets that may be included in contracts for the

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		Project are at the discretion of Sunrise Wind and are not known.
BOEM-2022-0071-0195-0016	CJNY urges BOEM to require SRWF to provide more detail regarding their supply chain including: What measures SRWF will take to encourage Tier 2 employers to adopt labor peace agreements	Section 3.16.5 provides details on the commitments Sunrise Wind has made with respect to hiring, resources allocated to seed funding, and working together with partners to develop capabilities and experience in the domestic offshore wind industry. Information on fringe benefits, salaries, training pathways, recruitment, and retention plans would vary across the supply chain and would not be under the direct control of Sunrise Wind. Hiring targets that may be included in contracts for the Project are at the discretion of Sunrise Wind and are not known.
BOEM-2022-0071-0195-0017	CJNY urges BOEM to require SRWF to provide more detail regarding their supply chain including: What measures SRWF will take to encourage supply chain employers to pay family sustaining wages and benefits at or above the levels that may have been established through collectively bargained agreements	Section 3.16.5 provides details on the commitments Sunrise Wind has made with respect to hiring, resources allocated to seed funding, and working together with partners to develop capabilities and experience in the domestic offshore wind industry. Information on fringe benefits, salaries, training pathways, recruitment, and retention plans would vary across the supply chain and would not be under the direct control of Sunrise Wind. Hiring targets that may be included in contracts for the Project are at the discretion of Sunrise Wind and are not known.
BOEM-2022-0071-0195-0018	There is additional information that is common across employment sectors. CJNY urges BOEM to require SRWF to address the following areas: <ul style="list-style-type: none"> <li data-bbox="562 1328 1182 1398">• What measures will SRWF take to require that the employers pay full cost of GWO training, the</li> </ul>	Section 3.16.5 provides details on the commitments Sunrise Wind has made with respect to hiring, resources allocated to seed funding, and working together with partners to develop capabilities and experience in the domestic offshore wind industry. Information on fringe benefits, salaries, training pathways, recruitment, and

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	<p>required annual anti-harassment training in New York State or any specialized training needed by workers engaged in the constructions, operations and maintenance of the project</p>	<p>retention plans would vary across the supply chain and would not be under the direct control of Sunrise Wind. Hiring targets that may be included in contracts for the Project are at the discretion of Sunrise Wind and are not known.</p>
<p>BOEM-2022-0071-0195-0019</p>	<p>There is additional information that is common across employment sectors. CJNY urges BOEM to require SRWF to address the following areas:</p> <ul style="list-style-type: none"> <li>• What measures will SRWF take to engage with its employers and union stakeholders meet to develop mutually agreeable plans to provide job opportunities for workers from environmental justice communities and workers displaced by the transition away from fossil fuels in the construction, operations and maintenance of the project</li> </ul>	<p>Section 3.16.5 provides details on the commitments Sunrise Wind has made with respect to hiring, resources allocated to seed funding, and working together with partners to develop capabilities and experience in the domestic offshore wind industry. Information on fringe benefits, salaries, training pathways, recruitment, and retention plans would vary across the supply chain and would not be under the direct control of Sunrise Wind. Hiring targets that may be included in contracts for the Project are at the discretion of Sunrise Wind and are not known.</p>
<p>BOEM-2022-0071-0195-0020</p>	<p>There is additional information that is common across employment sectors. CJNY urges BOEM to require SRWF to address the following areas:</p> <ul style="list-style-type: none"> <li>• What measures will SRWF take to make sure the jobs created are accessible by public transportation or by a SRWF shuttle or transit program so that there is not an unreasonable long commute time to the work location in order to make the jobs more accessible to workers who may not own or have access to cars</li> </ul>	<p>Section 3.16.5 provides details on the commitments Sunrise Wind has made with respect to hiring, resources allocated to seed funding, and working together with partners to develop capabilities and experience in the domestic offshore wind industry. Information on fringe benefits, salaries, training pathways, recruitment, and retention plans would vary across the supply chain and would not be under the direct control of Sunrise Wind. Hiring targets that may be included in contracts for the Project are at the discretion of Sunrise Wind and are not known.</p>
<p>BOEM-2022-0071-0195-0021</p>	<p>There is additional information that is common across employment sectors. CJNY urges BOEM to require SRWF</p>	<p>Section 3.16.5 provides details on the commitments Sunrise Wind has made with respect to hiring, resources</p>

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	<p>to address the following areas:</p> <ul style="list-style-type: none"> <li>• What measures will SRWF take to make sure employers are living up to their commitments with regard to fair employment practices</li> </ul>	<p>allocated to seed funding, and working together with partners to develop capabilities and experience in the domestic offshore wind industry. Information on fringe benefits, salaries, training pathways, recruitment, and retention plans would vary across the supply chain and would not be under the direct control of Sunrise Wind. Hiring targets that may be included in contracts for the Project are at the discretion of Sunrise Wind and are not known.</p>
<p>BOEM-2022-0071-0195-0022</p>	<p>There is additional information that is common across employment sectors. CJNY urges BOEM to require SRWF to address the following areas:</p> <ul style="list-style-type: none"> <li>• What measures SRWF will take to make publicly available fair employment policies such as requirement for Project Labor Agreements, Labor Peace Agreements, Best Value Contracting, and the adoption of prevailing wages</li> </ul>	<p>Section 3.16.5 provides details on the commitments Sunrise Wind has made with respect to hiring, resources allocated to seed funding, and working together with partners to develop capabilities and experience in the domestic offshore wind industry. Information on fringe benefits, salaries, training pathways, recruitment, and retention plans would vary across the supply chain and would not be under the direct control of Sunrise Wind. Hiring targets that may be included in contracts for the Project are at the discretion of Sunrise Wind and are not known.</p>
<p>BOEM-2022-0071-0195-0023</p>	<p>There is additional information that is common across employment sectors. CJNY urges BOEM to require SRWF to address the following areas:</p> <ul style="list-style-type: none"> <li>• What measures will SRWF take to maintain harmonious labor relations and provide information to the union stakeholders relating to the employment and working conditions of workers for the project</li> </ul>	<p>Section 3.16.5 provides details on the commitments Sunrise Wind has made with respect to hiring, resources allocated to seed funding, and working together with partners to develop capabilities and experience in the domestic offshore wind industry. Information on fringe benefits, salaries, training pathways, recruitment, and retention plans would vary across the supply chain and would not be under the direct control of Sunrise Wind. Hiring targets that may be included in contracts for the Project are at the discretion of Sunrise Wind and are not known.</p>



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		known.
BOEM-2022-0071-0195-0024	<p>There is additional information that is common across employment sectors. CJNY urges BOEM to require SRWF to address the following areas:</p> <ul style="list-style-type: none"> <li>• What measures will SRWF take to ensure high levels of workplace safety including a detailed written safety program for employees and subcontractors</li> </ul>	<p>Section 3.16.5 provides details on the commitments Sunrise Wind has made with respect to hiring, resources allocated to seed funding, and working together with partners to develop capabilities and experience in the domestic offshore wind industry. Information on fringe benefits, salaries, training pathways, recruitment, and retention plans would vary across the supply chain and would not be under the direct control of Sunrise Wind. Hiring targets that may be included in contracts for the Project are at the discretion of Sunrise Wind and are not known.</p>
BOEM-2022-0071-0195-0025	<p>There is additional information that is common across employment sectors. CJNY urges BOEM to require SRWF to address the following areas:</p> <ul style="list-style-type: none"> <li>• What measures will SRWF take to require contractors and subcontractors to certify that workers are properly classified</li> </ul>	<p>Section 3.16.5 provides details on the commitments Sunrise Wind has made with respect to hiring, resources allocated to seed funding, and working together with partners to develop capabilities and experience in the domestic offshore wind industry. Information on fringe benefits, salaries, training pathways, recruitment, and retention plans would vary across the supply chain and would not be under the direct control of Sunrise Wind. Hiring targets that may be included in contracts for the Project are at the discretion of Sunrise Wind and are not known.</p>
BOEM-2022-0071-0195-0026	<p>CJNY supports the development of the SRWF and urges BOEM to require SRWF provide more detailed and comprehensive information and to take the necessary steps to maximize the positive environmental justice, demographic, employment, and economic impacts. We appreciate the opportunity to share comments on behalf of working New Yorkers to realize a responsibly</p>	<p>Section 3.16.5 provides details on the commitments Sunrise Wind has made with respect to hiring, resources allocated to seed funding, and working together with partners to develop capabilities and experience in the domestic offshore wind industry. Information on fringe benefits, salaries, training pathways, recruitment, and retention plans would vary across the supply chain and</p>

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	and equitably developed offshore wind industry. We welcome the opportunity to further discuss our recommended mitigation measures. If you have any questions or wish to discuss our recommendations, I can be reached at <a href="mailto:lfriedlaender@climatejobsny.org">lfriedlaender@climatejobsny.org</a> .	would not be under the direct control of Sunrise Wind. Hiring targets that may be included in contracts for the Project are at the discretion of Sunrise Wind and are not known.
BOEM-2022-0071-0205-0001	The DEIS provides information related to job creation, including direct, indirect, and induced jobs. The FEIS should build on this information and include further specificity for each of these categories. The DOL's Good Jobs Initiative highlights equity and job quality requirements in their grant making process that should be strongly considered by BOEM for use in the FEIS. The equity and job quality requirements include proactively addressing racial equity; reducing barriers to opportunity; supporting the creation of good paying jobs with the free and fair choice to join a union; providing opportunities for all workers, including workers underrepresented to be trained in placed in good-paying jobs directly related to the project; utilization of Project Labor Agreements and/or Local Hire provisions, training and placement programs for underrepresented workers; and adopting an equity and inclusion program/plan focused on procurement, material sourcing, construction, inspection and hiring. These are great examples of metrics related to equity and job quality and should be considered for evaluating the job creation benefits associated with this Project.	Section 3.16.5 provides details on the commitments Sunrise Wind has made with respect to hiring, resources allocated to seed funding, and working together with partners to develop capabilities and experience in the domestic offshore wind industry. Information on fringe benefits, salaries, training pathways, recruitment, and retention plans would vary across the supply chain and would not be under the direct control of Sunrise Wind. Hiring targets that may be included in contracts for the Project are at the discretion of Sunrise Wind and are not known.
BOEM-2022-0071-0205-0002	The DEIS provides some information related to the local, regional, and domestic manufacture of components to be utilized in the project, but BOEM should make efforts	Section 3.16.5 provides details on the commitments Sunrise Wind has made with respect to hiring, resources allocated to seed funding, and working together with

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	to include greater detail in the FEIS.	partners to develop capabilities and experience in the domestic offshore wind industry. Information on fringe benefits, salaries, training pathways, recruitment, and retention plans would vary across the supply chain and would not be under the direct control of Sunrise Wind. Hiring targets that may be included in contracts for the Project are at the discretion of Sunrise Wind and are not known.
BOEM-2022-0071-0205-0003	The FEIS should specify job categories and job numbers per category resulting from each domestically manufactured component, as well as how these numbers are accounted for in the total number of direct, indirect, and induced jobs, gross state product, and personal income anticipated from the project.	BOEM does not have economic impact data on a component-by-component basis.
BOEM-2022-0071-0205-0004	The FEIS should also include an assessment of education and certifications necessary to access each job category, the training, average wages, hours, career advancement, physical demands and safety information, as well as any commitments the company has made to ensure workers have the free and fair choice to join a union, such as through a union neutrality agreement.	Section 3.16.5 provides details on the commitments Sunrise Wind has made with respect to hiring, resources allocated to seed funding, and working together with partners to develop capabilities and experience in the domestic offshore wind industry. Information on fringe benefits, salaries, training pathways, recruitment, and retention plans would vary across the supply chain and would not be under the direct control of Sunrise Wind. Hiring targets that may be included in contracts for the Project are at the discretion of Sunrise Wind and are not known. The specific education and certifications necessary for each job category for hiring are not yet known; however, the National Renewable Energy Laboratory (NREL) published a paper entitled <i>U.S. Offshore Wind Workforce Assessment</i> , which outlines the types of jobs and general requirements that could be

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		expected, including Section 3.2, <i>Education and Training</i> that breaks down a variety of programs being utilized to fill this expected workforce.
BOEM-2022-0071-0205-0005	Additional information regarding material quality, standards and certifications should also be included along with other information germane to securing a supplier contract with the offshore wind developer.	The developer would adhere to all material quality, standards and certifications required by the industry; however, these would be outlined and specified separately as part of supplier sourcing and contracting and is not required for this section.
BOEM-2022-0071-0205-0006	the FEIS should also contain information about the manufacture of offshore wind energy components that did not take place in the U.S., in order to understand the full breadth of employment benefits that could be expected as a domestic offshore wind supply chain matures.	The economic analysis does not include impacts that occur outside of the United States due to the scope of the EIS and because the available economic impact tools do not allow for these calculations.
BOEM-2022-0071-0205-0007	Similarly, for O&M (Operations and Maintenance) job impacts, the FEIS should specify O&M job categories, job numbers in each category, and how job numbers are accounted for in the total number of direct, indirect, and induced jobs, gross state product, and personal income anticipated from the project.	Final EIS Section 3.16.5 outlines the number of direct jobs that would be generated during construction and operation phases of the Project (this information is also included in COP, Appendix W, <i>Economic Modeling Report</i> ). In addition, the range of positions anticipated are outlined within the section, and include engineers, environmental scientists, financial analysts, trade workers, and other related jobs. The precise mix of job categories and associated personal income anticipated would be negotiated with Sunrise Wind on an individual basis and is unknown at this time.
BOEM-2022-0071-0205-0008	The FEIS should also include an assessment of education and certifications necessary to access those jobs, training, average wages, career advancement, hours, physical demands, and safety information, as well as any	Section 3.16.5 details the commitments Sunrise Wind has made regarding hiring, resources allocated to seed funding, and working with partners to develop capabilities and experience in the domestic offshore

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	<p>commitments the company has made to ensure workers have the free and fair choice to join a union, such as through a union neutrality agreement.</p>	<p>wind industry. Information on fringe benefits, salaries, training pathways, recruitment, and retention plans would vary across the supply chain and would not be under the direct control of Sunrise Wind. Hiring targets that may be included in contracts for the Project are at the discretion of Sunrise Wind and are unknown. The specific education and certifications necessary for each job category for hiring are not yet known; however, the NREL published a paper entitled <i>U.S. Offshore Wind Workforce Assessment</i>, which outlines the types of jobs and general requirements that could be expected, including Section 3.2, <i>Education and Training</i>, that breaks down a variety of programs being utilized to fill this expected workforce.</p>
<p>BOEM-2022-0071-0205-0009</p>	<p>The FEIS should also indicate the number of jobs, if any, require specialized experience that would prohibit workers in the U.S. from accessing those jobs, and the specific experience and training that is required.</p>	<p>Section 3.16.5 details the commitments Sunrise Wind has made regarding hiring, resources allocated to seed funding, and working with partners to develop capabilities and experience in the domestic offshore wind industry. Information on fringe benefits, salaries, training pathways, recruitment, and retention plans would vary across the supply chain and would not be under the direct control of Sunrise Wind. Hiring targets that may be included in contracts for the Project are at the discretion of Sunrise Wind and are unknown. The specific education and certifications necessary for each job category for hiring are not yet known; however, the NREL published a paper entitled <i>U.S. Offshore Wind Workforce Assessment</i>, which outlines the types of jobs and general requirements that could be expected, including Section 3.2, <i>Education and Training</i>, that</p>

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		breaks down a variety of programs being utilized to fill this expected workforce.
BOEM-2022-0071-0205-0010	When it comes to training, the FEIS should specify whether workers will need to go overseas to receive training, and the duration of that training. Given the size of offshore wind projects, the FEIS should be sure to specify jobs categories related to the operation and maintenance of every aspect of the Project, including the turbines themselves, cables, and onshore and offshore substations.	As noted in Final EIS Section 3.16.5, Sunrise Wind is providing \$10 million in seed funding to create a National Offshore Wind Training Center in Suffolk County. Together with partners from labor, academia, and the environmental community, the National Offshore Wind Training Center would feature specialized facilities and programming that is essential to offshore work, aiming to cement Suffolk County’s role as an integral part of the emerging offshore wind industry. Suffolk County Community College would serve as the academic arm of this initiative. Finally, Sunrise Wind has also committed to performing secondary steel fabrication in the New York Capital Region and funding the Upper Hudson Valley Work Force Initiative. These initiatives would ensure residents throughout New York have access to this opportunity and the training needed to succeed in the offshore wind industry.
BOEM-2022-0071-0205-0011	Any apprenticeship utilization should also be documented, and the types of apprenticeships to ensure that they are DOL-certified.	Section 3.16.5 details the commitments Sunrise Wind has made regarding hiring, resources allocated to seed funding, and working with partners to develop capabilities and experience in the domestic offshore wind industry. Information on fringe benefits, salaries, training pathways, recruitment, and retention plans would vary across the supply chain and would not be under the direct control of Sunrise Wind. Hiring targets that may be included in contracts for the Project are at the discretion of Sunrise Wind and are unknown. The specific education and certifications necessary for each

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		<p>job category for hiring are not yet known; however, the NREL published a paper entitled <i>U.S. Offshore Wind Workforce Assessment</i>, which outlines the types of jobs and general requirements that could be expected, including Section 3.2, <i>Education and Training</i>, that breaks down a variety of programs being utilized to fill this expected workforce.</p>
BOEM-2022-0071-0205-0012	<p>The DEIS provides information related to job creation in the construction of the Project. The FEIS should include all construction jobs associated with the project, including any construction jobs anticipated to prepare the port that is selected for assembly, preparation of the cable route and interconnection, and the construction or site preparation of any manufacturing facilities.</p>	<p>Final EIS Section 3.16.5 outlines the number of direct jobs that would be generated during construction and operation phases of the Project (also included in COP Appendix W, <i>Economic Modeling Report</i>). In addition, the same section also outlines the total number of jobs estimated during construction and operational phases when also including indirect and induced jobs.</p>
BOEM-2022-0071-0205-0013	<p>BOEM should specify job categories, job numbers in each category, and how job numbers are accounted for in the total number of direct, indirect, and induced jobs, gross state product, and personal income anticipated from the project. (as they relate to construction)</p>	<p>Final EIS Section 3.16.5 outlines the number of direct jobs that would be generated during construction and operation phases of the Project (also included in COP Appendix W, <i>Economic Modeling Report</i>). In addition, the range of positions anticipated are outlined within the section, and include engineers, environmental scientists, financial analysts, trade workers, and other related jobs. The precise mix of job categories and associated personal income anticipated would be negotiated with Sunrise Wind on an individual basis and is unknown at this time.</p>
BOEM-2022-0071-0205-0014	<p>The FEIS should also include an assessment of education and certifications necessary to access each job category, the training, average wages, hours, career advancement, physical demands and safety information.</p>	<p>Final EIS Section 3.16.5 outlines the number of direct jobs that would be generated during construction and operation phases of the Project (also included in COP Appendix W, <i>Economic Modeling Report</i>). In addition, the range of positions anticipated are outlined within</p>

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		the section, and include engineers, environmental scientists, financial analysts, trade workers, and other related jobs. The precise mix of job categories and associated personal income anticipated would be negotiated with Sunrise Wind on an individual basis and is unknown at this time.
BOEM-2022-0071-0205-0015	If any construction jobs require specialized experience that prohibit workers in the U.S. from accessing these jobs, that should also be detailed, including the number of jobs, as well as the training and experience required.	Final EIS Section 3.16.5 outlines the number of direct jobs that would be generated during construction and operation phases of the Project (also included in COP Appendix W, <i>Economic Modeling Report</i> ). In addition, the range of positions anticipated are outlined within the section, and include engineers, environmental scientists, financial analysts, trade workers, and other related jobs. The precise mix of job categories and associated personal income anticipated would be negotiated with Sunrise Wind on an individual basis and is unknown at this time.
BOEM-2022-0071-0205-0016	The FEIS should also specify whether workers will need to go overseas to receive training, and the duration of that training.	Final EIS Section 3.16.5 outlines the number of direct jobs that would be generated during construction and operation phases of the Project (also included in COP Appendix W, <i>Economic Modeling Report</i> ). In addition, the range of positions anticipated are outlined within the section, and include engineers, environmental scientists, financial analysts, trade workers, and other related jobs. The precise mix of job categories and associated personal income anticipated would be negotiated with Sunrise Wind on an individual basis and is unknown at this time.
BOEM-2022-0071-0205-0017	The FEIS should be sure to include the status of Project Labor Agreements (PLAs) or Community Workforce	Analysis of planned activities such as port improvements, renovations and remediation, along with



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	<p>Agreements (CWAs) associated with all aspects of the construction of the project. A PLA is an instrument to predict and control project timelines and labor costs. A PLA establishes the terms and conditions of employment of workers on specific construction projects, including wages, hours, working conditions, and dispute resolution methods. These agreements can be utilized at the state and local level to ensure high-road labor standards and timely project completion. PLAs promote safe, quality, cost-effective project delivery by providing project owners with unique access to the safest, most productive, best-trained skilled craft labor available in any given market. They can also help to ensure equitable access to jobs by including diversity, equity, and inclusion and local hire provisions. When it comes to equity, CWAs can be even more expansive and are negotiated with both unions and community partners. According to the AFL-CIO, CWAs “go well beyond the traditional experience and use of PLAs to explicitly address the legitimate needs and interests of urban communities that have historically been excluded from the benefits of economic development.” CWAs frequently include local hire provisions, targeted hire of low-income or disadvantaged workers, and the creation of pre-apprenticeship pathways for careers on the project.</p>	<p>associated job creation are described in Section 3.16 and Appendix E. Information on salaries, training pathways, recruitment, and retention plans would vary across the supply chain and would not be under the direct control of Sunrise Wind. Hiring targets that may be included in contracts for the Project are at the discretion of Sunrise Wind and are not known.</p>
BOEM-2022-0071-0205-0018	<p>Apprenticeship utilization should also be documented, and the types of apprenticeships to ensure that they are union programs or DOL-certified, as well as the ratio of apprentice to journeymen on the various job sites.</p>	<p>Section 3.16.5 details the commitments Sunrise Wind has made regarding hiring, resources allocated to seed funding, and working with partners to develop capabilities and experience in the domestic offshore</p>

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		<p>wind industry. Information on fringe benefits, salaries, training pathways, recruitment, and retention plans would vary across the supply chain and would not be under the direct control of Sunrise Wind. Hiring targets that may be included in contracts for the Project are at the discretion of Sunrise Wind and are unknown. The specific education and certifications necessary for each job category for hiring are not yet known; however, the NREL published a paper entitled <i>U.S. Offshore Wind Workforce Assessment</i>, which outlines the types of jobs and general requirements that could be expected, including Section 3.2, <i>Education and Training</i> that breaks down a variety of programs being utilized to fill this expected workforce.</p>
BOEM-2022-0071-0205-0019	<p>BOEM should be sure to include detailed information regarding training. One of the main mechanisms for building career pathways is through registered apprenticeship, preapprenticeship, and other union-affiliated training programs. Pre-apprenticeship programs aim to ensure that workers can qualify for entry into an apprenticeship program and have the skills and support they need to succeed. These programs are generally designed to target certain populations or demographics such as low-income workers, workers of color, women, and other marginalized communities. Additionally, many unions offer training throughout a member’s career to enable them to stay up to date with changes in technology. The most successful preapprenticeship programs are those affiliated with registered apprenticeships or other contractually agreed</p>	<p>As noted in Final EIS Section 3.16.5, Sunrise Wind is providing \$10 million in seed funding to create a National Offshore Wind Training Center in Suffolk County. Together with partners from labor, academia, and the environmental community, the National Offshore Wind Training Center would feature specialized facilities and programming that is essential to offshore work, aiming to cement Suffolk County’s role as an integral part of the emerging offshore wind industry. Suffolk County Community College would serve as the academic arm of this initiative. Finally, Sunrise Wind has also committed to performing secondary steel fabrication in the New York Capital Region and funding the Upper Hudson Valley Work Force Initiative. These initiatives would ensure residents throughout New York have access to this opportunity and the training needed</p>

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	<p>on-the-job training programs. Apprenticeships are registered through a state apprenticeship agency or through the Federal Department of Labor. Registered apprenticeships are paid positions that combine on-the-job training with classroom instruction in a trade. Construction unions operate robust registered apprenticeship programs while industrial unions work with employers on joint labor management training programs that also provide a combination of classroom and on-the job skills training. When these programs are paired with recruitment strategies such as partnering with a community group to provide information about workforce and training opportunities and providing wrap around services, the benefits can be even greater. Many examples of programs providing such services can be found in a recent White House Fact Sheet.</p>	<p>to succeed in the offshore wind industry.</p>
<p>BOEM-2022-0071-0205-0020</p>	<p>BOEM should also include any language access needs for the local community that may be present in order to access jobs benefits. The NEPA guidance study does not require demographics related to language or education, but BOEM should consider these and other qualities that should be taken into account to ensure jobs are accessible to a diverse workforce. Any agreements that project developers have made to increase access, be it to jobs in manufacturing, operations and maintenance, construction, or otherwise, should be detailed in the FEIS to increase transparency and the local community's ability to access these resources and benefits.</p>	<p>Section 3.16.5 provides details on the commitments Sunrise Wind has made with respect to hiring, resources allocated to seed funding, and working together with partners to develop capabilities and experience in the domestic offshore wind industry. In addition, local workers will be hired where possible.</p>

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BOEM-2022-0071-0205-0021	BOEM should include information related to employment benefits. For example, fringe benefits are allowances and services provided by employers to their employees as compensation in addition to regular salaries and wages. Fringe benefits include, but are not limited to, the cost of leave (vacation, family-related, sick or military), employee insurance, pensions, and unemployment benefits. The cost of fringe benefits in the form of employer contributions or social security, employee life, health, unemployment, and workers compensation insurance. Healthcare coverage and retirement contributions are typically included as fringe benefits, or covered in collective bargaining agreements, or other labor agreements. In the event however, that a worker is not covered by a labor agreement and an employer does not include healthcare coverage and retirement contribution as fringe benefits, the employee does not have access to employer provided health insurance or retirement contributions. In the FEIS, BOEM should include all available information related to employment benefits related to covered jobs impacts.	Section 3.16.5 provides details on the commitments Sunrise Wind has made with respect to hiring, resources allocated to seed funding, and working together with partners to develop capabilities and experience in the domestic offshore wind industry. Information on fringe benefits, salaries, training pathways, recruitment, and retention plans would vary across the supply chain and would not be under the direct control of Sunrise Wind. Hiring targets that may be included in contracts for the Project are at the discretion of Sunrise Wind and are not known.
BOEM-2022-0071-0232-0019	The executive order mandates offshore developments should stimulate economic development. Sunrise Wind, a NY development will provide a minimum of stable jobs, none of which are promised to RI. Moreover, RI hosts 21 million tourists every year. Tourism provides 11% of RI's jobs and supplies the state with 1.3 billion dollars of tax revenue (RICC, 2020). Sunrise Wind turbines will dominate the horizon from nearly every public beach in RI and will be visible from a distance of	The impact of the Proposed Action on recreation and tourism is presented in Final EIS Section 3.21. Additionally, the impact of the Proposed Action on scenic and visual resources is presented in Final EIS Section 3.22. To the extent that impacts to these two resources would impact the economy of other states has been incorporated into Section 3.16, <i>Demographics, Employment and Economics</i> .

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	<p>40 miles. The visual impact will affect over 600 popular destinations, including 178 public beaches in MA and RI. Contrary to the government’s hopeful projections, a survey in England indicates that 37% of tourism-related business owners affirm that wind farms have negatively impacted their businesses (Mordue, 2020). The BOEM DEIS minimizes the impact on tourism and does not consider the effect this will have on RI’s economy.</p>	
<p>BOEM-2022-0071-0242-0016</p>	<p>We urge BOEM to expand its analysis of offshore wind’s beneficial climate impacts. The DEIS details many of the pressing impacts that climate change presents to communities, people, wildlife, and natural resources,18 as well as the benefits offshore wind brings from carbon and other pollutant emissions reductions. However, the DEIS does not account for the climate benefits of displacing full life-cycle emissions of gas generation, which includes the release of the highly potent global warming potential of methane emissions (84 times that of CO2 on a 20-year time frame) emitted during the extraction and in the transmission and compression of gas. The DEIS also does not monetize these climate benefits using the social cost of carbon to illustrate differences between the social benefits of the Project and the relative social cost of the alternatives.</p> <p>We recommend integrating the social and environmental costs of greenhouse gas emissions into the evaluation of project impacts and impacts of alternatives. Recent interim guidance issued by the CEQ recommends that agencies “provide additional context</p>	<p>Thank you for your comment. Per Council on Environmental Quality (CEQ)'s interim guidance titled "National Environmental Policy Act Guidance on Consideration of Greenhouse Gas Emissions and Climate Change" released on January 9, 2023 (found in <i>Federal Register</i> Vol. 88, No. 5, Page 1,196), the guidance introduces the "rule of reason" (page 1,202). Offshore wind development is the development of renewable energy solutions and is overall providing a social benefit to help slow climate change impacts. Per the rule of reason, "absent exceptional circumstances, the relatively minor and short-term GHG emissions associated with the construction of certain renewable energy projects, such as utility-scale solar and offshore wind, should not warrant a detailed analysis of lifetime GHG emissions."</p> <p>GHG emissions are discussed in the EIS in Section 3.4, <i>Air Quality</i>.</p>

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	<p>for GHG [greenhouse gas] emissions, including through the use of the best available social cost of GHG (SC-GHG) estimates, to translate climate impacts into the more accessible metric of dollars, allow decision makers and the public to make comparisons, help evaluate the significance of an action’s climate change effects, and better understand the tradeoffs associated with an action and its alternatives.” The Interagency Working Group on Social Cost of Carbon has produced estimates for the social cost of carbon in order to “allow agencies to understand the social benefits of reducing [greenhouse gas] emissions, or the social costs of increasing such emissions, in the policy making process.” The working group presents values for social costs from 2020-2050, assuming discount rates of 5 percent, 3 percent, 2.5 percent and the 95th percentile of the 3 percent discount rate. These values range from \$14 to \$260 (in 2020 dollars per metric ton of CO2) and could be used to monetize the costs imposed by the net greenhouse gas emissions associated with failing to procure the approximately 33 GW of offshore wind contemplated by this DEIS.</p> <p>We urge BOEM to pursue measures to ensure that any negative impacts to environmental justice communities are mitigated and that the many environmental and economic benefits offshore wind can provide communities are maximized. One way to do this is to ensure that project construction occurs in a manner that does not create a level of pollution at any port that</p>	

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	could have deleterious impacts to that community.	
BOEM-2022-0071-0065-0019	Sunrise Wind will also help spur an offshore wind economy in New York and will bring 800 good paying jobs, plus thousands of indirect jobs, to our region. CCE is thrilled that the \$10 million National Wind Offshore Training Institute located at Suffolk County Community College in Brentwood has broken ground and will soon be educating and training the next generation in sustainable green jobs. For residents in Brentwood and several other surrounding Disadvantaged Communities, this institute along with offshore wind training programs at Farmingdale College and Stony Brook University will provide substantial jobs and economic benefits in the areas of Suffolk County that need it most.	Thank you for your comment. Economic benefits are included in Section 3.16.5.
BOEM-2022-0071-0065-0020	Sunrise Wind will also be serviced by an Operations and Maintenance Hub in East Setauket which will create 100 local jobs, while Port Jefferson harbor will be the home port of the first-ever American-flagged, Jones Act-qualified Service Operations Vessel. These local investments will help kick-start a just transition from fossil fuels to renewable energy, create both direct and indirect jobs, and provide investments in frontline and environmental justice communities. CCE thanks BOEM for their detailed breakdown of the economic and jobs benefits of these projects in the COB and DEIS	Thank you for your comment. Economic benefits are included in Section 3.16.5.
BOEM-2022-0071-0195-0001	CJNY's position is that offshore wind energy is an urgent and essential investment necessary for the transition to a clean and renewable energy economy. Equally urgent is the need to ensure that the new renewable energy economy supports high road employment practices with	Requested work/labor agreements that have been established for Construction or O&M are provided and incorporated.

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	<p>the creation of family sustaining jobs in all phases of the projects and the related industries. We support taking intentional measures to create accessible pathways to long-term careers for workers of color, people who live in environmental justice areas, workers displaced by the transition way from fossil fuels and those who have historically been left out or marginalized. Finally, because of the importance of and increasing dependence on consistent sources of renewable energy, CJNY believes that the renewable energy industry should lead on labor management partnerships, labor peace agreements, utilization of state approved training and apprentice programs with a track record of success in placing apprentices in career employment. While this project raises important environmental considerations, CJNY is focusing our comments on the project’s impact on the human environment. We support development of SRWF and urge BOEM to require the Sunrise Wind Farm to include a more detailed and comprehensive assessment and plan regarding the economic and environmental justice impacts of the project so it is developed as equitably and responsibly as possible.</p>	
<p>BOEM-2022-0071-0195-0005</p>	<p>In New York, the Building Trades Unions have partnered with pre-apprentice programs with a demonstrated ability to bring workers of color, women, justice involved individuals, veterans into successful careers in the workforce. This has led to good jobs for thousands of workers of color, veterans and women, and the union construction workforce is getting more representative every year. People of</p>	<p>Thank you for your comment.</p>



Comment No.	Comment	Response
	<p>color accounted for 61.8 percent of all New York City residents’ union apprenticeships in 2014, far higher than the 36.3 percent share in 1994. Black apprentice participation roughly doubled, rising from 18.3 percent in 1994 to 35.1 percent in 2014. This growing representation has a significant economic impact. A 2017 study found that the “union wage advantage (the percent by which union wages exceed nonunion wages) is larger for construction workers (42.2 percent) than other blue-collar workers, and, among racial and ethnic groups, largest for black (36.1 percent) and Hispanic (52.7 percent) construction workers.”</p> <p>There are cascading beneficial economic and social impacts when workers are paid family-sustaining wages with health and retirement benefits in the communities where the workers live because the workers will spend money in their local communities.</p> <p>There is some additional information that SRWF did not include in its DEIS that we believe would be useful in a more comprehensive understanding of the economic impact of the project and could lead to more intentional measures to create good jobs at the established industry standards.</p>	

**O.6.11. Environmental Justice**

**Table O-20. Responses to Comments on Environmental Justice**

Comment No.	Comment	Response
BOEM-2022-0071-0195-0002	<p>Offshore wind energy is critical to address the climate crisis and can lead to a more just society if done with equity as a core principle. New York State and federal offshore wind energy goals, along with climate science targets, demand that the nascent offshore wind industry in the United States develop quickly. It is imperative in this historical moment that we reach those goals responsibly and equitably by creating beneficial impacts through family-sustaining union careers in every phase of the project including the supply chain. The Congressional policy spelled out in Outer Continental Shelf Lands Act provides that “the outer Continental Shelf is a vital national resource reserve held by the Federal Government for the public, which should be made available for expeditious and orderly development, subject to environmental safeguards, in a manner which is consistent with the maintenance of competition and other national needs.” 43 USC § 1332(3). Congress intended the term “environmental safeguards” to encompass not just the preservation of natural resources, but also the promotion of social and economic conditions of persons whose lives are or may be affected by development projects. Thus, the “environmental impact” studies required by the Act must include analyses of “the environmental impacts on the human, marine, and coastal environments of the outer Continental Shelf.” 1346(a)(1) (emphasis added).</p>	<p>As noted within the COP (Table ES-1 and Section 4.7.1.2) as well as within the Final EIS (Section 3.16.5.5 and Appendix H under Table H-1, APM No. SOC-01), local workers will be hired when feasible to meet labor needs during the three phases of the Project - construction, O&amp;M and decommissioning. Overall, the Project would have economic benefits to many of the port areas that would support the phases of the Project, where, even if local workers were not hired directly by the developer, indirect and induced jobs will be created in the community.</p>

Comment No.	Comment	Response
	<p>See also 43 U.S.C. § 1332(4) (Congress emphasized the “national interest in the effective management of the marine coastal, and human environments.” 43 USC § 1332(4) (emphasis added).</p> <p>Thus, consistent with the Act, BOEM must require bidders for offshore leases to detail how their plans will promote and preserve the welfare of the communities affected by the project for which the lease is sought. These communities include the persons who will work on the project, who will maintain the project, who will produce the materials to be used in the project and the communities proximate to the development, the ports and infrastructure that will support the project. The term “human environment” has a particular meaning. Moreover, Congress defined the term to mean “[t]he physical, social, and economic components, conditions, and factors which interactively determine the state, condition, and quality of living conditions, employment, and health of those affected, directly or indirectly, by activities occurring on the outer Continental Shelf.” 43 U.S. Code § 1331(i). See also, 30 § CFR 585.112. BOEM’s own regulations require prospective lessees to describe in their Site Assessment Plans, GAPs, and Construction Operations Plans information concerning the project’s implications for “[e]mployment existing offshore and coastal infrastructure (including major sources of supplies, services, energy, and water), land use, . . . [and] minority and lower income groups.” 30 CFR §§ 585.611(b), 585.627(7), and 585.646(7). For these</p>	

Comment No.	Comment	Response
	<p>reasons, we urge BOEM to require much more information from SRWF than is currently described in the DEIS. BOEM must be seeking information that will help empower affected environmental justice communities and help close the wealth gap through good union careers. We note that this is precisely what the President has demanded that agencies do with E.E. 14008, §§ 217 and 219.</p>	
<p>BOEM-2022-0071-0205-0023</p>	<p>It should also include any community consultation related to adverse impacts and methods for continued community engagement around the oversight, monitoring, and structuring of mitigation plans including adaptive management strategies.</p>	<p>Outreach and community consultation for the Project were conducted through the NEPA process, which included public scoping meetings and public hearings following the release of the Draft EIS. Recordings and comments from these meetings are available on BOEM Sunrise Wind website: <a href="https://www.boem.gov/renewable-energy/state-activities/sunrise-wind">https://www.boem.gov/renewable-energy/state-activities/sunrise-wind</a>.</p>
<p>BOEM-2022-0071-0232-0018</p>	<p>Twenty-five percent of RI households suffered from food insecurity in 2020 (Ahlquist, 2020). Diminished fishing resources and potentially contaminated catch as secondary impacts of the project may exacerbate food insecurity problems. Many economically challenged families rely on the availability of locally sourced and affordable seafood, such as scup, squid, and a variety of shellfish. Any diminishment of fish stocks will negatively impact these families. Furthermore, Sunrise Wind, as well as the other 6 developments in the area will all impact RI more than any other New England state. These projects burden RI, the poorest of the New England States, disproportionately. Both CT and MA, much richer states per capita, and with more carbon</p>	<p>Food insecurity is an important issue and text has been added to Section 3.17 introducing the food insecurity issue and how environmental justice communities may be impacted.</p> <p>The environmental justice analysis is typically conducted at a lower geographic level to identify and focus on impacts on particular communities, not at the state level. However, the Final EIS has included two new tables within Section 3.14, <i>Commercial Fisheries and For-Hire Recreational Fishing</i> that present revenue exposure related to the Sunrise Wind Project by both port and by state. This provides additional context on potential impacts for different communities.</p>

Comment No.	Comment	Response
	<p>emissions, do not share the burden equally. The BOEM DEIS does not address the relative injustice to the people of RI. Again, this violates the dictum expressed in the Executive order to promote environmental justice, not to burden the most economically depressed state in the region with the entire build-out of offshore wind development.</p>	
<p>BOEM-2022-0071-0065-0022</p>	<p>Sunrise Wind has meaningful potential to create transformative community benefits, job growth, air quality improvements, and economic investments. Communities like Mastic and Shirley, low-income communities on the front lines of climate change, have been vocally supportive of Sunrise Wind and the tangible benefits that this project could bring to the area, not only in terms of economic and community benefits but also in combatting climate change. This project has real public buy-in due to Ørsted fostering the meaningful discussions, regular project updates, and community input that is essential to achieving just transition from fossil fuels to renewable energy. This support was demonstrated during BOEM’s public meetings, and CCE would like to emphasize that BOEM should strongly consider the overwhelming local support for this project when moving forward with the FEIS and Record of Decision.</p>	<p>Thank you for your comment. The community input provided at public meetings and throughout the public comment period on the Draft EIS has been documented within the appendices of the Final EIS, including letters of support. The economic benefits of the Project are also outlined in Section 3.16, <i>Demographics, Employment, and Economics</i>.</p>
<p>BOEM-2022-0071-0195-0003</p>	<p>SRWF can become a model on how to transition responsibly and equitably to a clean energy economy. According to the DEIS, 49 percent of communities affected by the development of the SRWF are considered environmental justice communities, which</p>	<p>Thank you for your comment. Project Labor Agreements (PLAs) and other mechanisms to further document and ensure beneficial impacts from the various phases are being evaluated and implemented by Sunrise Wind.</p>

Comment No.	Comment	Response
	<p>includes communities of color as well as low income communities. CJNY applauds Sunrise Wind for signing a project labor agreement with North American Building Trades Unions to ensure beneficial impacts from the construction phase of the SRWF for environmental justice communities. However, more can be done. Beneficial impacts can be extended to the lifetime of the project, to the operation and maintenance (O&amp;M) phase and throughout the manufacturing supply chain.</p> <p>CJNY supports the development of the SRWF and recommends BOEM require SRWF to provide additional information relating to the environmental justice impacts and demographic, employment, and economic impacts:</p>	

**O.6.12. Finfish, Invertebrates, and Essential Fish Habitat**

**Table O-21. Responses to Comments on Finfish**

Comment No.	Comment	Response
BOEM-2022-0071-0065-0018	<p>In addition to the benefits listed in the DEIS, CCE urges BOEM to consider the potential benefits of offsetting the need for the Northport and Port Jefferson power plants, which are two of the three legacy fossil fuel power plants on Long Island. During the DEIS public meetings, concerns were raised about the impact that the cooling system in the Sunrise Wind project would have on fish populations, particularly Atlantic Cod. According to the DEIS, up to 34,239 individual Atlantic cod larvae could be entrained through Sunrise Wind’s cooling system, which would be the equivalent of 17 adult fish killed per year. In contrast, the Port Jefferson plant is responsible for the entrainment of over 1 billion larvae and impingement of over 75,000 fish. The Northport power plant is responsible for the entrainment of almost 8.5 billion larvae and impingement of over 125,000 fish. It is important for BOEM to note not only the potential adverse impacts of Sunrise Wind’s cooling system, but to compare those impacts to the existing fossil fuel plants that this project would reduce the need for in Suffolk County. Ultimately, the Sunrise Wind cooling system would cause substantially less impact than the “No Action” alternative and would also offset the fossil fuel pollution in Northport and Port Jefferson, leading to improved water quality and air quality in local Long Island communities. CCE asks that BOEM include this benefit in the FEIS.</p>	<p>Thank you for your comment. As of 2021, Northport Power Station consists of four steam turbine units with a nameplate capacity of 387 MW each and one gas turbine unit with a nameplate capacity of 16 MW, for a total of 1,564 MW. Port Jefferson Power Plant has a nameplate capacity that totals 498 MW. Although these are the stated capacities and the annual capacity factors are unknown, it is unlikely that the SRWF could entirely replace these two facilities.</p>

Comment No.	Comment	Response
BOEM-2022-0071-0158-0007	Expand on discussion of potential impacts to the Mid-Atlantic Cold Pool.	Additional information and analysis regarding the Cold Pool were added to the benthic section, 3.7.3, finfish section, 3.10.5, and marine mammal section, 3.11.3.
BOEM-2022-0071-0158-0021	The characterization of the NEFMC Habitat Area of Particular Concern (HAPC) is not accurate and should be corrected in the FEIS. The DEIS characterizes the NEFMC HAPC as “not actually defined by the presence of habitat but by the presence of offshore wind” (page 3-202). Per the Southern New England HAPC Framework document, the HAPC is defined as the presence of cod spawning and complex habitat within areas where offshore wind development is being planned and/or constructed. The spatial extent of this habitat area is limited to offshore wind lease areas, given that impacts associated with offshore wind development are of significant concern to the New England Council.	BOEM has defined the New England Fishery Management Council Habitat Area of Particular Concern as the presence of Atlantic cod spawning and complex habitat within areas where offshore wind development is being planned and or constructed.
BOEM-2022-0071-0158-0030	Entrainment of cooling water at the converter station is discussed on page 3-234. The analysis estimates adult equivalent losses for eight abundant or commercially important fish species. Appendix B (page B-125) includes a brief description for how adult equivalent losses are estimated. The accuracy of these predicted values is uncertain given the fecundity range used to estimate adult losses and the uncertainty levels around these estimates are not provided. It is also not clear why there are only 8 species included in the impact analysis versus the most abundant species found within the plankton data, or how “commercially important” (by revenue? or landings?) and “abundance” are defined.	Please see the Sunrise Wind EFH Assessment and Appendix N1 and N2 of the Sunrise Wind COP for more information on ichthyoplankton and entrainment.



Comment No.	Comment	Response
BOEM-2022-0071-0158-0031	<p>The analysis references proximity to Cox Ledge. The location is referenced as a single point; however, this is misleading, and it should be represented by a polygon. The single point characterization of Cox Ledge does not provide a meaningful description of potential impacts given both cod spawning sites and complex habitats occur in locations that would do not directly overlap this point. Furthermore, the distance from this single point does not account for noise impacts on cod spawning as would otherwise be addressed if the area was represented as a larger polygon. It is possible that cod will not aggregate due to construction activities, and their vocalizations may therefore be reduced. Research by the Massachusetts Department of Marine Fisheries found that relatively minor disturbances from gillnet fishing interrupted the development of cod spawning aggregations (Dean et al. 2012); it is reasonable to expect construction activities may do so as well.</p>	<p>Thank you for your comment. BOEM and NMFS have worked together during the EIS process to address concerns related to Atlantic cod and Atlantic cod spawning. BOEM recognizes that Cox Ledge is not best represented as a single point, however, no polygon data is available for the entirety of Cox Ledge. The Final EIS discussed the impacts construction would have on Atlantic cod and displays data about habitat suitability for spawning Atlantic cod and Atlantic cod observation Data (See Section 3.7, <i>Benthic Resources</i> and 3.10, <i>Finfish</i>). Additionally, please see Appendix H for proposed mitigation measures for Atlantic cod.</p>
BOEM-2022-0071-0229-0010	<p>Finfish, Invertebrates and Essential Fish Habitat: BOEM continues to espouse the illusion that climate change will “reduce reproductive output and increase individual mortality and disease occurrence” contrary to scientific peer reviewed data and utilize this as a “baseline condition” and “regional trend” for all analysis related to the proposed Project. Again, this is a corruption of NEPA and is not a true baseline. Potential future conditions do not serve as baselines. Further, contrary to BOEM’s above conclusion, the fact is that “climate change” is projected to be a positive directional effect for some species, including longfin squid, illex squid, butterfish, black sea bass, and bluefish, among others. According to the DEIS, the Project area has been identified as essential Fish Habitat (EFH) for all of these exact species. Therefore, BOEM cannot insert its own</p>	<p>Text was updated in Section 3.10.1 to clarify the EFH Assessment is under consultation with NMFS. The draft EFH Assessment has been updated to address NMFS comments.</p>

Comment No.	Comment	Response
	<p>conclusion that the baseline of these stocks is declining or projected to decline due to climate change, which serves to downplay Project effects to the species, i.e. “the stocks were declining anyway, and the project would not have impacted that one way or the other”. This assumption is in direct contradiction to peer reviewed scientific literature and climate vulnerability assessments on these stocks. BOEM should instead project that these stocks should be increasing over time if it projects climate change effects to increase over time. Therefore, projected climate change would serve to reduce these increases and cost the fishing community opportunity and revenue. We request that BOEM correct and re-analyze its assumptions, baseline impacts and Alternative impacts relative to this peer- reviewed scientific information. The DEIS states that “BOEM has prepared an EFH assessment for the Project” and relies on this “EFH assessment” for the DEIS.<sup>19</sup> This is problematic, as NMFS is by law the agency designated with the authority to conduct EFH consultations/approvals. It is particularly problematic given the fact that BOEM’s draft EFH assessment provided to NMFS was incomplete and, according to correspondence between the agencies dated October 7, 2022, had NMFS been provided with the updated and correct EFH assessment information consistent with the timeline under FAST 41, it would initiate its EFH consultation no later than February 16, 2023, two days after the public comment period ends for the DEIS.</p> <p>In that correspondence, NMFS states, “The draft EFH assessment is incomplete and requires substantial revisions before consultation can be initiated, as it does not include information necessary for our review. Although we have tried</p>	

Comment No.	Comment	Response
	<p>to provide a comprehensive review of the draft EFH assessment, our review was hampered by the significant deficiencies in the document and the lack of an independent analysis of impacts to EFH.... The provided draft EFH assessment does not include the mandatory elements required for such assessments pursuant to 50 CFR 600.920(e)... Consequently, substantial revisions to the assessment are required before EFH consultation can be initiated. Given the extent of revisions, and supporting analyses, necessary for us to deem the assessment complete, we recommend that you coordinate with us as soon as feasible on the revisions to the assessment.” If BOEM is relying on this incomplete and regulatorily non-conforming EFH document in the DEIS, then all such analysis and conclusions regarding EFH in the DEIS are incorrect and insufficient for the purposes of NEPA. We therefore request that BOEM correct its deficiencies, create a regulatorily conforming EFH document, undergo EFH consultation on marine resources with NMFS, adjust its DEIS EFH section based on that new EFH document, and release a supplemental EIS for public comment to allow for public comment on an accurate under NEPA.</p>	
BOEM-2022-0071-0229-0011	<p>One of the issues not discussed in BOEM’s current EFH document quoted in the DEIS, according to the above, is “site specific analysis (e.g., impingement and entrainment assessment for Atlantic cod eggs and larvae).” We discuss these impacts and our concerns with such impacts in our comments below on “Water Quality/Fisheries Impacts.” We have significant concerns about how the proposed open cooling water intake system for the Project’s offshore converter station (OCS-DC) would affect the recruitment and stock levels of species that our vessels commercially harvest, as three –</p>	<p>Potential Atlantic herring, Atlantic mackerel, and Atlantic butterfish entrainment estimates were projected, and adult equivalent entrainments were evaluated. The parameters used to evaluate the adult equivalent entrainment, such as instantaneous natural mortality and instantaneous fishing mortality rates at varying life stages, were acquired from the EPA Regional Benefits Analysis for the Final Section 316(b) Phase III existing facilities rule (USEPA 2006).</p>

Comment No.	Comment	Response
	<p>Atlantic herring, Atlantic mackerel, and Atlantic butterfish- have been identified by the developer as some of the most affected species by the proposed OCS-DC.</p>	<p>Adult equivalent losses were low for Atlantic Mackerel, less than one fish (0.04), and Atlantic butterfish, 39 fish. Atlantic herring had the highest adult equivalent loss (573 fish). However Atlantic herring are among the most abundant fish in the North Atlantic and projected adult equivalent loss accounts for well less than 1 percent of the current biomass. These results are located in Appendix B.</p>
<p>BOEM-2022-0071-0229-0015</p>	<p>According to a presentation given by the developer at a 2021 NYSERDA FTWG meeting, the developer’s analysis found that “forage” species such as Atlantic herring and Atlantic mackerel would be most susceptible to entrainment of eggs and larvae in the OCS-DC. As both of these commercially important species are currently under rebuilding plans pursuant to the Magnuson Stevens Fishery Conservation and Management Act specifically due to low recruitment/fecundity and not due to overfishing, we request that a detailed analysis on impacts to each species and their projected recovery rate, including resulting fishery impacts, be conducted and published in a supplemental EIS.</p> <p>The developer’s 2021 NYSERDA FTWG presentation also mentions cod, and that the entrainment rates are estimated to be highest in May through December, we also express concerns with the impacts to the cod stock, as this timing overlaps with cod spawning activity. Cod spawning activity begins in November through December, and according to NMFS’ previous correspondence with BOEM regarding adjacent projects which would be applicable to this proposed Project, “impacts to spawning success could have long-term population</p>	<p>Potential Atlantic herring, Atlantic mackerel, and Atlantic butterfish entrainment estimates were projected, and adult equivalent entrainments were evaluated. The parameters used to evaluate the adult equivalent entrainment, such as instantaneous natural mortality and instantaneous fishing mortality rates at varying life stages, were acquired from the EPA Regional Benefits Analysis for the Final Section 316(b) Phase III existing facilities rule (USEPA 2006). Adult equivalent losses were low for Atlantic Mackerel, less than one fish (0.04), and Atlantic butterfish, 39 fish. Atlantic herring had the highest adult equivalent loss (573 fish). However Atlantic herring are among the most abundant fish in the North Atlantic and projected adult equivalent loss accounts for well less than 1 percent of the current biomass. These results are located in Appendix B.</p> <p>Atlantic cod entrainment analysis estimates that a total of up to 34,239 Atlantic cod larvae could</p>

Comment No.	Comment	Response
	<p>impacts for the species” particularly considering “unlike other spawning components, cod in Southern New England have increased in abundance during the last 20 years.” Not all projects, and not all impacts, are created equal. Impacts to the one cod stock component that may be keeping the species going would be far more devastating to the stock than impacts on a less productive or less numerous stock component. We request that BOEM provide estimates of cod spawning and larvae mortality, and resulting species impacts, expected to result from the project and associated entrainment/temperature change due to the OCS-DC and detail its findings in a supplemental EIS made available for public comment.</p>	<p>be entrained on an annual basis which would result in 16.5 equivalent adults. To put these potential entrainment rates in context, one (1) large female Atlantic cod can produce 3 to 9 million eggs annually (See Section 3.10.5.2.2.). The adult equivalent losses for Atlantic cod are estimated to be 16.5 fish lost. These results can be found in Appendix B.</p> <p>The location, design, and operation of the cooling water discharge was selected to minimize the thermal plume size to the extent practicable and preventing thermal plume migration to the surface waters or benthos. For optimal performance of the CWIS, the discharge needs to be sited deep enough that it would be submerged in the 100-year wave event and at a sufficient distance away from the intake pipes to avoid heated effluent being subsequently withdrawn by the Seawater Lift Pump (SWLP). To identify the optimal location for the discharge, the Cornell Mixing Zone Expert System (CORMIX) was used to evaluate the mixing zone associated with multiple discharge locations in the water column. The assessment considered four different seasons using a 2 degrees Fahrenheit (°F) (1 degree Celsius [°C]) temperature differential (ΔT) threshold to delineate the extent of the mixing zone. The optimal location for the discharge was determined to be approximately 40 ft (12 m) below local mean sea level (LMSL).</p>

Comment No.	Comment	Response
		At this optimized location, rapid and complete mixing occurs. The thermal plume would be contained to a distance of 87 ft (27 m) from the outfall and occupy a maximum area of 731 ft <sup>2</sup> (66.9 m <sup>2</sup> ) in a worst-case, slack tide scenario.
BOEM-2022-0071-0229-0016	<p>In Appendix N2 of the COP, the 2022 document prepared by the developer entitled “Ichthyoplankton Entrainment Assessment” conducts some basic analysis of the issues discussed above, but does not fully quantify these impacts. It is a very basic document of only 25 pages that does not translate the findings into any substantial analysis or potential stock impacts. However, the document implies that the species “expected to be the most susceptible to entrainment impacts associated with the OCS-DC include Atlantic herring (<i>Clupea harengus</i>), red hake (<i>Urophycis chuss</i>), Atlantic mackerel (<i>Scomber scombrus</i>), and silver hake (<i>Merluccius bilinearis</i>)” are not commercially important species by immediately following with “the commercially important species whose larvae could be most susceptible to operation of the OCS-DC include yellowtail flounder (<i>Limanda ferruginea</i>), summer flounder (<i>Paralichthys dentatus</i>), and Atlantic butterfish (<i>Peprilus triacanthus</i>)”. This is an entirely faulty assumption, as Atlantic herring, Atlantic mackerel, and silver and red hake all support important commercial fisheries managed by the New England and Mid Atlantic Fishery Management Councils. Seafreeze vessels in particular engage in two of the fisheries- Atlantic herring and Atlantic mackerel- that the developer documents suppose to be non-commercial.</p> <p>If the document is faulty on that very simple subject, we do not</p>	To evaluate the potential entrainment during operational OCS-DC withdrawals, species abundance data was obtained from the NOAA National Centers for Environmental Information (NCEI) electronic database. This database includes data collected by NOAA’s Marine Resource Monitoring, Assessment, and Prediction (MARMAP) program from 1977-1987 and by the Ecosystem Monitoring (EcoMon) program from 1995 through 2017 throughout the North Atlantic region. There is no abundance information available for invertebrates to calculate potential entrainment. The annual Atlantic butterfish entrainment estimate was calculated to be 318,433 larvae (Appendix B). BOEM used this estimate to calculate how many equivalent adult butterfish would be impacted. It was estimated that a total of 39 butterfish could potentially be impacted by the OCS-DC annually (Appendix B).

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	<p>have confidence that it is correct on any more complicated aspects of analysis. Furthermore, it does not include “[l]arger marine invertebrates, such as the Atlantic sea scallop” in the scope of its “analysis” despite the fact that BOEM’s DEIS identifies Atlantic sea scallops as producing \$3.2 million of revenue in the lease area. However, we particularly voice our concerns with the significant number of butterfish larvae projected to be entrained by the OCS-DC according to that document. A table from that document, reproduced below, shows butterfish larval death alone (incorrectly written as “bufferfish”) as driving the entire “Atlantic” species mortality for a good part of the year. As a company whose vessels rely heavily on the butterfish fishery and which are responsible for the majority of all US landings for that stock, we are very concerned. The butterfish stock has recently undergone a research track assessment by the Northeast Fisheries Science Center, and butterfish recruitment (i.e. eggs/larval/young of the year production) was a major focus of that assessment. Any Project induced impacts to that recruitment could have impacts on future stock status and stock assessments. We therefore request that BOEM conduct the necessary analysis to demonstrate quantified impacts to the butterfish stock as a result of the Proposed Action and include such analysis in a supplemental EIS.</p>	
BOEM-2022-0071-0232-0016	<p>Deoxygenation in the lower-level water layer occurs in wind farms (Daewel, 2022). Deoxygenation can cause large-scale fish die-offs. BOEM does not adequately consider the impact of deoxygenation on fisheries. This project is not consistent with the conservation of biodiversity and marine life implied in the Executive Order.</p>	<p>The influence of wind turbines on mixing and turbulence downstream of turbines and within a wind farm is an important area of ongoing investigation. Research on this topic has largely focused on European wind farms and not on the unique characteristics of the Mid-Atlantic Bight.</p>

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		<p>However, research has consistently shown that the wind-wake effect influences stratification, and consequently, water quality, but that the influence is highly site specific. The results from Daewel et al. (2022) are not directly applicable to the SRWF area because that modeling study was based on the North Sea in an area that was known to already contain low dissolved oxygen (i.e., a bathymetric depression in the central North Sea). Further, Daewel et al. (2022) noted that in other areas of the North Sea, the specific hydrodynamic conditions could lead to higher DO levels. While wind farms do likely influence stratification, nutrients, and primary productivity, the actual impacts in the Mid-Atlantic Bight are currently unknown. Additional discussion has been added on this in Section 3.5.3.2 and Section 3.10.5.2.2.</p>
BOEM-2022-0071-0232-0017	<p>The DEIS minimizes the impact of EMFs and only considers local impacts. EMF's could mask the ability for EMF-sensitive species to appreciate the earth's electromagnetic field. Sharks and other long-range migratory species use the earth's magnetic field to navigate. If local EMF's overwhelm the faint alterations in the earth's magnetic field that alert species to their location, then the project could devastate their ability to navigate, find food sources, and procreate. BOEM needs to consider the EMFs from a more global perspective.</p>	<p>Thank you for your comment, more information about EMF effects on aquatic organisms is included in the Final EIS.</p>
BOEM-2022-0071-0232-0032	<p>Cod, the hallmark fishery of New England and the economic engine that propelled the Northeast into prosperity, will potentially suffer extinction under the current plan to develop</p>	<p>A schedule of construction activities at Sunrise Wind, Revolution Wind, and South Fork for the onshore facilities, export cables, offshore</p>



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	<p>the region around Coxes ledge (Dlouhy, 2014). The South Fork, Revolution, and now the Sunrise Wind farms’ footprint will surround this critical marine habitat. Cod spawn in the Cox ledge region and rely on acoustic communication during this ritualized and sensitive behavior (Zemeckis, 2014). Noise from construction and operations of turbines could interfere with their communication and have “population-level impacts on Southern New England Atlantic Cod,” (Chiarella, 2021). The DEIS does not consider the cumulative impact of Revolution Wind, South Fork, and Sunrise Wind, nor does it consider interactions between multiple stressors.</p>	<p>foundations, inter-array cables, WTG installations, and the OSC-DC were compared. There is no overlap between the Sunrise Wind and South Fork construction schedules. There is overlap during the construction of the onshore facilities at both Sunrise Wind and Revolution Wind; however, these are remote from each other and will produce no overlapping impacts. There is also overlay during the construction of the export cables between Sunrise Wind and Revolution Wind, but these cables are approximately 16 mi (25.7 km) apart at their closest point. The proposed construction of the offshore foundations and inter-array cables at both Projects overlap. The timing of the installation of the WTGs or OSC-DC does not coincide with the Projects; however, the installation of offshore foundations and the inter-array cables have similar timing. In some cases, this work could be as close as 2-3 mi (3.2-4.8 km) apart. Results from the sound modeling show that injury from a single strike is limited to 70 meters from a pile for both winter and summer seasons, and injury from prolonged cumulative exposure (over 24 hours) extends as far as 5.8 mi (9.4 km) from the pile during the winter water profile. Modeling indicates that behavioral effects on fish could occur up to 4.7 mi (7.5 km) from the pile source during the winter and 3.2 mi (5.2 km) from the pile source during the summer.</p>

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		<p>Within this area, it is likely that some level of behavioral reaction is expected and could include startle responses or migration out of areas exposed to underwater noise (Hastings and Popper 2005). Mitigation measures such as ramp-up procedures will allow mobile resources to leave the area before full-intensity pile-driving begins. The Project will use bubble curtains, hydro-dampers, and AdBm Helmholtz resonators to reduce noise propagation. The Project is committed to achieving ranges associated with 10 dB of noise attenuation.</p>
BOEM-2022-0071-0242-0011	<p>Select Alternative C-2 to reduce impacts to spawning Atlantic cod habitat;</p>	<p>Thank you for your comment.</p>
BOEM-2022-0071-0242-0066	<p>The Draft EIS for Sunrise Wind provides a reasonably detailed assessment of the anticipated impacts to benthic resources, invertebrates, finfish, and essential fish habitat (EFH). In our scoping comments, we recommended that BOEM provide a specific analysis of impacts to Atlantic cod and other species of concern; we appreciate that BOEM has emphasized the impacts to Atlantic cod throughout the Draft EIS.</p> <p>As discussed below, for the purposes of mitigating impacts to benthic resources, finfish, invertebrates, and EFH, we recommend that BOEM select Alternative C: Fisheries Habitat Impact Minimization Alternative (Habitat Alternative), and specifically Alternative C-2. The Sunrise Wind Farm Project overlaps in part with Cox Ledge, which contains important complex habitat and Atlantic cod spawning habitat. Because Alternative C-2 would avoid, minimize, and mitigate impacts to</p>	<p>Thank you for your comment. BOEM is in consultation with NMFS through the EFH and Biological Assessments, as well as in communication for the development of alternatives to reduce impacts to Atlantic cod habitat.</p>

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	<p>such habitats—including impacts from the presence of structures, noise, anchoring and cable emplacement, etc.—more so than the other alternatives, BOEM should select this option. We also urge BOEM to require Sunrise Wind to undertake several mitigation and monitoring measures identified in the Draft EIS.</p> <p>We note that the Magnuson-Stevens Fishery Conservation and Management Act requires federal agencies, such as BOEM, to consult with NMFS on activities that could adversely affect EFH. NOAA defines EFH as “those waters and substrate necessary to fish for spawning, breeding, feeding or growth to maturity.” The Sunrise Wind Farm and the Sunrise Wind Export Cable (SRWEC) overlap with EFH designated for many species, including several overfished fish populations such as Atlantic cod, ocean pout, winter flounder, witch flounder, and yellowtail flounder. There are also several fish species listed under the ESA that are present in the Project Area, including giant manta ray, Atlantic sturgeon, Atlantic salmon, oceanic whitetip shark, and shortnose sturgeon.</p> <p>NOAA also identifies habitat areas of particular concern (HAPCs), which are high priority areas for conservation, management, or research because the areas are rare, sensitive, stressed by development, or important to ecosystem function. HAPCs are discrete subsets of EFH that provide important ecological functions or are especially vulnerable to degradation. While HAPCs are recognized due to their importance for conservation, management, and research, designation as an HAPC does not confer any specific habitat protection; however,</p>	

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	<p>regional management councils may take HAPCs into consideration when minimizing adverse impacts from fishing.</p>	
<p>BOEM-2022-0071-0242-0067</p>	<p>The proposed SRWEC will cross areas that have been designated HAPC for adult and juvenile summer flounder in New York state waters. The Mid-Atlantic Fishery Management Council has identified HAPC for summer flounder as “all native species of macroalgae, seagrasses, and freshwater and tidal macrophytes in any size bed, as well as loose aggregations, within adult and juvenile summer flounder EFH.”</p> <p>Additionally, in July 2022, NEFMC approved a proposed HAPC that overlaps offshore wind-energy lease sites in southern New England, including Sunrise Wind. NEFMC selected this area “to highlight its concerns over potential adverse impacts from offshore wind development on: (1) sensitive hard-bottom habitats; and (2) cod spawning activity.” In addition to Atlantic cod, this proposed HAPC emphasizes the importance of complex habitat on the egg, juvenile, and adult life stages of species ranging from herring and scallops to monkfish, skates, winter flounder, and red hake.</p>	<p>Thank you for this comment, this information is included in the EIS and EFH.</p>
<p>BOEM-2022-0071-0242-0070</p>	<p>The Draft EIS observes that an active Atlantic cod spawning ground has been identified in a broad geographical area that includes Cox Ledge and surrounding areas. BOEM is currently conducting a telemetry study of Atlantic cod in the area of Cox Ledge to better understand cod use of the habitats in the area. Two years of data have been collected to date. Although there are not yet formal reports analyzing the data, Atlantic cod have been detected in the Northwest corner of the Sunrise Wind</p>	<p>Thank you for your comment. Data from these studies have been used to determine Alternative C-3 to reduce impacts on Atlantic cod habitat. Cumulative impacts on the Atlantic cod fishery are discussed in Chapter 3.</p>

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	<p>Project Area. The Draft EIS explains that because of Atlantic cod spawning site fidelity, habitat alteration and seafloor disturbance from offshore construction activities could result in a loss of spawning habitat for Atlantic cod. However, because of the availability of similar surrounding habitat, BOEM expects that project activities will not result in measurable impacts on spawning Atlantic cod. According to BOEM, “non-lethal impacts on EFH from seafloor preparation activities are expected to be short-term, as any effects would cease shortly after seafloor preparation is completed in a given area and only a small portion of the available habitat in the area would be disturbed.”</p> <p>While BOEM assumes that any impacts to spawning cod resulting from habitat disruption from construction will be low because of the availability of similar surrounding habitat, there are planned offshore wind projects in other areas that overlap Cox Ledge including the South Fork Wind and Revolution Wind projects. In the Final EIS, BOEM should assess how the cumulative impacts from the construction activities for these three projects will affect the spawning cod habitat and reproductively isolated spawning cod stock in the northwestern portion of the planned Sunrise Wind Project Area and elsewhere on Cox Ledge. Additionally, BOEM should revise its conclusions on the effects of construction activities on Atlantic cod to include the results from the final report on the Atlantic cod telemetry study. Further, if necessary, BOEM should adjust its recommendations on EFH and benthic resources mitigation measures to incorporate these revisions.</p>	

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<p>BOEM-2022-0071-0242-0071</p>	<p>The presence of WTG structures could also cause hydrodynamic effects. Hydrodynamic effects occur when structures cause changes in current speed, wave height, and sediment transport.</p> <p>The Draft EIS notes that as currents flow by offshore wind structures, it can leave wakes in the immediate area, which can “increase the potential mixing of the bottom and surface layers of the water column with the potential to impact stratification, nutrient circulation, and possible larval dispersal.” It also finds that hydrodynamic turbulence resulting from offshore wind development is a topic of emerging concern because of potential effects on the Mid-Atlantic Bight cold pool. The Draft EIS explains that the cold pool “is a mass of relatively cool water that forms in the spring and is maintained through the summer by stratification” and that the “cold pool supports a diversity of fish and other marine species that are usually found farther north but thrive in the cooler water it provides.” It observes that several lease areas within the Rhode Island/Massachusetts Wind Energy Areas are located on the approximate northern boundary of the cold pool. The Draft EIS recognizes that the potential effects of offshore wind development on the cold pool is a topic of emerging interest and ongoing research and that potential changes to cold pool dynamics resulting from offshore wind activities, “should they occur, could conceivably result in changes in benthic habitat suitability and fish community structure.” In the Final EIS, BOEM should attempt to quantify the impacts to the cold pool from WTG structures and include such impacts in its impact level ratings.</p> <p>Unlike the Revolution Wind Draft EIS, the Sunrise Wind Draft</p>	<p>Further discussion on hydrodynamic effects on finfish and EFH is discussed in Section 3.10.5.2.2 of the Final EIS.</p>

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	<p>EIS provides only limited analysis of the potential effects of hydrodynamic impacts on spawning fish populations in the vicinity of the proposed project’s infrastructure. For example, the Revolution Wind Draft EIS notes that hydrodynamic effects caused by the presence of WTG structures could alter dispersal patterns for pelagic and demersal eggs and larvae, which could influence the productivity of some spawning fish populations. The Revolution Wind Draft EIS also observes that WTG structures have the potential to alter stratification patterns that support the base of the marine food web and that these changes in circulation patterns have the potential to negatively affect the reproductive success of numerous fish and invertebrate species. The Revolution Wind Draft EIS further recognizes that there is a concern that hydrodynamic impacts could potentially lead to negative population-level effects on the reproductively isolated cod spawning stock on and around Cox Ledge, but that population-scale impacts are unlikely.</p> <p>The Final EIS for Sunrise Wind should provide similar analysis on the impacts to spawning fish populations from hydrodynamic turbulence. Moreover, in the Final EIS, BOEM must provide more detailed analysis of the impacts from hydrodynamic effects on fish stocks that spawn in specific locations of the Sunrise Wind Farm, and particularly the reproductively isolated Atlantic cod spawning stock in and around Cox Ledge.</p>	
BOEM-2022-0071-0242-0072	Underwater noise from anthropogenic sources, including from offshore wind development, can have a variety of effects on marine fishes, including behavioral impacts, masking of communication or other biologically-important sounds, physiological changes, hearing loss, and physical injuries.	A number of mitigation initiatives will be deployed during pile driving to address noise impacts during pile driving on Atlantic cod spawning. Ramp up procedures during pile-driving activities will be used, allowing mobile

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	<p>Noise impacts to fish vary depending on the type of fish species. The hearing specialist group of fish, which includes Atlantic cod, hake, and black sea bass, rely on sound for communication and other behaviors and, thus, are more susceptible to noise impacts. Atlantic cod, in particular, have relatively strong hearing abilities, over a frequency range that overlaps with many forms of anthropogenic noise, including pile-driving, vessels, and wind turbine operation. Moreover, as recognized by BOEM, “[n]oise impacts could be greater if they occur in important spawning habitat, occur during peak spawning periods, and/or result in reduced reproductive success in one or more spawning seasons, which could result in long-term effects to populations if one or more year classes suffer suppressed recruitment.”</p> <p>There are multiple studies pointing to reasons for concern over possible impacts of wind farm-related noise on cod spawning. Experimental work exposing captive adult cod during the spawning period to playback of noise over frequencies typical of shipping and wind turbine operation has shown negative impacts on egg production and fertilization rates in adult cod, reducing viable embryos by 50 percent. Playback of recordings of ship noise has shown impacts on growth and body shape in larval cod as well as increased susceptibility to predators and hence implications for compromised survival. Spawning behavior in the wild is known to be generally sensitive to disruption: fishing activity on spawning grounds, for instance, has been shown to disrupt spawning even for those fish not captured.</p>	<p>resources to leave the area before full-intensity pile-driving begins. The Project will use bubble curtains, hydro-dampers, AdBm, Helmholtz resonators to reduce noise propagation during pile driving. The Project is committed to achieving ranges associated with 10 dB of noise attenuation. Mitigation zones established for all species will be applied, depending on the season in which work is performed: summer (May-November) or winter (December-April). No pile installation will occur from 01 January to 30 April. An Atlantic Cod Spawning Monitoring Plan will be developed to monitor for Atlantic cod aggregations that are indicative of spawning behavior between November 1 and March 30 of each year. The objective of the plan is to detect Atlantic cod aggregations and avoid or minimize the above-listed activities in any area with aggregations of Atlantic cod indicative of spawning behavior. The plan will include details on detection thresholds (e.g., density and location) of spawning Atlantic cod aggregations that would trigger the adaptive management of activities.</p>



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BOEM-2022-0071-0242-0073	<p>In addition to these potential direct impacts on cod spawning-related physiology and behavior, noise could lead to interference of cod acoustic communication. Cod produce vocalizations (grunts) during spawning that overlap in frequency with anthropogenic noise. Measurements of cod grunts along with shipping and ambient sound levels made during spawning periods in the vicinity of Stellwagen Bank suggest that the distances over which cod can detect grunts might be reduced due to masking by vessel noise.<sup>280</sup> Cod grunts are thought to serve a role in courtship and attracting mates, and interference of this communication by wind farm-related noise could potentially compromise spawning success and hence population health.</p> <p>Studies relating to European wind farms have suggested that operational noise from wind turbines might be detectable by cod to distances of 4-13 km. In one study, tracking of small numbers of tagged cod at a Belgian wind farm during periods when individual wind turbines were out of operation relative to periods before and after suggested no evidence of behavioral avoidance. In contrast, another study observed an increase in catchability of cod within 100 m of a wind turbine when it was not operating. Overall, impacts within the range of noise detectability might more likely relate to masking of cod calls and reduction of communication ranges than to avoidance or similar behavior.</p> <p>The Draft EIS’s conclusions on the likely noise impacts on Atlantic cod and other species from the Sunrise Wind project are largely consistent with these studies. The Draft EIS observes</p>	<p>A number of mitigation initiatives will be deployed during pile driving to address noise impacts during pile driving on Atlantic cod spawning. Ramp up procedures during pile-driving activities will be used, allowing mobile resources to leave the area before full-intensity pile-driving begins. The Project will use bubble curtains, hydro-dampers, AdBm, Helmholtz resonators to reduce noise propagation during pile driving. The Project is committed to achieving ranges associated with 10 dB of noise attenuation. Mitigation zones have been established for all species and would be applied depending on the season in which work is performed: summer (May-November) or winter (December-April). No pile installation will occur from 01 January to 30 April. An Atlantic Cod Spawning Monitoring Plan will be developed to monitor for Atlantic cod aggregations that are indicative of spawning behavior between November 1 and March 30 of each year. The objective of the plan is to detect Atlantic cod aggregations and avoid or minimize the above-listed activities in any area with aggregations of Atlantic cod indicative of spawning behavior. The plan will include details on detection thresholds (e.g., density and location) of spawning Atlantic cod aggregations that would trigger the adaptive management of activities.</p>

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	<p>that “Atlantic cod, hake, and black sea bass belong to the hearing specialist group and rely on sound for communication and other important behaviors,” including spawning. It explains that pile driving and other noise impacts can result in acoustic masking for Atlantic cod, whereby cod “fail to detect biologically important acoustic cues, such as spawning communications.” According to the Draft EIS, noise impacts to Atlantic cod from impact pile driving “could be greater if pile driving occurs in spawning habitat, occurs during peak spawning periods, and/or results in reduced reproductive success in one or more spawning seasons, which could result in long-term effects to populations if one or more-year classes suffers suppressed recruitment.” Moreover, because of Atlantic cod spawning site fidelity, “[a]lteration of the ambient noise environment during evening spawning periods could interfere with communication and alter behavior in ways that could disrupt localized cod spawning aggregations.” BOEM concludes that prohibiting pile driving from January 1 to April 30 to protect North Atlantic right whales will also protect spawning Atlantic cod, which primarily spawn from December to May in southern New England .</p> <p>BOEM has not conducted a separate analysis on the extent to which either Habitat Alternative would reduce noise impacts to Atlantic cod, and specifically spawning cod. In the Final EIS, BOEM should improve its analysis of the extent to which the two Habitat Alternatives would specifically reduce noise impacts to Atlantic cod spawning stocks in and around Cox Ledge, and use this to advise its decision-making BOEM should also incorporate data from the ongoing cod telemetry study</p>	

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	<p>into this analysis. The research on noise impacts on cod spawning, discussed above, suggests that avoiding the construction and operations of WTGs in Cox Ledge, and the noise associated with such activities, through selection of either Habitat Alternative, has the potential to significantly reduce impacts to the cod spawning population in that area.</p>	
<p>BOEM-2022-0071-0242-0075</p>	<p>Sunrise Wind’s COP proposes that the offshore AC to DC conversion station utilize a cooling system that is open loop, which will have a design intake flow of approximately 8.1 million gallons per day. The heated effluent is subsequently discharged back into the receiving waters. Open loop cooling systems of this kind have long been shown to have negative impacts from entrainment and impingement of marine life, particularly eggs, larvae, young juvenile fish, and invertebrates with planktonic life stages. Moreover, the discharge of warmer water into the ocean can negatively impact microorganisms and finfish and higher energy orders above such species.</p> <p>In comments on the scoping for Sunrise Wind Farm, we requested that in order to minimize impacts to EFH and finfish, BOEM should require Sunrise Wind to redesign the converter station to use a closed loop cooling system. BOEM, however, dismisses this potential alternative, explaining in the Draft EIS that a closed loop system for Sunrise Wind “is not technically and economically feasible or practical.” Further, although BOEM acknowledges in the Draft EIS that Sunrise Wind’s proposed open loop cooling system could result in the entrainment and impingement of ichthyoplankton and juvenile and adult fish, BOEM did not quantify such impacts. BOEM also did not quantify the impacts resulting from the heated effluent</p>	<p>Mitigation measures to reduce impacts to finfish and EFH from the converter station were included in the design of the facility. The OCS-DC was designed to have a through screen velocity of 0.43 ft/s (0.13 m/s is below the threshold required for new facilities defined at §125.84(c)) and is therefore protective against the impingement of juvenile and adult life stages of finfish. Accordingly, only the species with egg or larval life stages present in the vicinity of the OCS-DC would be susceptible to entrainment. The water depth of the intake pipe openings approximately 30 ft (10 m) above the seafloor was selected to minimize entrainment of ichthyoplankton and to take advantage of the cooler water temperatures found at depth to minimize water withdrawal volumes. The intake pipe will be equipped with a VFD. The VFD technology allows the cooling water intake of the OCS-DC to be optimized as it relates to minimizing water withdrawals as power output and source water temperature varies temporally. Each of the intake pipes would have two Coarse Filters consisting of a Super Duplex Stainless Steel</p>

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	<p>that is discharged into the waters surrounding the conversion station.</p> <p>In the Final EIS, BOEM should provide a more detailed explanation for its conclusion that a closed loop cooling system is not technically and economically feasible or practical. BOEM should also improve its analysis of the entrainment and impingement impacts resulting from cooling water intake for the proposed open loop cooling system, as well as the impacts resulting from heated effluent discharge, and quantify such impacts. Finally, BOEM should assess the extent to which mitigation measures can be developed to mitigate any impacts from the open loop cooling system.</p>	<p>vertical housing that encases a series of three banks of wedge wire filter tubes designed to filter suspended solids and organisms larger than 500 microns. The HZI is highly localized and does not extend within 15 ft (5 m) of the pre-installation seafloor grade or 98 ft (30 m) of the surface. Only eggs and larvae that enter the localized HZI would be susceptible to entrainment; species whose ichthyoplankton are buoyant or benthic would not be affected. The hydrothermal modeling completed for the NPDES Permit estimated that the thermal plume would not extend beyond the regulatory mixing zone of 330 ft (100 m) as defined by the Ocean Discharge Criteria in the NPDES regulations; thus, effects on water quality beyond the regulatory mixing zone are not anticipated.</p>
BOEM-2022-0071-0242-0076	<p>Alternative C-2 would result in reduced impacts to complex benthic habitats, the EFH that overlap with such areas, and finfish, and we urge BOEM to select this alternative to mitigate impacts to these resources.</p> <p>Under Alternative C-1, 8 WTGs would be excluded from development in a contiguous area of complex habitat in the northwestern corner of the Sunrise Wind Farm, which has the highest density of boulders and where preliminary data suggests the presence of Atlantic cod spawning activity. Alternative C-2 would not only exclude from development the locations of these 8 WTGs, but also relocate an additional 12 WTGs from the northwestern portion of the Sunrise Wind farm</p>	<p>Results of surveys on the eastern side were not available when Draft EIS was written, Alternative C-3 was developed and results from the eastern surveys are included in the Final EIS.</p>

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	<p>to the eastern side of the lease area.</p> <p>BOEM finds that both Alternative C-1 and C-2 would reduce the total area of complex habitat disturbed by WTGs and the interarray cable. Whereas under the proposed action, 43 percent of the acreage experiencing long-term impacts from the Sunrise Wind Farm would be complex habitat, Alternatives C-1 and C-2 would reduce the acreage of complex habitat affected to 36 percent and 24 percent, respectively. The Draft EIS finds that relocating up to 20 WTG positions from areas of higher complexity habitat to areas of soft bottom under Alternative C-2 “could reduce the overall adverse impacts of the WTG array on benthic resources.” The Draft EIS also concludes Alternative C-2 could potentially result in reduced overall impacts to finfish, invertebrates, and EFH due to the change in layout aimed at reducing the number of WTGs located in presumed Atlantic cod spawning locations and complex bottom habitats. Whereas under the Proposed Action, impacts to finfish, invertebrates, and EFH would range from negligible to moderate, BOEM finds that under Alternative C-2 (or Alternative C1), impact levels would decrease and range from negligible to minor.</p> <p>Alternative C-2 would avoid, minimize, and mitigate impacts to complex habitats resulting from the presence of structures to a greater extent than the Proposed Action, which in turn would reduce the impacts from the presence of structures to habitat-forming invertebrates and finfish, including the geographically isolated Atlantic cod spawning stock on Cox Ledge. The fact that complex habitats may take a decade or longer to recover from</p>	

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	<p>offshore wind development activities provides additional justification for selecting Alternative C. Further, although BOEM has not studied the extent to which Alternative C would reduce noise impacts to Atlantic cod, research suggests that siting fewer WTGs in the complex habitats that overlap with Cox Ledge would reduce construction and operation noise impacts on spawning cod populations when compared to the Proposed Action. Accordingly, BOEM should select Alternative C-2.</p>	
<p>BOEM-2022-0071-0242-0078</p>	<p>For the Revolution Wind project, BOEM proposes sound field verification and passive acoustic monitoring for finfish and EFH. The sound field verification would require Revolution Wind to submit an acoustic monitoring and sound field verification plan at least 90 days prior to initiating underwater noise producing construction activities, which would contribute to improving understanding of the nature and duration of noise impacts and provide the information necessary to ensure that effects do not exceed certain levels. Additionally, BOEM proposes that Revolution Wind prepare a passive acoustic monitoring plan to record ambient noise and fish vocalizations within the Revolution Wind Farm. The plan would include the deployment of moored or autonomous passive acoustic devices capable of detecting the vocalizations of spawning cod, and potentially other species. Passive acoustic monitoring devices would be implemented prior to and during the construction period and continue for at least three years of project operations once construction is completed.</p> <p>Inexplicably, similar acoustic monitoring measures are not proposed for the Sunrise Wind project. As these measures will help improve our understanding of the impacts of offshore</p>	<p>Please see Sunrise Wind EFH Assessment, APMs for Construction and Operation of the SRWF, SRWEC-OCS, and SRWEC-NYS Project Components, specifically the "PAM for impact pile driving." The SRWF would include: 4-hour PAM operator rotations for 24-hour operation vessels, deployment of PAM systems outside the perimeter of the shutdown zone, and a PAM operator on duty to conduct acoustic monitoring. Acoustic monitoring will occur in coordination with the visual PSOs during all pre-start clearance periods, piling, and post-piling monitoring periods. Passive acoustic monitoring will include and extend beyond the largest shutdown zone for low- and mid-frequency cetaceans, which are all protective of EFH and EFH-designated species.</p>

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	<p>wind construction and operations, including noise impacts, on EFH and finfish species, BOEM should require these monitoring measures. In addition to these monitoring efforts, because the area of the Sunrise Wind Farm that overlaps with Cox ledge is an important Atlantic cod spawning habitat, BOEM should conduct Atlantic cod spawning surveys in the area of the Sunrise Wind Farm to further our understanding of the impacts of offshore wind on cod spawning, and inform the development of adaptive management mitigation measures, if needed.</p> <p>Additionally, for Revolution Wind, BOEM states that, based on acoustic monitoring and sound field verification, it could require additional adaptive measures to avoid disrupting spawning aggregations of Atlantic cod. It suggests that based on the acoustic monitoring, it may require Revolution Wind to “restrict pile-driving activity during the cod spawning season to avoid and minimize adverse impacts on Atlantic cod spawning and reduce broader population level-effects,” but that this adaptive approach “has not been fully developed and the avoidance and minimization measures have not been implemented and tested.” Similarly, for Sunrise Wind, if based on monitoring BOEM determines that time-of-year restrictions will reduce impacts to cod spawning, BOEM should require Sunrise Wind to implement such adaptive restrictions on construction activities.</p> <p>Beyond the monitoring measures already contemplated, BOEM, in consultation with Rhode Island, Massachusetts, and New York fishery managers and NMFS, should determine whether other monitoring measures are needed to document and</p>	

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	determine impacts to benthic habitat, invertebrates, finfish, and EFH from the Sunrise Wind project.	
BOEM-2022-0071-0248-0002	RODA is a coalition of more than 200 fishery-dependent companies, associations, and community members committed to improving the compatibility of new offshore development with their businesses. Members of our coalition operate in federal and state waters of the New England, Mid-Atlantic, and Pacific coasts.	Thank you for your comment.
BOEM-2022-0071-0248-0044	The DEIS indicates minor impacts resulting from entrainment. This is based on estimates for egg and larval species. “Even though over 1 million of the abundant Atlantic herring eggs and larvae are estimated to be entrained at the OCS-DC that only equates to less than 600 adult Atlantic herring.” It bears noting the population of Atlantic Herring is currently overfished and the stock is under a rebuilding plan. The most recent estimates of stock biomass from NOAA stock assessments show a declining trend: 2018 - 141,473 metric tons, 2020 - 77,883 mt, and 2022 - 39,091 mt <sup>35</sup> . The entrainment of over 1 million Atlantic herring eggs during a time the stock is under a rebuilding plan and biomass is showing a steady downward trajectory, seems inappropriate. Even if we assume the DEIS is correct when it estimates the loss of 600 adult Atlantic herring, those 600 adult herring will be integral to rebuilding of the stock. To the extent the diet of the adult Atlantic herring influences its fecundity, potential impacts on zooplankton and other food sources needs to be accounted for as well. We recommend additional analysis on entrainment potential and impacts to ALL stocks which may be entrained. Analysis of stock level impacts resulting from entrainment can then inform potential fishery and ecosystem impacts from those impacts.	Based on equivalent adult estimates of Atlantic herring, stock level impacts are not expected from entrainment.



Comment No.	Comment	Response
BOEM-2022-0071-0251-0003	<p>An open cooling water intake system, such as the CWIS system slated for Sunrise Wind, has no place in the ocean. In NYS, in 2011, open water-cooling systems were banned for new builds on New York State land by then DEC Commissioner Joe Martens. 8.1 mil gals per day released as 90 degree effluent with only a 500 micron mesh to protect fish eggs and larvae is not acceptable under any circumstances. There isn't any analysis for the project other than what was done by a third party consultant, which is unacceptable. If a project of this nature is not allowed for new builds in New York State, it should not be allowed a loophole to sully the ocean, kill millions perhaps billions of fish yearly, and then be allowed to plug in to New York State. This entire CWIS must be evaluated by BOEM with regard to fish stocks, fish recruitment, losses of young of the year and its effect on Atlantic Cod stocks, specifically the DPS of Southern New England</p>	<p>Mitigation measures to reduce impacts to finfish and EFH from the converter station were included in the design of the facility. The OCS-DC was designed to have a through screen velocity of 0.43 ft/s (0.13 m/s) which is below the threshold required for new facilities defined at §125.84(c) and is therefore protective against the impingement of juvenile and adult life stages of finfish. Accordingly, only the species with egg or larval life stages present in the vicinity of the OCS-DC would be susceptible to entrainment. The water depth of the intake pipe openings approximately 30 ft (10 m) above the seafloor was selected to minimize entrainment of ichthyoplankton and to take advantage of the cooler water temperatures found at depth to minimize water withdrawal volumes. The intake pipe will be equipped with a VFD. The VFD technology allows the cooling water intake of the OCS-DC to be optimized as it relates to minimizing water withdrawals as power output and source water temperature vary temporally. Each of the intake pipes would have two coarse filters consisting of a Super Duplex Stainless Steel vertical housing that encases a series of three banks of wedge wire filter tubes designed to filter suspended solids and organisms larger than 500 microns. The HZI is highly localized and does not extend within 15 ft (5 m) of the pre-installation seafloor grade or 98 ft (30 m) of the surface. Only</p>

Comment No.	Comment	Response
		eggs and larvae that enter the localized HZI would be susceptible to entrainment; species whose ichthyoplankton are buoyant or benthic would not be affected.
BOEM-2022-0071-0283-0001	<p>Thank you. My name is Meghan Lapp. I represent Seafreeze. My name is spelled M- E- G- H- A- N L- A- P- P. Thank you very much.</p> <p>I want to raise some very significant concerns that we in the fishing industry have with this project, particularly with the open- water cooling system that the substation is supposed to have. Open water- cooling systems are illegal in New York state waters. So, it's kind of troubling that New York State would actually approve that type of open water- cooling system. In federal waters, it is supposed to emit 8.1 million gallons a day of 90-degree effluent. It will -- it is situated in an area that is very important for cod and cod spawning as was detailed by the Habitat Minimization Alternatives but an open water- cooling system will suck in the water where the cod larva and the cod eggs are located, it will cook them and then it will spit them out dead. This is going to have very, very significant impacts on the cod population on Southern New England. It could cause a stock collapse.</p> <p>We do not support having any open water- cooling systems allowed in any substation on this project. And I will reserve the rest of my comments for written comments.</p> <p>Thank you.</p>	<p>Thank you for your comment. The open water cooling system is discussed in regards to Finfish in Section 3.10.5.2.2 in the Final EIS. More information has been added to analyze impacts to Atlantic cod.</p>

Comment No.	Comment	Response
BOEM-2022-0071-0283-0012	<p>Hi, Adrienne Esposito, A- D- R- I- E- N- N- E E- S- P- O- S- I- T- O, Citizens Campaign for the Environment. And thank you for the opportunity to speak.</p> <p>I think that one thing -- and I know I testified a couple of days ago on the first hearing, but I' m going to add to my comments - - is it would be great for the Draft EIS to include what happens to our finfish and shellfish industry if we don' t have offshore wind. We've heard a lot of discussions today and rightfully so, about open- loop systems and closed- loop systems, but I think we fail to remember that we currently have fossil fuel- based power plants using open- loop systems. And so, it would be important, I think, for the DEIS to juxtapose next to the system that the wind farm would use, to the systems that our power plants are currently using.</p> <p>So, for instance, I think many people are unaware about how much entrainment and impingement of larval for shellfish and finfish as well as juvenile shellfish and finfish is actually occurring right now as we speak. For instance, the EF Barrett power plant on the south shore, and this is national grid's own data, they own the owners and the operators of these power plants, their own data shows that there's 906 million larvae that are dead or caused to be deceased by entrainment each year, as well as 160,000 that suffer impingement. That's in one power plant. Port Jefferson power plant, it' s 1 billion with a B, larval and shellfish, and finfish that go through entrainment and an additional 76,000 that suffer from impingement. And last but absolutely not least, the North Port power plant, which is the largest power plant, is 8.43 billion with a B, shellfish and larvae that are impinged from the open loop system that this power plant uses as well as an additional 127,100 that suffer from</p>	<p>Thank you for your comment. Since these projects are not related to the Sunrise Wind Project, we cannot make direct comparisons in the EIS but we appreciate you pointing this out in the public commenting process.</p>

Comment No.	Comment	Response
	<p>impingement. All of those larvae and juveniles, whether it's shellfish, lobster, winter flounder, cod, whatever it is, are killed from these power plants. Many of us believe that these power plants are sadly and unfortunately playing a role in the reduction of finfish and shellfish populations throughout Long Island and our Atlantic waterways.</p> <p>Since we know that shellfish and finfish utilize estuaries as nursery and breeding grounds, when these shellfish and larvae are sucked up into these open loop systems and killed, we know that the populations are decreased.</p> <p>So again, I think the DEIS in order to give a holistic comprehensive view, needs to illustrate what would happen with an open- loop system with offshore wind, with a comparable open- loop system with one of these power plants. And I think we' re going to see that all energy infrastructure has some impact on our environment, but it's up to us to choose the ones that have the least impact on our environment, and that's offshore wind.</p> <p>And that's one of the many reasons why environmental groups are supporting Sunrise Wind and transitioning away from dirty fossil fuels. It's not only about air emissions. It's not only about climate change. It's also about preserving fin fishing and the quality of our estuaries and waterways to preserve our maritime history, help fishermen, and the quality of water within those water bodies.</p> <p>Thank you for the opportunity to comment.</p>	

**O.6.13. Land Use and Coastal Infrastructure**

**Table O-22. Responses to Comments on Land Use and Coastal Infrastructure**

Comment No.	Comment	Response
BOEM-2022-0071-0257-0006	The DEIS characterizes the use of a Highway ROW as a “previously disturbed and developed area” in the absence of environmental impacts from a utility installation along an “existing roadway” and transportation ROWs. (See DEIS at pp. 2-10, 3-179, 3-186, 3-364, 3-467, 3-479, and 3-595). The installation review procedures of a utility facility within the controlled access ROW are set forth in 17 NYCRR § 131.6 and each request is reviewed in a case-by case basis. The evaluation includes impacts to transportation safety impacts and the potential to compromise infrastructure integrity. <sup>3</sup>	Upon review of the Environmental Management and Construction Plan, pursuant to Article VII (16 NYCRR 85–88), which was approved in June 2023, BOEM has confirmed that onshore construction related impacts for the transmission cable and interconnection corridors will be limited to previously disturbed areas, to the extent practicable.
BOEM-2022-0071-0257-0008	The onshore linear alignment as described in the DEIS at pages 3-528 and 3-631 describes the onshore construction activities as having impacts to traffic and “vehicular traffic associated with construction activities would be comparable to typical roadway or utility construction work”. This statement is unclear as to impacts on traffic safety and does not make a distinction between traffic impacts of construction on a highly congested region, such as Long Island and a sparsely populated, rural area. The DEIS at page 3-632 incorporates by reference the Environmental Management and Construction Plan (EM&CP) (from the NYS Article VII process) and a future MPT, thus acknowledging traffic impacts. NYSDOT will require a	Text in Section 3.18.5.1.1 (previously Section 3.6.5.5.1.1 of the Draft EIS) of the EIS has been revised to state “Vehicular traffic associated with construction activities would be comparable to typical roadway or utility construction work that would occur in a congested region,” to make the distinction between traffic impacts in a congested region compared to a rural area. BOEM understands that NYSDOT will require a MPT submission that will evaluate the impacts to traffic safety for the Project.

Comment No.	Comment	Response
	MPT submission and will evaluate the impacts to traffic safety.	
BOEM-2022-0071-0257-0009	<p>Alternate routing and specifically routes that do not involve longitudinal occupation of federal-aid controlled access highways, must be fully vetted as part of an exception request to NYSDOT’s Utility Accommodation Plan. FHWA regulations at 23 CFR § 771.105(c) require “[a]lternative courses of action be evaluated and decisions be made in the best overall public interest based upon a balanced consideration of the need for safe and efficient transportation; of the social, economic, and environmental impacts of the proposed transportation improvement; and of national, State, and local environmental protection goals.” The DEIS at page 2-42 (Table 2.2-1, “Alternatives that were Considered for Analysis in this Draft EIS but Not Analyzed”) dismisses onshore transmission alternatives and describes the basis for the dismissal as a reference to DEIS Appendix P – USACE Summary Table of Alternatives Analysis. The DEIS Appendix P summation of the USACE (U.S. Army Corps of Engineers) review and issuance of permits for the onshore route of the utility facility is not instructive to determine viable alternatives alignments to the longitudinal installation of a utility facility within a controlled access Highway ROW. The DEIS at page 2-42 acknowledges that onshore transmission cable route alternatives were not identified “that would further reduce or avoid impacts to land use, sensitive environmental habitat, and cultural resources.” The DEIS selection of the preferred alternative as “optimal” does</p>	<p>Sunrise Wind and NYSDOT have been working together since January of 2020 to ensure route selection, design specifications, and installation timelines for the Project are consistent with NYSDOT requirements and minimize impacts to the extent possible during construction and operation. On September 16, 2022, Sunrise Wind provided NYSDOT a written request with justification for an exception under the requirements of the Accommodation Plan for Longitudinal Use of Freeway Right-of-Way by Utilities (UAP). On April 11, 2023, the NYSDOT sent Sunrise Wind a response letter that indicated that due to the recent realignment of the Access Control Line along segments of the Long Island Expressway, the proposed longitudinal installation of the onshore facilities within the Long Island Expressway South Service Road is now outside the jurisdiction of the Federal Highway Administration (FHWA) and concurrence for an exception to the UAP will not be required. The letter further indicated that based on realignment, FHWA approval will only be necessary for the two proposed perpendicular crossings of the Long Island Expressway and Sunrise Highway. It will be necessary for Sunrise Wind to coordinate with NYSDOT to ensure that all required information to support FHWA approval of these two crossings is obtained and that the installation, operation, and decommissioning meets all NYSDOT conditions relative to the NYSDOT's Requirements for the Design and Construction of</p>

Comment No.	Comment	Response
	<p>not consider the impact to traffic safety and transportation infrastructure integrity. At NYSDOT's request, FHWA will review the accommodation request in accordance with 23 CFR Parts 645 and 771. Additionally, the request must demonstrate that the accommodation will not adversely impact the design, construction, operation, maintenance, or stability of the highway and that it will not interfere with or impair future expansion of the highway.</p>	<p>Underground Utility Installations within the State Highway Right-of-Way.</p>
<p>BOEM-2022-0071-0257-0010</p>	<p>NYSDOT has observed that the Revolution Wind DEIS, made available for public comment in September 2022, acknowledges that "The onshore elements of the Proposed Action are included in BOEM's analysis in the EIS to support analysis of a complete Project; however, BOEM's authority under the OCSLA only extends to the activities on the OCS." The Revolution Wind DEIS evaluates environmental impacts within the project envelope as described the project's Construction and Operation Plan (COP) and evaluates the onshore transmission line as a design envelope by acknowledging the ongoing evaluation of possible onshore routes. NYSDOT encourages BOEM to evaluate the onshore components of the Sunrise Wind transmission line by applying the project envelope as done in the Revolution Wind DEIS.</p>	<p>The onshore elements of the Proposed Action for the Sunrise Wind Project also evaluated the environmental impacts within the Project envelope as described in the Project's Construction and Operation Plan (COP). Section 2.2.1.1 of the COP describes the siting alternatives considered for the Project's onshore facilities and analyzed each alternative to come to the proposed onshore components of the Sunrise Wind transmission line as included in the Project Design Envelope. In this EIS, BOEM has evaluated the onshore components of the Sunrise Wind transmission line by applying the Project envelope as was done in the Revolution Wind Draft EIS.</p>
<p>BOEM-2022-0071-0065-0021</p>	<p>Throughout the scoping and EIS process, both Ørsted and BOEM collaborated with stakeholder groups and hosted a series of public information sessions for residents to learn more about the projects and provide feedback. CCE commends Ørsted for their community</p>	<p>Thank you for your comment.</p>

Comment No.	Comment	Response
	<p>outreach efforts and their continued commitment to keep diverse stakeholder groups, community leaders, and the public in-the-loop on ongoing updates as Sunrise Wind moves through the approval process. Due to sustained dialogue and commendable outreach efforts, Suffolk County and Brookhaven Town have already approved land-use agreements for the cable route for Sunrise Wind. The project has widespread support in municipalities that will be hosting the onshore landing and cable route.</p>	
<p>BOEM-2022-0071-0257-0001</p>	<p>The New York State Department of Transportation (NYSDOT) submits the below comments in response to the Bureau of Ocean Energy Management’s (BOEM) Notice of Availability of a Draft Environmental Impact Statement (DEIS) for the review of a construction and operations plan (COP) for the Sunrise Wind Project (Project or Proposed Action) offshore New York. NYSDOT is a full partner with State and federal agencies in achieving climate goals and acknowledges the role of renewable energy projects in meeting those goals. In participating in the review of proposed renewable energy projects, NYSDOT retains its jurisdictional authority over the State highway system and maintains that the safety of the traveling public and the operational integrity of the transportation infrastructure is of foremost priority in the use of the corridors. NYSDOT submits a summary of the evaluative process for alternate uses of transportation corridors and comments to the DEIS as set forth below.</p>	<p>Thank you for your comment.</p>



Comment No.	Comment	Response
BOEM-2022-0071-0257-0002	<p>Access control to highways is one of the most significant design features contributing to the safety and traffic carrying capacity of a freeway system. As the State's highway oversight agency, NYSDOT has the responsibility to ensure that any decision related to utility accommodations within freeway right-of-way (ROW) receives due diligence in weighing the benefits and risks of all the various options and a thorough evaluation of alternatives to the occupation of a utility facility within a controlled access ROW. Pursuant to 23 CFR § 1.23(b), when the State acquires property for a highway project, the State must devote use of said property exclusively to highway purposes. The Sunrise Wind DEIS identifies an onshore transmission line alignment within the State Highway Right-of-Way. This alignment is described to include sections of a South Service Road of the Long Island Expressway (LIE) and requires an exception to the Federal Highway Administration (FHWA) approved NYS Utilities Accommodation Plan. The use of the Highway ROW for the longitudinal installation of a utility facility is subject to NYSDOT review and recommendation to FHWA for approval.</p>	Thank you for your comment.
BOEM-2022-0071-0257-0003	<p>The installation of a utility facility within the control access line requires FHWA approval for an exception to the federally-approved New York State Utility Accommodation Plan (NYS UAP) found at 17 NYCRR Part 131 ("Accommodation of Utilities Within State Highway Right-of-Way"). Utility facilities are defined in 17 NYCRR § 131.5(z). Each request for longitudinal occupancy of a</p>	Thank you for your comment.

Comment No.	Comment	Response
	<p>freeway by a non-communications utility must be submitted as a request for an exception to the current FHWA-approved NYS UAP. FHWA regulations at 23 CFR Part 645 Subpart B provide the process utility facilities must follow to be permitted to longitudinally occupy the right-of-way in a manner that is safe for the traveling public. An applicant’s request to NYSDOT for an exception to the NYS UAP is an accommodation process consisting of requirements which must be satisfied to ensure that the utility facility does not “...impair the highway or interfere with the free and safe flow of traffic thereon” (23 CFR § 1.23(c)). When a utility facility crosses the control access line and installation is sought within the controlled access ROW (17 NYCRR § 131.6), then the installation shall be subject to 23 CFR Part 645, 17 NYCRR Part 131 and the nationally recognized standards in AASHTO (American Association of State Highway and Transportation Officials) in seeking an exception to the NYS UAP.</p>	
BOEM-2022-0071-0257-0004	<p>A utility facility installation within a State Highway ROW must meet the requirements of the NYSDOT Design Manual and the NYS Accommodation Plan for Longitudinal Use of Freeway Right-of-Way by Utilities (October 1995). The NYS Accommodation Plan (or Plan) is a federally-approved plan for the longitudinal installation of only communication lines within controlled access State Highway ROWs. A utility facility, other than a communication line, seeking longitudinal installation within the controlled access State Highway ROW will first need to obtain NYSDOT’s agreement for</p>	Thank you for your comment.

Comment No.	Comment	Response
	<p>an exception to the Plan and NYSDOT will then seek FHWA approval of the exception request. NYSDOT will need to approve a Maintenance and Protection of Traffic (MPT) plan prior to any utility installation within a Highway ROW. Further review of the design will be required for placement of a utility facility on a bridge, overpass, or near a ramp structure.</p>	
<p>BOEM-2022-0071-0257-0005</p>	<p>FHWA and NYSDOT have entered into a five-year Programmatic Agreement entitled “Regarding the Processing of Actions Classified as Categorical Exclusions for Federal-Aid Highway Projects”. Environmental determinations pursuant to Section 4(f) of the U.S. Department of Transportation Act of 1966, Section 106 of the National Historic Preservation Act, and Endangered Species Act Section 7 as listed in the Federal Environmental Approvals Worksheet (FEAW) must be completed for NYSDOT to determine if thresholds are exceeded, as set forth in Section IV(A)(1)(e) of the Agreement. Both NYSDOT and FHWA must approve the request. Further, the FHWA approval for an exception to the NYS UAP will require compliance with NEPA.2 The NYSDOT Transportation Environmental Manual (TEM) thresholds for at NEPA review are found in the FEAW and provides the framework for evaluating FHWA reviews.</p>	<p>Thank you for your comment.</p>
<p>BOEM-2022-0071-0257-0007</p>	<p>The DEIS at pages 2-10, 2-11, 2-12, 3-619 and 3-620 describes the preferred alignment for the transmission line onshore route including the longitudinal installation within the controlled access line of the Interstate I-495 (Long Island Expressway) in the South Service Road, a</p>	<p>Sunrise Wind was granted a NYSDOT Permit on September 15, 2023 for these construction activities.</p>

Comment No.	Comment	Response
	<p>trenchless perpendicular crossing beneath the LIE, and trenchless crossing of the Sunrise Highway (State Route 27). The transmission line installation requires NYSDOT review and FHWA approval prior to installation within the controlled access line of a State Highway, which includes the LIE South Service Road and perpendicular crossing beneath the LIE and Sunrise Highway.</p>	
<p>BOEM-2022-0071-0257-0011</p>	<p>Thank you for your time and consideration of NYSDOT’s comments. We look forward to BOEM engaging with NYSDOT in a collaborative process for the Sunrise Wind Farm transmission line components and for future projects.</p>	<p>Thank you for your comment.</p>

**O.6.14. Marine Mammals**

**Table O-23. Responses to Comments on Marine Mammals**

Comment No.	Comment	Response
<p>BOEM-2022-0071-0013 &amp; BOEM-2022-0071-0017</p>	<p>How many more dead whales?</p> <p>In the last few years whales stranded on the beaches of the East Coast have become common. In just the past two months there have been over a dozen. And that does not include the whales that have died in that time and sank to the bottom of the ocean. Fishermen blame industrial wind farm surveys, the wind industry blames climate change and the vessel strikes of the global supply chains of civilization will not slow down. All the while mainstream “environmental” groups have become PR people for industrial energy. That stance is mutually exclusive from their professed goal to protect wildlife like desert tortoise, sage grouse, bats and to Save The Whales.</p> <p>NOAA declared an official “unusual mortality event” for humpback whales in 2016, when the number of deaths on the East Coast more than doubled from the average in previous years. Coincidentally that is the same year when offshore wind development began. Which coincides with the huge jump in NOAA Incidental Harassment Authorizations. The claim that this huge jump in mortality predates offshore wind preparation activities is patently false. This strong correlation is strong evidence of causation, especially since no other possible cause has appeared. It also seems odd that</p>	<p>These whale mortalities are part of the Unusual Mortality Events (UMEs) for the NARW and the humpback whale. To date, there is no scientific evidence that the recent whale mortalities occurring along the east coast of the U.S. are related to offshore wind development activities. NARW mortalities in 2023 have been linked to vessel strikes and perinatal causes. Of the 90 humpback whales examined during this UME, about 40 percent had evidence of human interaction, either ship strike or entanglement. Some whales have shown evidence of pre-mortem vessel strikes; however, this finding is not consistent across all whales examined. For additional information on these UMEs, see <a href="https://www.fisheries.noaa.gov/national/marine-life-distress/active-and-closed-unusual-mortality-events">https://www.fisheries.noaa.gov/national/marine-life-distress/active-and-closed-unusual-mortality-events</a>.</p>

Comment No.	Comment	Response
	<p>dead whales are now showing up on the west coast just as wind development is starting up there as well. If what we are seeing is what happens during the surveying process for an offshore wind farm, we can only imagine what will happen when major construction begins. If vessel strikes are a leading cause of death, why on earth would you diminish habitat and increase vessel traffic with the construction of wind turbines. Yet in the recent denial a vessel speed reduction NOAA said, it was “focused on implementing long-term, substantive vessel strike risk reduction measures”. Hopefully that will include the cancelation of any further wind farm construction. We certainly should not be increasing vessel traffic at this time, we should be restricting it. Vessel strikes and ocean noise from these extra ships and their sonar mapping is killing whales.</p> <p>Noise interrupts the normal behavior of whales and interferes with their communication. It also reduces their ability to detect and avoid predators and human hazards, navigate, identify physical surroundings, find food, and find mates. - Such effects make it difficult for whales to avoid ships. It is one of NOAA's four Threats along with vessel strikes, fishing gear entanglements and climate change.</p> <p>Sound travels further and four times faster in water than in air (at a speed of almost 1,500 meters per second). The noise produced by humans can therefore spread considerable distances underwater. These sounds can</p>	

Comment No.	Comment	Response
	<p>be relatively constant, such as the noise produced by a ship’s engine and propeller, or sudden and acute in the case of naval sonar and seismic airguns. The sound produced by a seismic airgun can cause permanent hearing loss, tissue damage and even death in nearby animals.</p> <p>Evidence for the lethal effects of noise can be hard to document in the open ocean. But seismic surveys have been linked to the mass mortality of squid and zooplankton. In 2017, research revealed that a single air gun caused the death rate of zooplankton to increase from 18% to 40–60% over a 1.2 kilometer stretch of the ocean off the coast of southern Tasmania.</p> <p>Examination of the dead whales revealed they had suffered trauma similar to decompression sickness. This was believed to have been caused by sudden changes in their deep diving behavior following exposure to sonar. The wind companies are using sonar in the geotechnical and site characterization surveys. There is also the detonation of unexploded ordnance (UXO) items from ship wrecks at this time, accidental and intentional.</p> <p>Noise increases animals physiological stress. Research found that a reduction in shipping following the 9/11 terrorist attacks led to a six decibel drop in noise levels in the Bay of Fundy on Canada’s Atlantic coast. This coincided with lower levels of physiological stress detected in North Atlantic right whales when</p>	

Comment No.	Comment	Response
	<p>researchers measured stress hormones from floating whale feces.</p> <p>During construction of the turbines, high duty cycle impact pile driving (one strike every ~two seconds) will be used. And the pile driving is expected to occur for approximately four hours at one time for monopile installation and 6 hours per pile for piled jacket installation.</p> <p>This takes us to biggest threat to whales, and the ocean ecosystem that they live in, which is climate change. Climate change is caused by greenhouse gas emissions. These are created by industrial development. So climate change is a symptom of industrial development. That is the extractive industries of mining, deforestation, agriculture, factory fishing and dams which provide, through production, manufacture, transport, installation and operation, the current conveniences of a modern way of human life.</p> <p>Industrial development destroys ecosystems. More industrial development, by the installation of thousands of offshore wind turbines, will not solve the problem of climate change. There's one inescapable truth about the headlong rush to cover vast swaths of our countryside and oceans with 600-foot-high wind turbines: the more turbines that get built, the more wildlife will be harmed or killed. And no amount of greenwashing can change that fact. So it is distressing to see the numbers of</p>	



Comment No.	Comment	Response
	<p>whales washing up on our beaches. NOAA also says there is no proof that offshore wind is killing the whales. We must remember the onus isn't on whales to prove guilt, it's on industrial development to prove their innocence.</p> <p>The production of the materials as well as the manufacturing processes for wind turbines and associated infrastructure of the extracted energy storage and transmission are made possible by burning fossil fuels. To obtain the raw material used in wind turbines, habit is destroyed through open pit mining and mountaintop removal. These are then transported to processing plants to be turned into the component parts. It will take a tremendous amount of energy to mine the materials; transport and transform them through industrial processes like smelting; turn them into wind turbines, batteries, infrastructure, and industrial machinery; install all of the above, and do this at a sufficient scale to replace our current fossil-fuel-based industrial system. In the early stages of the process, this energy will have to come mostly from fossil fuels, since they supply about 80 percent of current global energy. Their emissions will be added to the current use emissions. After manufacture, the turbine parts need to be transported to the project location. The construction and operation of offshore wind farms increase boat traffic also leading to more greenhouse gas emissions and pollution. All of which adds to a non-existent carbon budget and thus</p>	

Comment No.	Comment	Response
	<p>increasing climate change. Not to mention the increased risk of marine mammal vessel strikes.</p> <p>All of that energy use has a carbon payback period to plan, build, maintain and decommission the processes involved in an offshore wind turbine and its required infrastructure amounting to many years. This could be up to a quarter of its' expected lifecycle. But this does not take into account the wildlife loss and habit destruction from those processes. And then in 20 years the process must be done all over again. So this is not renewable. Also there are not enough metals on the planet to produce even the first generation of a total electric energy extracting transition, even if we mine the deep sea as we are starting to do.</p> <p>Currently only 20% of our energy is electric. The other 80% is fossil fuel, the bulk of which is used by industry. The industrial advantage of fossil fuel is that it is stored energy that is extracted rather than an energy extracting device that requires storage and transmission infrastructure.</p> <p>The paradox of "renewables" is that they need unprecedented volumes of non-renewable mined materials. Increasing "renewables" means large upticks in battery metals such as copper, cobalt, lithium and nickel. Wind turbines need rare earth metals such as neodymium of which there are scarce amounts. But the work wouldn't stop there. Closed mines themselves are</p>	

Comment No.	Comment	Response
	<p>a huge source of devastation. If all mining stopped today there would still be an area at least the size of Austria with degrading and, in some cases, dangerous levels of heavy metals. Mining brings materials that have been locked-up in concentrations underground and lets them out into the world. Mines usually operate at depths below the water table, they need to be constantly dewatered using pumps. When a mine is abandoned, the ground water gradually re-floods underground passages and mineral seams over many months, creating acidic reservoirs of water. Above ground there are tailings ponds and piles of low-grade ore with traces of heavy metals. All of this material is exposed to oxygen and water. Exposing such elements to the elements, wreaks havoc on ecosystems, soils and water supplies through acid leaching. A mine that is abandoned can have chronic pollution for hundreds if not thousands of years.</p> <p>Cleaning up a mine consists of reducing water acidity, detoxifying the soil and treating waste before reintroducing flora and fauna to the site. It's a lengthy, expensive process and can cost billions for a single, large mine. Avoiding an environmental catastrophe, and cleaning all the world's mines at once, would cost hundreds of billions or even trillions. So mining the materials needed for renewable energy will increase the threats to biodiversity. These threats will surpass those avoided by "renewable" climate change mitigation.</p>	

Comment No.	Comment	Response
	<p>The concept of material footprints, in addition to carbon footprints, should be taken into consideration by governments. If not the planet's scarce non-renewable resources will continue to be destroyed. These factors will more than offset BOEMs calculations for climate change in their DEIS.</p> <p>During their operation wind turbines creates a disturbance in the air that can have far-reaching effects on the environment. The turbulence created is known to warm up the surface temperature around them. The warming can raise the temperature by up to 2°F. This will change the climate by taking away the cooling breeze. Wind turbines will change weather patterns and currents which will create more and stronger storms.</p> <p>Michael Moore, a senior scientist at the Woods Hole Oceanographic Institution, said whales face "a suite of risks" as turbines are built, such as increased vessel traffic and potential changes to the ecology. But that ecological change, he said, "needs significant further study to truly understand its significance."</p> <p>As Sunrise admits their planned construction and operations activities are not expected to "take" MORE than small numbers of marine mammals. They say incidental take long term impacts that have negative effects on large whales from the presence of turbine foundations is uncertain. For the Right Whale according to NOAA Fisheries "The potential biological removal level for the species, defined as the maximum number of</p>	

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	<p>animals that can be removed annually while allowing the stock to reach or maintain its optimal sustainable population level, is less than 1.” This means the death of a single whale could make the difference between extinction and recovery. There is no question wind turbines kill wildlife. Humans and domestic animals account for 96% mammal biomass on the planet, only 4% is wild. Our activity has reduced the biomass of wild marine and terrestrial mammals by six times. Humanity has wiped out 60% of mammals, birds, fish and reptiles since 1970, leading the world’s foremost experts to warn that the annihilation of wildlife is now an emergency that threatens all life on the planet.</p> <p>Prof Bob Watson, one of the world’s most eminent environmental scientists and currently chair of an intergovernmental panel on biodiversity that said that the "destruction of nature is as dangerous as climate change."</p> <p>Said Jennifer Jacquet, a professor of environmental studies at New York University. “But we know that even in the face of a shifting climate, direct exploitation remains the largest factor affecting aquatic animals.”</p> <p>BOEM is basing its’ conclusions in the DEIS on a false analysis that offshore wind turbines will reduce climate change. They will not. It makes no sense to increase disturbance to whales when they are suffering through an unusual mortality event. Whales as a keystone species are the canary in the coal mine. As they go, so do we. That in the effort to save the climate and</p>	

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	<p>continuance of business as usual, we are destroying the environment. If you continue with this offshore wind project, it will be humans that experience an unusual mortality event.</p>	
<p>BOEM-2022-0071-0229-0012</p>	<p>We also agree with all NMFS' other concerns regarding lack of BOEM EFH analysis/regulatory compliance detailed in their October 7, 2022 letter, and incorporate them here by reference. We particularly note this regarding UXO detonation/deflagration concerns. Recently, an unplanned UXO detonation occurred in the UK, while a UXO disposal expert attempted to slow burn/deflagrate a UXO. Therefore, all analysis must include, and even expect, worst case scenarios regarding UXO removal analysis, as even the best attempts at slow burn deflagration can result in major unplanned detonations. These impacts would also apply to the Marine Mammal section, particularly regarding the critically endangered North Atlantic Right Whale. We also incorporate by reference here all NMFS concerns regarding EFH that were submitted to BOEM regarding South Fork Wind Farm, which we have attached with this comment letter, as the South Fork project is adjacent to the proposed Sunrise Wind Project and would create similar adverse effects. Adequate UXO analysis seems to be absent both project documents, as they were from the Revolution and Vineyard Wind documents, as we discussed in our comments on the Revolution Wind DEIS which we also incorporate here by reference.</p>	<p>Analysis is included in Section 3.11.5.1.2. The model used assumes UXO detonation without slow burn deflagration, but with a required 10 dB of broadband attenuation.</p>

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BOEM-2022-0071-0232-0031	<p>Although offshore wind companies may not use the traditional airguns to collect their high-resolution geophysical maps of the seabed, they do employ high voltage, boomers (3000 V), sparkers (20-200Hz), and multi-beam echo sounders, side scan sonars (100- 500 kHz), shallow and mid penetration sub-bottom profilers, ultra short baseline positioning equipment, and marine magnetometers. These mid-frequency seismic ranges can cause rectified diffusion. Rectified diffusion can initiate decompression sickness in marine mammals independent of any effect on the behavior of the animals. Decompression sickness, can disorient, cause hearing loss, unconsciousness, and death. Moreover, any of these symptoms can then increase a marine mammal’s risk of ship strikes. Neither BOEM nor NOAA adequately addresses this issue. An absence of evidence does not mean evidence of absence. The current rate of whale deaths suggests the development has violated the MMPA and the ESA.</p>	<p>Boomers and sparkers may be used, but with a maximum source level (at 1 m) of 211 dB (peak). The proposed equipment produces source levels that are orders of magnitude lower energy than air guns, boomers, and sparkers that have source levels up to 247 dBpk. At the energy levels proposed to be used for this Project, the risk of rectified diffusion is less than 1 m from the sound source, and therefore is extremely unlikely to occur. A table of expected equipment has been added to the document.</p>
BOEM-2022-0071-0232-0033	<p>The US has designated the area planned for construction as a critical habitat for the North Atlantic Right Whale (NARW). With only 349 members alive today, the NARW faces extinction. The unusual mortality event (UME) that began in 2017 has affected 20% of the population. Deaths outpace births. Pre-construction seismic surveys and impact drilling within whale habitats coincided with the onset of their UME and the most recent NARW death today (02/14/2023) substantiates this association. BOEM and NOAA have a legal obligation to protect and promote the recovery of this species under the ESA and</p>	<p>BOEM and all federal action agencies are required to use the best available scientific information. The best available information indicates that the UME is not related to seismic surveys for offshore wind farms. Additionally, the equipment that will be used in mapping does not include air guns, and sparkers or boomers are anticipated to operate at a maximum of 211 dB peak. A table has been added to the document describing the anticipated equipment and source levels. None of the included survey is expected to pose a risk of non-auditory or auditory injury with the included monitoring</p>

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	<p>the MMPA. Absence of Evidence is NOT evidence of absence. Seismic surveys are associated with whale morbidity and mortality (Engel, 2004). As evidenced by the most recent death, BOEM’s monitoring mitigation strategies cannot ensure the safety of the species. Because whales sequester carbon, the loss of a single whale, let alone an entire whale species, will increase the carbon footprint of this project (Chami, 2019). Offshore wind farms (OWFs) will inevitably drive threatened whale species closer to extinction (Seals, 2017). The BOEM DEIS violates the MMPA and the ESA.</p>	<p>and mitigation measures.</p>
<p>BOEM-2022-0071-0242-0005</p>	<p>Extend the time period of the proposed seasonal restriction from December 1 through April 30;</p>	<p>Shutdowns are proposed during the months identified in the acoustic modeling report. No UXO/MEC detonations would occur between December and April, and mitigation zones for all species including NARW will be applied accordingly depending on the season in which work is performed, summer (May-November) or winter (December-April). Please see Appendix H for more details on mitigation measures and Terms and Conditions from the NMFS Biological Opinion Issued September 28, 2023.</p>
<p>BOEM-2022-0071-0242-0020</p>	<p>According to the DEIS, of the 40 marine mammal species with occurrence records off the northeastern coast of the U.S., 16 species are expected to occur in the proposed Project Area. Four species of large whale are listed as endangered under the ESA and as strategic stocks under the MMPA: North Atlantic right whale (or right whale), fin whale, sei whale, and sperm whale. Additional species include two mysticetes (humpback whale and common minke whale), two pinnipeds (gray</p>	<p>Thank you for your comment. The abundance estimates for marine mammals have been updated based on Duke University’s Habitat-based Marine Mammal Density Models for the U.S. Atlantic. These models were updated in June 2022 and include survey effort data collected between 1992-2020 and the version 12 model the NARW. See Table 3.11-2 Abundance Estimates of Marine Mammals Expected to Occur in the Proposed Project Area.</p>



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	<p>and harbor seal), and eight odontocetes, including the Western North Atlantic Northern Migratory Coastal stock of common bottlenose dolphins which is considered a strategic stock under the MMPA. Right whales, humpback whales, and minke whales are currently experiencing elevated levels of mortality and injury that have been designated by the National Marine Fisheries Service (NMFS) as unusual mortality events (UME). Expected marine mammal occurrence in the Sunrise Wind Project Area and broader region as analyzed in the DEIS is based on known habitat associations, habitat modeling, confirmed sightings, and acoustic detections. As such, the data and information referenced in the DEIS is relatively comprehensive; however, there are some more up-to-date data sources that should be considered:</p>	
<p>BOEM-2022-0071-0242-0021</p>	<p>Abundance and Density Estimates: The Roberts et al. models have recently been updated as of 2022, and BOEM should include these data before the Final EIS is published to fully assess risk and impacts to species in the Project Area.</p>	<p>Updates were made based on the most recent available estimates.</p>
<p>BOEM-2022-0071-0242-0022</p>	<p>Additional Data Sources for North Atlantic Right Whales: To better characterize North Atlantic right whale occurrence and habitat use, BOEM should consider all available data sources, including photo-identification data, stranding data, the location of Dynamic Management Areas (DMAs) declared by NMFS pursuant to ship strike rule, and prey data.</p>	<p>Summary background is provided in Section 3.11.1, including occurrence and habitat use in the Project Area and nearby regions.</p>

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BOEM-2022-0071-0242-0024	<p>In addition to the now outdated abundance estimate for North Atlantic right whales from the 2021 Stock Assessment Report (n=368), we were encouraged to see the DEIS included the updated abundance estimate for North Atlantic right whales released in the North Atlantic Right Whale Consortium’s (NARWC) annual Report Cards, considered best available scientific information on the species. We note that the NARWC recently revised its 2021 population estimate to 340 individuals. BOEM should include this updated estimate in the DEIS and, critically, carry it forward to the impact analysis.</p>	<p>Updates were made based on the most recent available estimates.</p>
BOEM-2022-0071-0242-0025	<p>We are concerned with the overall conclusion of BOEM’s impact analysis for the Proposed Action for marine mammals. Due largely to the adverse impacts that may result from pile driving and vessel strike, “BOEM expects the overall impact on marine mammals from the Proposed Action to be moderate as the overall impacts on individuals and/or their habitat could have population-level effects, but the population can significantly recover from impacts or enough habitat is still functional to maintain the viability of the species both locally and throughout the range.” This conclusion underestimates risk to North Atlantic right whales from vessel strike.</p> <p>A single North Atlantic right whale cannot be killed or seriously injured by a vessel strike, or any other human activity, in any given year if the species is to survive. BOEM defines major impacts as “detectable and</p>	<p>BOEM believes the included monitoring and mitigation measures for vessel traffic will be sufficient to avoid risk of vessel strike to NARW. BOEM is currently engaged in Section 7 consultation with NMFS. Through this process, we anticipate that any final monitoring and mitigation measures finalized during that process will be sufficient to avoid impacts to NARW in accordance with the requirements of the Endangered Species Act.</p>

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	<p>measurable,” “of severe intensity,” and “can be long lasting or permanent.” Further, major impacts “to individuals and/or their habitat would have severe population-level effects and compromise the viability of the species.” Based on this definition, vessel strike clearly represents a major impact for North Atlantic right whales.</p> <p>BOEM should capture this distinction for this critically endangered species in its impact analysis, as it has done so previously; this will help ensure that appropriate avoidance, minimization, and mitigation measures are developed and required to address the outsized risk posed to North Atlantic right whales. BOEM also concludes that the Proposed Action may potentially include minor beneficial impacts from an increase in prey availability. We remind BOEM that there is little to no literature currently available to support the assumption that offshore wind development will provide tangible benefit to marine mammals. In fact, recent scientific information suggests that hydrographic changes induced by the turbines may affect marine mammal prey in a variety of ways, many of which are still to be determined. Due to a lack of evidence and significant uncertainties, BOEM should not include an assumption of increased prey availability as a benefit as part of its overall conclusion on the impacts of the Proposed Action.</p>	
BOEM-2022-0071-0242-0028	Within the DEIS, BOEM asserts that pile-driving activities will likely exceed permanent threshold shifts (PTS) and	Currently, sound energy is considered to accumulate whenever individuals are exposed to noise greater than

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	<p>temporary threshold shifts (TTS) for all marine mammal functional hearing groups. We note that behavioral impacts resulting from noise exposure can be significant and the best available scientific information on this matter is not incorporated into the DEIS. For example, BOEM states: “The potential for these stressors to have population-level on sequences likely varies by species, among individuals, across situational contexts, and by geographic and temporal scales (Southall et al. 2021),” but does not provide further analysis of what is known. There are data available beyond the Southall et al. (2021) risk assessment that BOEM should consider. For example, scientific information on North Atlantic right whale functional ecology shows that the species employs a “high-drag” foraging strategy that enables them to selectively target high-density prey patches but is energetically expensive. Thus if access to prey is limited in any way, the ability of the whale to offset its energy expenditure during foraging is jeopardized. In fact, researchers have concluded: “right whales acquire their energy in a relatively short period of intense foraging; even moderate changes in their feeding behavior or prey energy density are likely to negatively impact their yearly energy budgets and therefore reduce fitness substantially.” North Atlantic right whales are already experiencing significant food stress: juveniles, adults and lactating females have significantly poorer body condition relative to southern right whales and the poor condition of lactating females may cause a reduction in calf growth. A recent study confirmed that</p>	<p>150 dB sel. When the number of impact events goes over a certain number, the area of potential PTS becomes larger than the area of behavioral disturbance (based on the 160 dB rms threshold). This results in PTS areas are equal to or larger than behavioral disturbance. Because of this, shutdown zones are protective against both PTS and behavioral impacts.</p>

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	<p>larger females do, indeed, have more calves. These studies provide an indication of the significant impact disturbance during foraging may have on a marine mammal species. The waters off southern New England are a critically important foraging area for North Atlantic right whales; for this Final EIS, and other DEISs that are forthcoming, BOEM must fully assess the impacts associated with disturbance of North Atlantic right whales and other marine mammal species during foraging, at the spatial and temporal scale those impacts are expected to occur, for individual projects and cumulatively across projects. As the energetic requirements of many marine mammal species are not yet known, we recommend BOEM proceed with this analysis in a precautionary manner, and support research aimed at addressing these knowledge gaps.</p>	
<p>BOEM-2022-0071-0242-0030</p>	<p>BOEM must use the best available scientific information on marine mammal presence and density, as required by NEPA, when considering seasonal restrictions to protect North Atlantic right whales and measures designed to minimize impacts to other marine mammal stocks in the Sunrise Wind Project Area. BOEM proposes a four-month seasonal restriction on impact pile driving from January 1 through April 30 to minimize impacts to North Atlantic right whales. However, these dates do not reflect the best available scientific information for the Project Area and broader region where right whales are often detected outside of this time period.</p> <p>Since 2010, the distribution and habitat use of North Atlantic right whales and other large whale species off</p>	<p>BOEM uses the best available scientific information and has made recommendations based on this data.</p>

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	<p>the U.S. East Coast has shifted in response to climate change-driven shifts in prey availability. Best available scientific data indicates that North Atlantic right whales now rely heavily on the waters within, and in the vicinity of, the Sunrise Wind Project Area year-round, and that this area is increasing in habitat importance for the species.</p> <p>A recent scientific study led by the New England Aquarium analyzed data collected during systematic aerial surveys conducted within the offshore wind energy development area off Southern New England, as well as from across the broader region. The resulting multi-year data set enabled a comparison between two different time periods (2013-2015 and 2017-2019) to assess trends in abundance of right whales in the region in the winter and spring. The study confirmed a growing understanding that the number of right whales using habitat off Southern New England—known to be a historic whaling ground—in the winter and spring significantly increased between 2013 and 2019. Right whales were also detected during every season surveyed from 2017 to 2019. Confirmed year-round detection is unique among major right whale habitats. During these surveys, right whales were also observed feeding and socializing in groups. The authors conclude that their results, when interpreted alongside previous studies, “suggest that [Southern New England] represents an increasingly important habitat for the declining right whale population.”</p>	

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BOEM-2022-0071-0242-0031	<p>Scientific analysis comparing the Northeast Large Pelagic Survey Collaborative (NLPSC) aerial survey campaigns conducted in 2011-2015 with those conducted in 2017-2019 also show that right whales have been sighted in nearly every month since 2017, with peak sighting rates between late winter and spring. Modeling suggests that 23 percent of the population is present from December through May each year, and that mean residence time has tripled to an average of 13 days during these months. A total of 327 unique right whales were identified during the combined survey effort off Southern New England between March 2011 and December 2019; by the end of 2019, 87 percent of the then living population had been sighted.</p> <p>All demographic classes of right whales have been documented in or near the Project Area and the age ratio of the whales using the area is reflective of the species. Both reproductive females and conceptive females have been seen in the study area. Forty-five of the 108 reproductively active females (42 percent) known to be alive during the study were sighted in the Southern New England region, and 17 were resighted in multiple years. The area also provides important habitat for cow-calf pairs. Six different calves (inferred by the presence of known mothers) were recorded during the study in southern New England (4 in 2011, 1 in 2015, 1 in 2019; 89 calves were born in the population during this time). Three calves were sighted twice in the same year.</p>	<p>Thank you for your comment, a summary of this background information can be found in the NARW section of Section 3.11.1, <i>Marine Mammals, Description of the Affected Environment and Future Baseline Conditions</i>.</p>

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	<p>The Project Area is situated within important habitat for socializing and feeding right whales and protection of animals while foraging and mating is essential to the survival of the species. Foraging areas with suitable prey density are limited relative to the overall distribution of North Atlantic right whales, and a decreasing amount of habitat is available for resting, pregnant, and lactating females. This means that unrestricted and undisturbed access to suitable areas, when they exist, is extremely important for the species to maintain its energy budget. As noted above in Section II.B.3, scientific information on North Atlantic right whale functional ecology also shows that the species employs a “high-drag” foraging strategy that enables them to selectively target high-density prey patches, but is energetically expensive. Thus, if access to prey is limited in any way, the ability of the whale to offset its energy expenditure during foraging is jeopardized.” Undisturbed access to foraging habitat is necessary to adequately protect the species, as is the minimization of disturbance during the species’ energetically expensive migration.</p> <p>Feeding behaviors have been observed in and close to the Sunrise Wind Project Area by virtually all whale species and small cetaceans regularly occurring in this area. Oceanographic studies in the area, which were part of the NLPSC campaigns, confirmed the presence of a zooplankton community composition similar to that of Cape Cod Bay, which is a known hotspot for right whale feeding. A feeding Biologically Important Area (BIA) for</p>	



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	<p>fin whales is designated March to October east of Montauk Point and feeding humpback whales are regularly observed, particularly during March and April. Courtship behaviors in the area have also been observed by humpback whales.</p>	
<p>BOEM-2022-0071-0242-0033</p>	<p>Following the mitigation hierarchy, we believe BOEM should prioritize impact avoidance and consider alternatives that use quiet foundation technologies that avoid pile driving noise entirely and significantly reduce noise impacts to marine mammals and other marine life overall. As we noted previously in these comments and in our past comments on other projects, BOEM and the developer should provide more detailed analysis to support the elimination of these technologies from consideration. Quiet foundation types can afford developers significant flexibility in the construction schedule, including potentially year-round and 24-hour construction in some areas. In our view, these incentives should be fully explored by BOEM and industry.</p> <p>Noise impacts pose a serious risk to many marine mammal species, and this risk is exacerbated by the developer’s intention to initiate pile driving of monopile foundations—the most noise intensive technological option—after dark if deemed necessary “to meet schedule requirements.” Rather than this being a rare exception, however, further scrutiny of the DEIS indicates that initiating pile driving after dark will likely be the norm. It is hard to see, for example, how the developer will install up to three or four piles per day, as</p>	<p>Thank you for your comment. As discussed in Section 2.2 Alternatives Considered but Not Analyzed in Detail, BOEM considered a range of alternatives during the EIS development process that emerged from scoping, interagency coordination, government-to-government consultation, and internal BOEM deliberations. The use of alternative foundation types, including suction bucket foundations and floating wind turbine foundation types to reduce impacts on marine mammals, sea turtles, and fish from pile driving associated with monopile and jacket foundations, are not feasible within the Lease Area. Rationale for eliminating these alternatives can be found in Table 2.2-1 of the Final EIS. "Quiet" foundation design types like the monopod suction caisson, suction caisson jacket, and gravity base structure foundations were evaluated during Project development. These options were eliminated in favor of the monopile foundation due to their larger footprints (leading to more extensive seabed and navigation impacts), unsuitability for site-specific conditions, and supply chain issues. Regarding nighttime pile driving, NMFS' ITA would require sufficient demonstration of the effectiveness of proposed monitoring and mitigation protocols in the form of an Alternative Monitoring Plan prior to initiating any nighttime pile driving.</p>

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	<p>indicated by the project design envelope and chosen modeling scenarios for the acoustic impact analysis without operating under the assumption of a 24-hour pile driving window unless additional concurrent construction vessels are planned to be in operation.</p>	
<p>BOEM-2022-0071-0242-0035</p>	<p>BOEM states that it would require Sunrise Wind to submit a nighttime pile driving monitoring plan for review and approval by BOEM and NOAA Fisheries six months prior to initiating impact pile driving activities. The purpose of the plan is to demonstrate that Sunrise Wind can meet the visual monitoring criteria for the Level A harassment zone(s)/mitigation and monitoring zones plus an agreed upon buffer zone (these combined zones are referred to henceforth as the nighttime clearance and shutdown zones) with the technologies Sunrise Wind is proposing to use for monitoring during nighttime impact pile driving. We are supportive of this approach only if initiation of impact pile driving at night is prohibited unless the plan is approved, and only if the technologies and methodologies proposed are independently and scientifically proven (i.e., via peer-reviewed scientific study) to have detection rates that are equally or more effective than can be achieved by monitoring during daylight hours with good visibility conditions.</p> <p>Additionally, the description of the Nighttime Pile Driving Monitoring Plan requires further clarification. The DEIS states “[i]f, during nighttime pile driving, undetected animals are found in the clearance and/or</p>	<p>Nighttime pile driving mitigation and the Nighttime Pile Driving Monitoring Plan are discussed in Appendix H. BOEM and NMFS will work together to develop the plan to meet the appropriate criteria. Below are some technologies and methodologies that would be used to achieve these goals. However, please see Appendix H for more details on nighttime pile driving mitigation and monitoring.</p> <ul style="list-style-type: none"> <li>• Pile driving during nighttime hours could potentially occur when a pile installation is started during daylight and, due to unforeseen circumstances, would need to be finished after dark. New piles could be initiated after dark to meet schedule requirements.</li> <li>• Visual PSOs will rotate in pairs: one observing with a handheld night vision device (NVD) and one monitoring the infrared (IR) thermal imaging camera system. There will also be a PAM operator on duty conducting acoustic monitoring in coordination with the visual PSOs. The mounted thermal cameras may have automated detection systems or require manual monitoring by a PSO.</li> <li>• PSOs will focus their observation effort during</li> </ul>

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	<p>shutdown zones, nighttime impact pile-driving activities would cease as soon as possible in consideration of human safety, and NMFS, BOEM, and BSEE [Bureau of Safety and Environmental Enforcement] would be notified immediately.” It is unclear what BOEM means by finding undetected animals given that undetected animals are, by their nature, not detected. Clarification is also needed to understand how restart approval will be coordinated between NMFS, BOEM, and BSEE. The practicality of this plan is questionable at this time.</p>	<p>nighttime watch periods within the shutdown zones and waters immediately adjacent to the vessel.</p> <ul style="list-style-type: none"> <li>• If possible, deck lights will be extinguished or dimmed during night observations when using night-vision devices; however, if the deck lights must remain on for safety reasons, the PSO will attempt to use the NVD in areas away from potential interference by these lights. If a PSO is unable to monitor the visual clearance or shutdown zones with available NVDs. Piling will not commence or will be halted (as safe to do so).</li> </ul>
<p>BOEM-2022-0071-0242-0039</p>	<p>Additionally, a wealth of research exists which details the impacts of continuous noise on marine life, and the importance of reducing this impact. Best available scientific information indicates that, during the operation phase, offshore wind turbines may generate noise audible and potentially impactful to large whales and other marine species over significant distances. Understanding levels and impacts of operational noise is an immediate research and monitoring priority as the first offshore wind projects are constructed in the United States. Pending further study, we recommend the use of direct drive turbines as opposed to turbines with a gear box. Direct drive turbines may emit lower noise levels and reduce risk of behavioral disturbance or habitat displacement of North Atlantic right whales and other marine mammal species, and also reduce impacts to key marine mammal prey species, during the operation phase of development.</p>	<p>Thank you for your comment. This Project complies with the recommended action as it will only use direct drive turbines. However, even considering the potential use of geared turbines as described in Madsen et al. (2006), underwater noise would be expected to attenuate to the 120 dB threshold for behavioral disturbance established by NMFS within 390 ft (119 m) of an operating turbine.</p>

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BOEM-2022-0071-0242-0040	<p>We have repeatedly stressed to the agency our profound concerns regarding the recent informal consultation for marine site characterization activities for offshore wind energy development off the U.S. Atlantic Coast and its failure to rely on the best available scientific data, particularly with respect to the critically endangered North Atlantic right whale. In a letter submitted to BOEM and NMFS on January 20, 2022, a number of our organizations urged both agencies to immediately reinstate consultation under the ESA based on the best available scientific data and new North Atlantic right whale population number to ensure the mitigation measures on which BOEM is relying for site characterization and assessment activities are protective enough to reduce risk to right whales. BOEM must update the analyses now in order to comply with the ESA on this and all future Atlantic coast leases. In the interim while consultation is ongoing, our groups reinforce the importance of incorporating clear, strong environmental measures directly into the NEPA documents and lease stipulations for existing projects on a project-by-project basis. In particular, based on the significant information we are already aware of and have presented in this and other letters, we urge the agency to incorporate the mitigation measures found in Attachment 1 into upcoming environmental analyses and lease terms.</p>	<p>We thank you for your comment, but respectfully disagree. BOEM in consultation with NMFS used the best available science to produce the Programmatic Project Design Criteria and Best Management Practices for Protected Species Associated with Offshore Wind Data Collection (BOEM 2021). Within that document, there are mitigation measures and BMPs in place for use of high resolution geophysical survey equipment to mitigate impacts on ESA-listed species including the NARW.</p>
BOEM-2022-0071-0248-0022	<p>Regarding potential impacts to the critically endangered North Atlantic Right Whale, in a letter from NOAA’s Chief of Protected Species to BOEM found that</p>	<p>Currently, sound energy is considered to accumulate whenever individuals are exposed to noise greater than 150 dB sel. When impact events go over a certain</p>

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	<p>“disturbance to right whale foraging could have population-level effects on an already endangered and stressed species. <a href="https://newbedfordlight.org/wp-content/uploads/2022/11/UR1-2023-000009_10_17_2022.pdf">https://newbedfordlight.org/wp-content/uploads/2022/11/UR1-2023-000009_10_17_2022.pdf</a></p>	<p>number, the area of potential PTS becomes larger than the area of behavioral disturbance (based on the 160 dB rms threshold). This results in PTS areas that are equal to or larger than behavioral disturbance. Because of this, shutdown zones are protective against both PTS and behavioral impacts.</p>
<p>BOEM-2022-0071-0248-0023</p>	<p>In addition to potential impacts to the NARW, a concerning number of whale mortalities have been occurring the last couple of months. As of January 16, at least 8 whales have washed up on beaches along the Atlantic coast in areas where offshore wind survey operations have been taking place. This has caused one legislator to “demand that all offshore wind activity be halted until it is properly determined what the effects of these activities are having on our marine life.</p>	<p>These whale mortalities are part of the Unusual Mortality Events (UMEs) for the NARW and the humpback whale. To date, no scientific evidence suggests the recent whale mortalities occurring along the U.S. east coast are related to offshore wind development activities. NARW mortalities in 2023 have been linked to vessel strikes and perinatal causes. Of the 90 humpback whales examined during this UME, about 40 percent had evidence of human interaction, either ship strike or entanglement. A portion of the whales have shown evidence of pre-mortem vessel strike; however, this finding is not consistent across all whales examined. For additional information on these UMEs, see <a href="https://www.fisheries.noaa.gov/national/marine-life-distress/active-and-closed-unusual-mortality-events">https://www.fisheries.noaa.gov/national/marine-life-distress/active-and-closed-unusual-mortality-events</a>.</p>
<p>BOEM-2022-0071-0282-0013</p>	<p>Carl Van Warmerdam. It's C- A- R- L, V- A- N, W- A- R- M- E- R- D- A- M. So, I'm going to start with some house cleaning to specifically address, the DEIS. And that's one glaring omission. And I'm glad that you had the -- about 50 pages on the endangered sea turtle, but almost nothing on the North Atlantic right whale. And I'm here as an advocate for the North Atlantic right whale. So, the only -- there's pretty much only one paragraph in there, and that's Section 3.5.6.6.5, the impacts of alternative C</p>	<p>NARWs are considered specifically throughout the evaluation of the IPFs where appropriate. The EIS is broken out by species groups, functional groups, or functional elements, and the EIS does not contain sections for individual species. Because NARWs are listed as endangered, the potential impacts associated with this Project are considered with a high level of detail during the ESA Section 7 process. For the No Action Alternative, we are required to consider the</p>

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	<p>1 on endangered species, listed species. And pretty much all it says, I can -- it's going to take a while to read it. Impacts on ESA- listed marine mammals are not expected to be different than the non- ESA- listed marine mammals, the primary source of potential impacts for ESA- listed marine mammals include increased sound level from pile installation activities and GG surveys, project- related vessel traffic and alteration of prey availability based on it. Information contained in this document, BOEM anticipates that alternative C 1 for the Sunrise Wind farm project would likely adversely affect, but not jeopardize, the continued existence of the North Atlantic right, the sea fin or sperm whales. Now that's pretty ominous right there. I don't have to tell you that they are critically endangered and the history that of only 350 individuals. But that's all you have on there. So, that needs to be changed. There needs to be 50 pages on the North Atlantic right whale and everything covered on that. Now, there's even no mention in here of the joint BOEM and NOAA strategy for the North Atlantic right whale. That should also be in there.</p> <p>So, it's just beyond me here because you have alternatives -- alternative C-1, which is a fishery habitat impact minimization. So that by definition means that alternative B is going to impact the habitat. Now, the turtles -- endangered turtles, they come into this area, but they don't live there. The North Atlantic right whale, this is their home, their only home. So, when you</p>	<p>effects of ongoing activities and other future actions considered likely to occur. This is why ongoing and likely future actions are described along with their potential impacts on marine mammals. The No Action Alternative does not simply consider the difference between executing the Proposed Action and not executing it, it considers the baseline effects of existing conditions and activities. The alternatives have the same impact level determinations as the Proposed Action for marine mammals. This can occur even when the alternatives result in fewer individuals exposed to Project impacts because impact level determinations are based on the description of each of the impact levels, which is included at the beginning of the marine mammal section.</p>

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	<p>combine all of those into simply the marine mammals and you're putting in what each of these actions entail, and it's all the same. Each alternative is negligible to moderate or minor benefit. And that's with no action. Now, how can that be? If there's no action, nothing's going to happen. So, I mean, you can put your other claims for climate change in there, but this is going to kill the whale certainly. So, you know killing the whale to save them isn't working.</p> <p>So, I don't understand how environmental groups, conservation groups can call themselves that they're -- it's no longer about save the whales, it's about they've become advocates for an industrial development. So that's what they're promoting now. And I just don't understand it. I believe that those groups should be and we should save the whales. Thank you.</p>	

**O.6.15. Navigation and Vessel Traffic**

**Table O-24. Responses to Comments on Navigation and Vessel Traffic**

Comment No.	Comment	Response
BOEM-2022-0071-0031	<p>Dear Ms. Stromberg,</p> <p>The American Waterways Operators (AWO) is the tugboat, towboat and barge industry’s advocate, resource, and united voice for safe, sustainable, and efficient transportation on America’s waterways, oceans, and coasts. Our industry is the largest segment of the nation’s 40,000-vessel domestic maritime fleet and moves 665 million tons of cargo each year safely and efficiently. On behalf of AWO’s more than 300 member companies, we appreciate the opportunity to comment on the Sunrise Wind Farm Project Draft Environmental Impact Statement.</p> <p>AWO members lead the maritime industry in safety, security, and environmental stewardship. We are committed to working with federal and state agencies to advance these shared objectives. Our commitment to sustainability includes strong support for the development of alternative energy resources. However, it is critical that such projects not produce navigational hazards that put vessels and their crews at risk or obstruct the movement of commodities on which the nation’s economy depends. It is with these concerns in mind that we have worked closely with the Bureau of Ocean Energy Management and the U.S. Coast Guard on previous requests for comment on wind energy development areas.</p> <p>Although the Sunrise Wind Farm does not appear to</p>	<p>Thank you for expressing your concerns. SRWF is expected to coordinate with the maritime community and USCG to avoid laying export cables through any traditional or designated lightering/anchorage areas, meaning that any risk for deep-draft vessels would come from anchoring in an emergency scenario. In addition, the cable and other Project features would be appropriately plotted on nautical charts. For the Sunrise Wind Project, cables would typically target a burial depth of 4 to 6 ft (1.2 to 1.8 m). However, the target burial depth in specific areas along the cable routes would be determined based on an assessment of seafloor conditions, seabed mobility, and the risk of interaction with external hazards such as fishing gear and vessel anchors, which would be determined through a Cable Burial Risk Assessment if the COP is approved. This text was added to the Final EIS in Appendix Q, Section 3.19, <i>Navigation and Vessel Traffic</i>, for more clarity.</p>



Comment No.	Comment	Response
	<p>conflict with traditional towing vessel navigation routes, we remain concerned that the cabling for the proposed project would only be buried 3 to 7 feet deep. As we noted in our previous comments, if a vessel must lower an anchor during an emergency situation, vessel operators must be sure that they will not inadvertently strike an underwater cable, which could be dangerous to mariners and the environment. Cables from this project should be buried at least 15 feet deep to ensure that they are neither struck nor snared during an emergency anchoring operation. This is a best practice that is being followed in other wind projects and Sunrise Wind should follow the same parameters here to minimize the risk of damaging the cables and threatening mariner safety and the environment.</p> <p>Thank you again for the opportunity to comment. I would be pleased to provide additional comments or further information as you see fit.</p>	
BOEM-2022-0071-0229-0020	<p>BOEM’s analysis of navigational impacts for commercial fisheries and associated conclusions are insulting and incomplete. The DEIS states that “BOEM expects the industry to adopt both technological and non-technology-based measures to reduce impacts on marine radar, including greater use of AIS and electronic charting systems, new technologies like LiDAR, employing more watchstanders, and simply avoiding wind farms altogether (National Academies of Science, Technology, and Engineering 2021).” BOEM then footnotes the term “watchstanders” as if we would not know what that is, meanwhile using technical terms</p>	<p>Your comment has been addressed in Sections 3.19.5.5, 3.19.6.3, 3.19.7.4, and 3.19.8.4 under <i>Navigation and Vessel Traffic</i>.</p>

Comment No.	Comment	Response
	<p>everywhere else in the document. Simply employing more watchstanders will not solve a radar interference problem. Additionally, the costs of employing additional watchstanders simply to account for the navigational dangers caused by the proposed Project’s marine radar interference would be “economically unfeasible” for our vessels, to quote rationale from other sections of the document as regards economic infeasibility of various Alternatives. Even should BOEM require the developer to pay for such costs as part of mitigation, it would still not solve the issue.</p> <p>The commercial fishing industry already uses AIS. AIS will not help when not every turbine will be marked with AIS and the turbines/turbine blades themselves cause false reflections, sidelobes, and other interference. BOEM may not understand how AIS works; we do. AIS is not the panacea for all radar interference problems. Not all vessels- including recreational and commercial vessels- have AIS. Radar interference will make it difficult to impossible to see such vessels. Furthermore, not even every turbine would be equipped with AIS, and per the developer’s COP only “select WTGs” will be equipped with AIS, of which BOEM is well aware.</p> <p>LiDAR is used primarily for high resolution mapping and is not a current replacement for marine vessel radar. In fact, BOEM’s own study conducted via the National Academies of Science states regarding LiDAR, “Regarding the feasibility of integrating these technologies into MVR</p>	

Comment No.	Comment	Response
	<p>systems, the effective range of these systems is generally much shorter than MVR, especially in adverse weather and in the presence of smoke and other aerosols, and so their use in the marine environment requires careful evaluation and integration with other systems.” BOEM has this information, knows that LiDAR is not a currently viable solution but instead an untested hypothesis which may be an ineffective replacement for marine vessel radar particularly in inclement weather when radar is most necessary, but blithely states that “don’t worry; the fishing community can use this device which will make navigation just fine”. This is gross negligence on the part of BOEM and both the agency’s lack of analysis, deliberate ignorance of its own data, and associated DEIS conclusions are damning.</p>	
<p>BOEM-2022-0071-0229-0021</p>	<p>BOEM apparently also does not know how electronic chart systems work, nor that every commercial fishing vessel is already equipped with and utilizes electronic charts for navigation. Again, these will not solve radar interference. In fact, the USCG has discontinued issuance of paper charts and has moved exclusively to electronic charts. Therefore, all navigation will per regulation be conducted according to electronic charts anyway. Perhaps BOEM is unaware of this fact, as it is apparent that the agency has not done any analysis on navigation despite an OSCLA requirement that the agency “shall ensure” safety of navigation when conducting all wind farm related activities, which would especially include DEIS analysis. Regardless, electronic charts do not solve radar interference. That is not how</p>	<p>Your comment has been addressed in Sections 3.19.5.5, 3.19.6.3, 3.19.7.4, and 3.19.8.4 under <i>Navigation and Vessel Traffic</i>.</p>

Comment No.	Comment	Response
	<p>marine navigation works. The fact that BOEM has relegated this discussion to essentially one paragraph of discussion in the DEIS is mind boggling. Clearly, BOEM has no intention of analyzing this very real and present danger to the commercial fishing industry as the result of its ongoing actions, despite information that would dictate otherwise.</p> <p>As the National Academies of Science study that BOEM references as suggesting that the solution will be “simply avoiding wind farms altogether” - as was also noted in BOEM’s Vineyard Wind Record of Decision<sup>47</sup> - is the only feasible solution listed, BOEM must then adjust its conclusions. This is the only feasible conclusion that BOEM has presented in its DEIS analysis of navigational impacts on the commercial fishing industry. Notably, the National Academies study did not present any immediate solutions to marine vessel radar interference, merely confirmed the issue, highlighted various problems, and suggested areas for further study. As such, no solution currently exists. BOEM must integrate this data and these conclusions into its DEIS analysis, particularly as per its requirement that the Secretary “shall ensure” both “safety” and “prevention of interference with reasonable uses” per OSCLA. Radar interference counts as interference. If navigation is unsafe, and avoidance of wind farms is the only logical solution, then BOEM cannot claim that operations in the proposed Project area will be safe or feasible.</p>	

Comment No.	Comment	Response
BOEM-2022-0071-0229-0022	<p>As the MARIPARS study that BOEM continues to rely on for its navigational impacts analysis did not consider radar interference, and has since in that respect been superseded by the National Academies study, BOEM must completely update all its DEIS analysis regarding navigational impacts. Without such, and without realistic, data-based conclusions, BOEM’s DEIS is negligent, faulty at best. Therefore we request that BOEM consult with the USCG to initiate an updated MARIPARS that analyzes radar interference as it pertains to the MA/RI and MA WEAs, its impacts on navigational safety, particularly as pertains to operations in inclement weather and USCG vessel capabilities for search and rescue as impaired by radar interference for its own vessels, including a full modeling study similar to that conducted for Cape Wind which utilizes the size and number of turbines planned or expected for the MA/RI and MA WEAs, including all findings of the National Academies of Science study which noted that size and number of turbines is a significant contributing factor to interference analysis. We also request that BOEM address the factual errors discussed above related to additional watchstanders, LiDAR, AIS, and electronic charts, as none will mitigate or fix the radar interference problem. BOEM already knows the deficiencies of LiDAR and AIS as contained in its own documents discussed above. We also request that BOEM update its conclusions on navigational safety and commercial fishing impacts accordingly.</p>	<p>Your comment has been addressed in sections 3.19.5.5, 3.19.6.3, 3.19.7.4, and 3.19.8.4 under <i>Navigation and Vessel Traffic</i>. The USCG is a cooperating agency and therefore has reviewed the Draft EIS, as well as participated in agency meetings with BOEM.</p>

Comment No.	Comment	Response
BOEM-2022-0071-0248-0006	<p>In past comment letters, we pointed to how the announcement of additional areas in the New York Bight and Central Atlantic have consequences with existing leased projects, which spoke to the need for a cumulative approach. For example, designation of the Hudson North WEA impacted RODA’s collaboration with Equinor. Based on direct feedback from the fishing industry in the region, Equinor adjusted its layout design for EW 1 to reduce impacts to fishing. Unfortunately, the discussions about nuanced spacing and transit accommodations for Empire Wind were acknowledged to be greatly affected by what ultimately occurs in the Hudson North WEA, which abuts the southeastern edge of the lease. This heavily transited and fished area is now slated to become a larger contiguous developed area, further displacing existing users. Due to the many leases and expansive nature of this new infrastructure, every aspect—from biological, ecological, and physical to navigational and access-related—must be looked at in a cumulative manner.</p>	<p>Thank you for your comment. The Project has assessed cumulative impacts.</p>
BOEM-2022-0071-0251-0004	<p>Without an appropriate transit lanes through Sunrise Wind, such as the four nautical mile transit lanes that were requested during the MARIPARS, commercial fishermen will be forced into dangerous situations and lose time, fuel, and product since they will be forced to travel around the lease areas because of radar interference. These losses must be evaluated by time and economics for New York fishermen by BOEM.</p>	<p>Navigation within and around the SRWF is discussed in Sections 3.19.5.5, 3.19.6.3, 3.19.7.4, and 3.19.8.4 under <i>Navigation and Vessel Traffic</i>.</p>

**O.6.16. Other Uses**

**Table O-25. Responses to Comments on Other Uses**

Comment No.	Comment	Response
BOEM-2022-0071-0232-0030	As stated previously, BOEM must also consider the global impacts. Unfortunately, wind turbines require the mining of rare earth metals (Lanthanides, Neodymium, praseodymium, dysprosium and to some extent terbium). Mining these elements contaminates the water table, generates radioactive waste, risks harmful exposures, and generates CO2 emissions (Ives, 2013). The new push for offshore turbines has increased the demand for rare earth metals. The pressure for more supply may require ocean floor mining, which will incur another stress on the ocean and on global warming by resuspending carbon previously sequestered in marine sediments, heavy metal contamination of marine food webs, and biodiversity loss. Increasing demand for rare earth metals could have a profound effect on public health (Hamley, 2022). BOEM needs to consider the environmental costs of mining rare earth metals in the overall assessment of the project’s environmental impacts.	The EIS assesses the potential environmental, social, economic, historic, and cultural impacts that could result from the construction, operation, maintenance, and eventual decommissioning of the Sunrise Wind Project proposed by Sunrise Wind in its COP. The EIS will inform BOEM in deciding whether to approve, approve with modifications, or disapprove the COP. The Final EIS is not a final decision document, but rather considers the potential impacts that could result from the Proposed Action. In the proposed Project, Sunrise Wind is not proposing actions related to mining to gather the materials needed for wind turbines. The potential environmental impacts related to mining rare earth metals is considered in other processes and in proposals related to that occurring. This is not a part of the Proposed Action by the Applicant, and therefore, is not described in this EIS.
BOEM-2022-0071-0248-0037	A finding of major impacts to scientific research and surveys (Sunrise DEIS p. ES-xii, CVOW DEIS p. S-14) cannot be downplayed and the proposed mitigation measures do not provide reassurance that our future understanding of the biological resources will not be gravely hindered. Any reduction of, or impact to, fisheries surveys will likely result in increased	The potential disruption of NMFS marine resource survey operations is noted within the Presence of Structures IPF in the Final EIS. Potential impacts associated with this interruption could be increased uncertainty in stock assessments and changes in the fishery quotas based on existing fishery management council rules.

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	uncertainty for stock assessments, leading to changes to fisheries management and reduction in allowable catch. BOEM and NMFS must immediately work to implement strategic plans as soon as possible to minimize any 'lost time' between existing surveys and future adapted surveys.	



**O.6.17. Recreation and Tourism**

**Table O-26. Responses to Comments on Recreation and Tourism**

Comment No.	Comment	Response
BOEM-2022-0071-0232-0023	RI takes enormous pride in its boating and recreational fishing eminence. Sunrise Wind and the other OWFs slated for the coastal waters of RI will substantially impact the boating industry, whale watching, and fishing as RI Sound becomes noisy and more difficult to navigate (NOAA, McCann, 2013). Sunrise Wind, by displacing these activities, violates the Outer Continental Shelf Lands Act (43 U.S.C. §§ 1331 et seq.). The BOEM DEIS does not adequately address either the legal, monetary or cultural impact of this adverse effect.	Vessel traffic is analyzed under Section 3.19, <i>Navigation and Vessel Traffic</i> , and impacts can then be carried into Section 3.21, <i>Recreation and Tourism</i> , and Section 3.14, <i>Commercial Fisheries and For-hire Recreational Fishing</i> . <i>Commercial Fisheries and For-hire Recreational Fishing</i> now provides tables summarizing revenue exposure by port and state. Traffic impacts and mitigation strategies to alleviate them are discussed in <i>Recreation and Tourism</i> . However, the <i>Recreation and Tourism</i> section does not delve into the financial implications associated with these impacts.
BOEM-2022-0071-0249-0005	The DEIS contains no analysis of how heritage tourism will be affected even though our clients depend on it for the current and future maintenance and preservation of the historic properties under their jurisdiction or control. Under NEPA, BOEM must consider a wide range of effects, specifically including impacts that are “historic, cultural, [and] economic.” Tourism revenue and property values are vital to the Town of New Shoreham’s and City of Newport’s economy. Tourism alone is a \$7.1 billion industry in Rhode Island, supporting over 87,800 jobs every year. Spoliation of historic landscapes increases the risk of lost tourism revenue and property taxes, which are expected to decrease after Sunrise Wind, Revolution Wind, and South Fork Wind industrialize the ocean landscape	Section 3.15, <i>Cultural Resources</i> , reviews the Project impacts to the significance and integrity of historic properties. Tourism and socioeconomic impacts are discussed in Sections 3.21 and 3.16, respectively. Additionally, Section 3.22 discusses scenic and visual resources and describes impacts to the character of the seascape.  Impacts were determined to have negligible to moderate adverse and minor beneficial impacts on recreation and tourism. Construction activities may cause the need to adjust recreation and tourism activities due to disruptions, construction activities, and partial closures of recreational areas. All recreation areas will be accessible to the public during

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	<p>with their unavoidable visual clutter and light. Impacts to our clients' tourism economies would be devastating to the economic health of the area and put tens of thousands of jobs at risk, creating environmental justice risks. BOEM's own numbers about the GDP of Newport County and Washington County suggest that economic harm could be even greater. Nevertheless, the DEIS does not consider it.</p>	<p>operation and maintenance activities. Impacts were considered based on specific areas.</p>
<p>BOEM-2022-0071-0249-0006</p>	<p>Despite this risk, the DEIS' discussion of tourism blithely dismisses potential impacts to Block Island's and Newport's economies without any serious discussion or supporting research, preferring instead to rely on flawed, incomplete studies and ignoring Orsted's own research that shows that 15% of tourists will not return to oceanfront communities once offshore wind farms are built. Thus, BOEM cannot support its conclusion that the overall impact to tourism will be "minor," especially when Project impacts at the landscape level are expected to range from "moderate" to "major adverse." BOEM must carefully consider the impacts on our clients' unique character as oceanfront communities and their historic properties that qualify as a "resource" both to the area's economy and under NEPA's definition. BOEM must further analyze and quantify these potential adverse effects as BOEM develops the Final EIS.</p>	<p>Section 3.15, <i>Cultural Resources</i>, reviews the Project impacts to the significance and integrity of historic properties. Tourism and socioeconomic impacts are discussed in Sections 3.21 and 3.16, respectively. Additionally, Section 3.22 discusses scenic and visual resources and describes impacts to the character of the seascape.</p> <p>Minor adverse impacts are defined as "impacts [that] would not disrupt the normal functions of the affected activities and communities." Moderate adverse impacts are defined as "the affected activity or community would have to adjust somewhat to account for disruptions due to the project." Impacts were determined to have negligible to moderate adverse and minor beneficial impacts on recreation and tourism. Construction activities may cause the need to adjust recreation and tourism activities due to disruptions, construction activities, and partial closures of recreational areas. All recreation areas will be accessible to the public during operation and maintenance activities. Impacts were considered based on specific areas.</p>

**O.6.18. Sea Turtles**

**Table O-27. Responses to Comments on Sea Turtles**

Comment No.	Comment	Response
BOEM-2022-0071-0242-0023	Abundance Estimates for Sea Turtles: New sea turtle density models are due for imminent release by the Navy and are available to inform environmental impact analyses upon request; BOEM should request these data from the Navy and use that information to update estimates for the Project Area.	Sea turtle density estimates for SRWF were derived from the new models and added to Table 3.12-1.
BOEM-2022-0071-0242-0026	For sea turtles, BOEM has determined through its impact analysis that impacts will be “negligible to minor adverse impacts.” BOEM’s determination is based on the potential for the presence of offshore wind structures to be beneficial to individual sea turtles due to the creation of artificial reefs, additional foraging habitat, shelter from predation and strong currents, as well as additional opportunities to remove biological build-up on their carapaces. However, this assumption should be validated through appropriate monitoring and research. We also urge BOEM to carefully consider how these benefits are counterbalanced by adverse impacts from pile driving noise and increased vessel traffic.	Adverse and beneficial impacts have been weighed separately. Specifically, BOEM does not consider the possibility of beneficial effects to offset the adverse impacts. Adverse impacts must be properly avoided or mitigated regardless of the potential for beneficial impacts. This provides a conservative (protective) approach. Estimating the potential for offsetting effects from beneficial impacts is beyond the scope of the Proposed Action.

Comment No.	Comment	Response
BOEM-2022-0071-0242-0027	<p>In its description of the Proposed Action, the DEIS states that between one and three piles may be installed per day with between 1-4 hours of impact pile driving expected per pile under normal substrate conditions. However, the acoustic impact analysis for marine mammals and sea turtles uses a different set of assumptions. For example, the pre-start clearance zones are based on the modeling assumption that either one or two monopiles, and either two or three pin piles are driven per day. The modeling scenarios used to estimate impacts to marine mammals are different again, assuming the installation of two to four pin piles and one to four monopiles per day. To determine radial distances to effect levels for sea turtles, up to four monopiles and four pin piles installed in a single day were modeled. These inconsistencies leave the results of the impact analysis and appropriateness of the size of the pre-start clearance and shutdown zones in serious question. BOEM must revise its analysis so that it is consistent and reflects the true project design envelope.</p>	<p>Acoustic modeling included in the EIS is based on the potentially most impactful set of parameters among modeled scenarios, based on the range of potential construction scenarios proposed in the COP. As described in the PSMMP for sea turtles and ESA-listed fish species, the pre-clearance and shutdown zones are based on the range to potential PTS injury with a buffer. As described in the PSMMP for marine mammals and sea turtles and listed-fish species, NMFS approved changes to pre-clearance and shutdown zones may be requested and incorporated based on updated information or sound source verification data that is required as part of the proposed action. We will edit the language describing the modeling for consistency and clarity.</p>

**O.6.19. Scenic and Visual Resources**

**Table O-28. Responses to Comments on Scenic and Visual Resources**

Comment No.	Comment	Response
BOEM-2022-0071-0232-0021	The 968-foot-tall wind turbines will be much more visible than the company’s simulations imply and will flash red lights during the night. Human visual processing enlarges objects on the horizon. This phenomenon, called the Ponzo illusion, explains why a full moon rising on the horizon appears much larger than the same moon, once it is overhead (Gregory, 2013). Humans will experience the turbines as far more sizable than the simulations convey. Human visual processing also pays more attention to moving objects than stationary ones. As a result, humans will be keenly aware of these structures on the horizon. BOEM has not adequately considered the visual impact.	BOEM has determined that the visual simulations prepared by the Lessee are adequate for assessing visual impacts. BOEM does not intend to prepare any additional simulations or media. The EIS summarizes previously prepared technical reports to aid the reader in the understanding of resource impacts. COP Appendix Q1, <i>Visual Impact Assessment</i> further outlines the methodology associated with the development of the simulations as part of the technical report and subsequent findings.
BOEM-2022-0071-0232-0022	RI and the nation as a whole suffer from a mental health crisis and increased drug abuse. Encounters with nature improve both mental and physical health by providing a sense of awe (Lopes, 2020; Chirico, 2021, Monroy, 2022). Compromising the ocean’s natural state will potentially exacerbate the country’s mental health problems by destroying a source of visual peace and open space. BOEM has failed to take this adverse impact into its analysis.	BOEM has considered the potential impacts from the presence of both onshore and offshore structures in the visual GAA (Section 3.22) and has determined that the presence of these structures would affect the character of the seascape, open ocean, landscape character, and viewer experience. The magnitude of impact is defined by the noticeable features; distance and field of view (FOV) effects; view framing and intervening foreground; and the form, line color, and texture contrasts, scale of change, and prominence in the characteristic seascape, open ocean and landscape.
BOEM-2022-0071-0249-0014	The visual simulations BOEM provided for review are incomplete and inadequate. As a result, they fail to show	BOEM has determined that the visual simulations prepared by the Lessee are adequate for assessing visual

Comment No.	Comment	Response
	<p>the actual impact of Sunrise Wind. Consequently, BOEM must include additional simulations to assess accurately adverse impacts and to determine appropriate avoidance, minimization, or mitigation measures. As the lead federal agency, BOEM must provide consulting parties and the public with adequate and easily accessible information that informs all parties of potential impacts. BOEM’s adverse effect characterizations and visual simulations are too limited to show the full extent of Sunrise Wind’s aesthetic impacts. BOEM and consulting parties, therefore, are operating at an informational disadvantage that assures arbitrary and capricious decision making.</p>	<p>impacts. BOEM does not intend to prepare any additional simulations or media. The EIS refers to previously prepared technical reports to aid the reader in the understanding of resource impacts. COP Appendix Q1, <i>Visual Impact Assessment</i> further outlines the methodology associated with the development of the simulations as part of the technical report and subsequent findings.</p>
<p>BOEM-2022-0071-0249-0016</p>	<p>Adding to the problem of insufficient visual simulations from historic properties, including all NHLs, BOEM’s visual simulations are taken only at a single time of day during a single season. They represent a small fraction of adversely affected historic properties. They do not show construction impacts. And all simulations are from a single vantage at ground level, even though property owners, the public, and visitors to those properties experience the historic ocean viewshed from different vantage points, such as from the tops of lighthouses, church steeple balconies, widow walks, or the upper stories or verandahs of houses—spaces designed intentionally for this type of observation.</p>	<p>BOEM has determined that the visual simulations prepared by the Lessee are adequate for assessing visual impacts. BOEM does not intend to prepare any additional simulations or media. The EIS refers to previously prepared technical reports to aid the reader in the understanding of resource impacts. COP Appendix Q1, <i>Visual Impact Assessment</i> further outlines the methodology associated with the development of the simulations as part of the technical report and subsequent findings.</p>
<p>BOEM-2022-0071-0249-0017</p>	<p>Overall, as we have previously explained in earlier comments, the visual simulations provide a “best case” representation only of the Project’s visual impacts. BOEM does not provide enough information for the</p>	<p>Appendix Q1 of the COP (EDR 2022), <i>Offshore Visual Impacts Assessment</i>, states, "The VIA was prepared with oversight and input provided by landscape architects and other visual professionals experienced in the</p>

Comment No.	Comment	Response
	Newport Parties and Block Island Parties, or other consulting parties, to evaluate less favorable scenarios.	preparation of VIAs. It is also consistent with the policies, procedures, and guidelines in established VIA methodologies, and in accordance with the Visual Impact Assessment Study Plan." The visual simulations were prepared based on the PDE approach, which considers a geographic area that is larger than what will ultimately be required for the development of the Project. This approach allows developers to account for locations within the PDE that are unsuitable for development due to constructability, cultural, or economic limitations. The PDE includes the contiguous areas closest to the mainland shoreline and therefore represents the greatest level of potential visual impact associated with the Project.
BOEM-2022-0071-0249-0018	Furthermore, BOEM has not fully shown consulting parties or the public how Sunrise Wind will address potential lighting impacts, including during the construction phase. Prolonged, constant, and bright lights will be required to construct the WTGs, as well, and this lighting will cause major impacts to our clients' views for at least close to a decade when all of Orsted's projects are considered cumulatively. BOEM must include construction impacts, including lighting, in its final analysis of impacts to historic properties so that consulting parties and the public can evaluate them. Our clients are especially concerned about lighting impacts to the dark night sky both during and after construction and urge BOEM to take a hard look at these impacts. In addition, BOEM must consider the visual impacts of all light units on each turbine and their reflections on the	The visual resource analysis addresses non-historic visual resources and states, "When the lights are on, it would result in a major impact within the range of the viewer, but when the lights are off there would be no impact from them." Impacts would be dependent on the distance, presence of existing onshore and offshore light sources, meteorological conditions, and angle of view. BOEM has addressed construction lighting in the Final EIS. Section 3.15.5.1.2 addresses construction lighting for the Proposed Action. The text notes that construction lighting will be variable based on location and distance and that this will change over the course of construction as work moves throughout different portions of the Lease Area. The text further notes that impacts would be limited to those cultural resources for which a dark nighttime sky is a contributing element, a

Comment No.	Comment	Response
	ocean's surface, especially during nighttime hazy conditions that will magnify their glow—and how nighttime light pollution will further diminish the integrity of all historic properties and NHLs within the APE.	smaller subset of reviewed cultural resources. The text concludes that since the lighting is temporary and will change throughout the construction period, the impacts are minor.



### O.6.20. Water Quality

**Table O-29. Responses to Comments on Water Quality**

Comment No.	Comment	Response
BOEM-2022-0071-0229-0013	<p>Water Quality/Fisheries Impacts: BOEM’s analysis, or lack thereof, pertaining to the proposed open cooling water intake system for the Project’s offshore converter station (OCS-DC) as an “impact producing factor” affecting water quality is truly remarkable. Page 3-37 of the DEIS states that “Table G4 in Appendix G identifies potential IPFs, issues, and indicators to assess impacts to water quality”. However, upon visiting Appendix G, Section 1.1.2 Water Quality, the reader is led to a simple Table G-4 “Potential Impact Producing Factors on Water Quality”, the contributing IPFs include accidental releases, anchoring, cable emplacement and maintenance, discharges, land disturbance, port utilization, presence of structures.” There is no analysis contained in the Appendix. Neither is there any real analysis contained in the DEIS.</p>	<p>Thank you for the comment. Further analysis regarding the cooling water intake system is provided in Sections 3.5.5.2 <i>Water Quality, Operations and Maintenance</i>; 3.7.5.2.2 <i>Benthic Resources, Operations and Maintenance, Offshore Activities and Facilities</i>; and 3.10.5.2.2 <i>Finfish Invertebrates and Essential Fish Habitat, Operations and Maintenance, Offshore Activities and Facilities</i>.</p>
BOEM-2022-0071-0229-0014	<p>The section of the DEIS that discusses the operation of the OCS-DC states that the daily design intake flow of the OCS-DC would be 8.1 million gallons per day, with maximum daily discharge of 90 degrees F. It briefly discusses thermal plume size, location, modeling, and mixing estimates, but every assertion is referenced to “TRC 2021”. Upon examination of the DEIS Appendix K: References Cited, this reference correlates to “TRC Companies, Inc. (TRC). 2021. NPDES permit application. Sunrise Wind offshore converter station. December</p>	<p>Thank you for the comment. Currently, open-loop cooling systems are the only commercially available, effective, and reliable method for AC to DC conversion at long distances from shore and are required to be permitted through the NPDES system (Middleton and Barnhart 2022). It is an area of ongoing investigation. Sunrise Wind has applied for an NPDES Permit under Section 402 and Section 316(b) of the Clean Water Act to operate the Offshore Converter Station, including a cooling water intake system. The results from the</p>

Comment No.	Comment	Response
	<p>2021". Therefore, BOEM relies completely on a document prepared by the developer themselves. This is inappropriate; independent analysis is necessary. In order to review the application document cited, we also consulted Appendix A: Required Environmental Permits and Consultations", which merely mentions that the project would require a NPDES permit from the EPA but contains no permit documentation pertaining to this permit/permit application. In Appendix N2 of the COP, we can find a 2022 document prepared by the developer entitled "Ichthyoplankton Entrainment Assessment", but as that document is dated 2022 not 2021, it is difficult to tell if this is the document referenced by the DEIS in the Water Quality section.</p> <p>Therefore, it is impossible to comment on the sole document and rationale that BOEM has provided for a very major impact to the environment. BOEM conducts no analysis itself, other than to regurgitate a developer document. It references no other studies pertaining to impacts of open cooling water intake systems, which are now banned in New York State waters due to the devastating environmental impacts produced by such systems. It is difficult to see how New York State would approve a project that would violate their own regulations if placed in state waters. And it is difficult to see how BOEM can estimate the impacts from this type of system- banned in the very state requesting the project- when it refers to no documentation or environmental studies other than the developer</p>	<p>hydrothermal modeling completed for the permit application are discussed in Section 3.5.5.2 (previously section 3.4.2.5.2 in the Draft EIS). The hydrothermal modeling estimated that the thermal plume would not extend beyond the regulatory mixing zone of 330 ft (100 m) as defined by the Ocean Discharge Criteria in the NPDES regulations; thus, effects on water quality beyond the regulatory mixing zone are not anticipated. The OCS-DC will be operated according to the requirements of the NPDES Permit. The OCS-DC is located on the Outer Continental Shelf and is not within the regulatory authority of New York State.</p>

Comment No.	Comment	Response
	<p>themselves. There are environmental reasons that these systems are now outlawed in many other locations. But none of these have made it into BOEM’s analysis. Therefore, BOEM conducted no analysis. We request that BOEM explore scientific and environmental analyses that pertain to open cooling water intake systems on the marine environment and publish this analysis/literature review in a supplemental EIS.</p> <p>This is particularly important regarding water quality as it affects fishery resources. For example, in Southern California alone, open cooling water intake systems have been estimated to cost the fishing industry over \$9 million a year (in 2005 dollars), which is an underrepresentation of true impacts as only 20 of 258 species affected were important to the fishing industry. If the California Energy Commission can provide such an analysis, then a major federal agency such as BOEM could also conduct such an analysis to estimate the biological and fishery impacts of the Proposed Project. We request that BOEM do so and provide that analysis in a supplemental EIS for further public comment.</p>	
BOEM-2022-0071-0229-0017	<p>The lack of any species specific or substantial analysis in the DEIS regarding the OCS-DC is deafening, even in basic terms without detailed fisheries/stock analysis. BOEM’s section 3.4.2.5.5 Conclusions on Impacts from the Proposed Action state that impacts on water quality would be negligible or minor based on “sediment suspension, deposition and increased turbidity” during “during anchoring, cable emplacement and</p>	<p>Thank you for the comment. Currently, open-loop cooling systems are the only commercially available, effective, and reliable method for AC to DC conversion at long distances from shore and are required to be permitted through the NPDES system (Middleton and Barnhart 2022). It is an area of ongoing investigation. Sunrise Wind has applied for an NPDES Permit under Section 402 and Section 316(b) of the Clean Water Act</p>

Comment No.	Comment	Response
	<p>maintenance, and seafloor/land disturbance” but that sediment plumes would be “localized and short term.” The conclusion also states that should an accidental release of oil/lubricant/debris, etc. to occur, the impacts would be “minor to moderate” but also only “short term”. The Conclusions section on Water Quality completely omits any conclusion or impact analysis from the OCS-DC of 8.1 million gallons per day of 90 degree F effluent.</p> <p>This is truly astonishing for the most major water quality impact producing factor of the proposed Project. This is clearly not an accidental omission by the agency, as such an obvious and significant omission could only be made intentionally. Open cooling water intake systems have been the subject of much litigation from environmental groups over the years, as well as the subject of environmental group discourse on power plant modernization, due to the tremendous environmental impact that such systems have on the aquatic environment and aquatic species. Data for similar impacts exist and should be utilized in an independent analysis by the agency.</p> <p>In fact, BOEM’s Table ES-2 entitled “Summary and Comparison of Impacts among Alternatives with No Mitigation Measures” lists the same impacts to water quality for the No Action Alternative as for the Proposed Action Alternative. This is completely preposterous and fails even the most basic redface test. Not having an</p>	<p>to operate the Offshore Converter Station, including a cooling water intake system. The results from the hydrothermal modeling completed for the permit application are discussed in Section 3.5.5.2 (previously Section 3.4.2.5.2 in the DEIS). The hydrothermal modeling estimated that the thermal plume would not extend beyond the regulatory mixing zone of 330 ft (100 m) as defined by the Ocean Discharge Criteria in the NPDES regulations; thus, effects on water quality beyond the regulatory mixing zone are not anticipated. The OCS-DC will be operated according to the requirements of the NPDES Permit.</p>

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	<p>open cooling water intake system cannot have the same impacts to water quality as having an open cooling water intake system that releases 8.1 million gallons of 90 degree F effluent per day. We note again that no other projects proposed thus far via the DEIS process have applied for or evoked the need for an open cooling water intake system offshore converter station. Therefore, this type of impact would not even exist, not even in a cumulative impacts analysis, except for the proposed Project.</p>	
<p>BOEM-2022-0071-0232-0013</p>	<p>As mentioned above, considering the Executive Order's dictum to tackle the climate crisis both at home and abroad, the DEIS does not adequately consider the global implications of the project's effect on ocean currents, wave height, and temperature stratification. BOEM knows that these offshore wind projects will decrease wave height, diminish current strength, and alter temperature stratification from its hydrodynamic modeling study (HDM, BOEM_2021-049). These changes could alter both the Atlantic Meridional Overturning Circulation (AMOC) and the Gulfstream. Because any decrease in the Gulfstream or the AMOC can have dramatic effects on sea-level rises (Goddard 2015), and global weather patterns (Carrington 2021), BOEM should not accept the DEIS until these hydrodynamic changes are considered in a global context, as the executive order implies.</p>	<p>The Final EIS discusses the effects from the presence of wind turbines on water mixing patterns and water quality in Sections 3.5.3.2 and 3.5.5.2 (previously 3.4.2.3.2 and 3.4.2.5.2 in the Draft EIS).</p>

Comment No.	Comment	Response
BOEM-2022-0071-0232-0014	<p>Increased stratification and temperature changes described by the HDM studies will alter both the amount and the timing of plankton blooms. This can have downstream effects on migratory species that arrive in exquisite timing with seasonal blooms. Studies from both China and the North Sea demonstrate that offshore wind projects can reduce plankton counts (Daewel, 2022), decrease biodiversity (Wang, 2022), and alter the distribution of plankton blooms (Slavik, 2018). A mere 1% decrease in phytoplankton will cause an increase in CO2 emissions that outweighs any possible benefit from renewable energy sources (Malerba, 2019). The Sunrise Wind DEIS calculates the construction and installation will kill billions of plankton. BOEM does not adequately consider the cumulative effect, the interactions between primary production and other species, the impact of primary production on CO2 emissions and O2 production (Falkowski, 2012), nor does it incorporate the latest scientific findings from the North Sea and China. Please rectify this omission.</p>	<p>The Project may result in localized changes in plankton production. But as stated in the paper cited by the commenter (Daewel et al. 2022), these changes can be up to +/- 10 percent locally but less than +/-1 percent in the area surrounding the wind farm, with local oceanographic factors playing a role in the change. Specifically, according to Daewel et al. (2022), "In these regions it is difficult to conclude on the overall trophic response, since the average fractional change in biomass is very small and shows a large regional variation." Temperature stratification is discussed in Sections 3.5.5 <i>Water Quality</i>, 3.10.5 <i>Finfish</i>, and 3.11.5 <i>Marine Mammals</i>.</p>
BOEM-2022-0071-0232-0024	<p>First the construction and installation and then the tidal and estuary currents flowing across the underwater portion of the wind turbines can resuspend toxic heavy metals (Chen, 2022), re-introducing them into the food supply chain, and threatening marine mammals (Huang, 2022). Toxic compounds, since the time of the industrial revolution, have settled in the lease areas off Rhode Island. Bioaccumulation and biomagnification can increase the potential harm these compounds can cause. As a result, Sunrise Wind will potentially violate</p>	<p>There are no known ocean disposal sites along the cable route or in the SRWF Project Area as mentioned in Section 3.5.5.1.2 and 3.20.1.1.</p> <p>The USEPA's Ocean Disposal Map is located at the following link: <a href="https://www.epa.gov/ocean-dumping/ocean-disposal-map">https://www.epa.gov/ocean-dumping/ocean-disposal-map</a>.</p>

Comment No.	Comment	Response
	<p>the Clean Water Act (33 U.S.C §§ 1251 et seq.) and Seafood Safety Regulations (21 C.F.R. § 123). The BOEM DEIS does not incorporate the latest scientific findings, nor does it consider the legal implications or the significant health consequences of resuspending toxic compounds in this area.</p>	
<p>BOEM-2022-0071-0232-0025</p>	<p>In addition to the resuspension of toxic compounds, the DEIS does not consider the cumulative impact and the interactions between other aspects of the project that will degrade water quality. The anti-corrosive coating on the wind turbines will leach significant levels of toxic heavy metals (lead and cadmium) (Reese, 2020) into the water. Leading edge erosion emits microplastics containing Bisphenol A (BPA) and “forever” per- and polyfluoroalkyl substances (PFAS) into the water which can then contaminate the marine food chain. Contaminating water in an area essential to fishing may violate the Clean Water Act (33 U.S.C §§ 1251 et seq.) and Seafood Safety Regulations (21 C.F.R. § 123). The BOEM DEIS does not adequately address this significant impact on the marine environment and on human health. <a href="https://docs.wind-watch.org/Leading-Edge-erosion-and-pollution-from-wind-turbineblades_5_july_English.pdf">https://docs.wind-watch.org/Leading-Edge-erosion-and-pollution-from-wind-turbineblades_5_july_English.pdf</a></p>	<p>The potential influence of corrosive emissions from offshore infrastructure is discussed in Section 3.5.3.2. The limited research conducted to date has shown that while corrosive emissions may occur, the amount and effect varies with site (e.g., local salinity and water quality conditions). For example, the 'Chemical Emissions from Offshore Wind Farms' study in the North Sea found that (1) detected concentrations of metals (e.g., aluminum, zinc, indium, lead, cadmium) were sporadically high but that concentrations were predominantly within the range of normal variability and that (2) based on the prevailing dilution and distribution processes in the North Sea, there were no discernible effects due to the use of galvanic anodes (BSH and Hereon 2022). Epoxy resins containing Bisphenol A (BPA) are one of many types of potential coatings for wind turbines. However, there is insufficient data currently available to evaluate its potential effect on the environment. Federal agencies, such as the EPA, are currently evaluating the impacts of BPA and polyfluoroalkyl substances (PFAS) and developing regulations.</p>

Comment No.	Comment	Response
BOEM-2022-0071-0232-0026	<p>Wind farms can increase water and air temperatures, redistribute humidity, and alter atmospheric flow, thereby modifying local weather patterns and regional climate (Miller, 2018). Raising ambient temperatures can affect fish larvae (Moyano, 2017), ocean currents (Christiansen, 2022), and vegetation (Diffendorfer, 2022). The BOEM DEIS does not consider the latest scientific findings, nor does it adequately address this significant issue. Assuming that climate change will do worse is not a valid justification for known and significant impacts.</p>	<p>Thank you for your comment. Information on the influence of wind turbines/structures on the hydrodynamic conditions within an offshore wind farm is included in Section 3.5.5.2, <i>Water Quality</i>, and has been added to 3.10.5.2, <i>Finfish, Invertebrates, and Essential Fish Habitat</i>, and Section 3.11.5.2, <i>Marine Mammals</i>.</p>
BOEM-2022-0071-0248-0042	<p>The proposed action, and each of the alternatives, includes an offshore converter station (OCS). There will be interarray cables, proposed to be buried at 3 - 7 foot depths, transmitting AC power from the turbines to the OCS. The AC power will be converted to DC power before being transmitted ashore. During operation, the OCS requires continuous cooling water withdrawals and subsequent discharge of heated effluent back to the receiving waters. Three intake pipes are proposed to be positioned 30 feet above the seafloor. Each intake pipe opening will be 21.6 square feet and have a downward orientation. One outflow pipe is proposed and will be positioned 40 feet below local mean sea level. The outflow pipe will also have a downward orientation and the total discharge opening is 5.4 square feet.<sup>32</sup> The maximum daily average discharge temperature would be 90oF, and the daily average discharge temperature would be 86oF. While the maximum inflow and outflow volumes are 8.1 million gallons per day (MGD), it is expected the daily intake flow would range from 4.0 to</p>	<p>Thank you for the comment. Currently, open-loop cooling systems are the only commercially available, effective, and reliable method for AC to DC conversion at long distances from shore and are required to be permitted through the NPDES system (Middleton and Barnhart 2022). It is an area of ongoing investigation. Sunrise Wind has applied for an NPDES Permit under Section 402 and Section 316(b) of the Clean Water Act to operate the offshore converter station, including a cooling water intake system. The results from the hydrothermal modeling completed for the permit application are discussed in Section 3.5.3.2. The hydrothermal modeling estimated that the thermal plume would not extend beyond the regulatory mixing zone of 330 ft (100 m) as defined by the Ocean Discharge Criteria in the NPDES regulations; thus, effects on water quality beyond the regulatory mixing zone are not anticipated. The OCS-DC will be operated according to the requirements of the NPDES Permit. Please note the burial depth for the IAC has changed from 3 to 7 ft</p>



Comment No.	Comment	Response
	<p>5.3 MGD. Based on modelling, the DEIS forecasts “some highly localized increases in water temperature in the immediate vicinity of the discharge location of the OCS”. Without much analysis, the DEIS concludes that impacts from the thermal plume (heated effluent) are expected to be minor. It is telling that NO other project for which a DEIS has been prepared proposes to utilize an offshore converting station. We recommend additional analysis and justifications for BOEM’s finding of minor impacts from the thermal plume.</p>	<p>(0.9 to 2.1 m) to 4 to 6 ft (1.2 to 1.8 m) based on the newest COP published in September 2023 (Sunrise Wind 2023b).</p>
<p>BOEM-2022-0071-0248-0043</p>	<p>Similarly, the DEIS glosses over the role chlorine will play in the cooling process. “The chlorine proposed to be added to the cooling water during normal operation would dissipate prior to discharge.” This appears to be the only reference to chlorine included in the DEIS and COP. If Sunrise intends to mix chlorine in the cooling water, more details are necessary to effectively comment. For example: what levels of chlorine are expected? What safeguards will be in place to contain chlorine should it not dissipate prior to discharge?</p>	<p>Additional information regarding the electro chlorination system was added to Section 3.5.7.2.2.</p>

**O.6.21. Wetlands and Waters of the U.S.**

No comments were made on Wetlands and Waters of the U.S. by Stakeholders

**O.6.22. Mitigation and Monitoring**

**Table O-30. Responses to Comments on Mitigation and Monitoring**

Comment No.	Comment	Response
BOEM-2022-0071-0158-0008	Identify which mitigation measures are assumed for the purpose of impacts determinations	All APMs are considered part of the Proposed Action and alternatives, excluding the No Action Alternative. Other mitigation measures developed during the EIS through comments and consultations are listed in Appendix H and at the end of each resource section in Chapter 3.
BOEM-2022-0071-0158-0035	Mitigation measures are necessary to reduce the potential negative environmental and socioeconomic impacts of the Sunrise Wind project. The recommendations outlined in our offshore wind energy policies, referenced above, should be reflected as terms and conditions for approval of the project. We provided a separate comment letter on the draft Guidelines for Mitigating Impacts to Commercial and Recreational Fisheries. These comments supported many of the mitigation measures recommended in that draft guidance. We recommend that all final mitigation guidelines be reflected in terms and conditions for BOEM’s approval of this project. This is especially important given the DEIS only states that “the lessee shall implement a gear loss and damage compensation program consistent with BOEM’s draft guidance...” (page H-67). Furthermore, there is reference in Appendix H that Ørsted’s corporate policy and procedure will be implemented to compensate for any commercial/recreational fishing entities gear loss, however, this policy is not hyperlinked or provided.	BOEM has reviewed the Council's wind policy referenced and concurs with the content of the document. BOEM also finds that the document is consistent with the approach of the EIS with respect to stakeholder engagement, BMPs, and environmental review considerations (e.g., navigation and safety, evaluation of impacts on fisheries). Therefore, no changes to the EIS are needed.

Comment No.	Comment	Response
BOEM-2022-0071-0158-0036	<p>Appendix H includes the analyzed potential mitigation and monitoring measures; however, it is unclear which of these measures are likely to be required by BOEM as opposed to optional. Assumptions about which mitigation measures are required will affect the impact determinations and overall conclusions in the FEIS. For example, time of year restrictions on construction can be used to protect sensitive spawning and fishing periods. This is being proposed for the summer flounder HAPC (page H-10), which the MAFMC designated as all native species of macroalgae, seagrasses, and freshwater and tidal macrophytes in any size bed, as well as loose aggregations. In addition, “time-of-year in-water restrictions to the extent feasible to avoid or minimize impacts to Atlantic sturgeon” are included as mitigation measures (page H-10), though it is not clear what type of monitoring and minimization plans will be put in place. The Councils are supportive of time of year restrictions to reduce potential impacts to sensitive life stages of fishery species, to reduce impacts to fisheries, and to avoid impacts to submerged aquatic vegetation and other structured habitats throughout the project area and cable route. However, further detail should be provided in the FEIS on how this would be done and what exactly these measures would achieve. We recommend working with NOAA Fisheries on impact determinations and identification of sensitive habitats and fishing periods to avoid as ways to mitigate impact.</p>	<p>Thank you for your comment. APMs (Table H-1 in Appendix H) are included in the analysis and impact determination for the Proposed Action and alternatives, with the exception of the No Action Alternative. Other mitigation measures proposed by agencies or BOEM are included in Table H-2 to Table H-3 and would include additional mitigations that can further reduce the impacts on resources. These additional measures will be identified for implementation in the Record of Decision. Mitigation and monitoring measures required through permits (Section H.4 in Appendix H) will be required if permits are approved and the Project is approved for development.</p>

Comment No.	Comment	Response
BOEM-2022-0071-0158-0038	<p>The Councils are also concerned with the scour protection measures included within the DEIS (e.g., rock placement, mattress protection, sandbags, and stone bags). Per the Council’s offshore wind energy policy, we recommend that if scour protection or cable armoring is needed, the materials should be selected based on value to commercial and recreational fish species. Natural materials, or materials that mimic natural habitats, should be used whenever possible. These materials should not be obtained from existing marine habitats and must not be toxic.</p>	<p>Thank you for your comment, a mitigation measure has been included in Appendix H which states, "To minimize the impacts of habitat conversion from scour protection, natural or engineered rounded stone of consistent grain size, that mimics natural seafloor substrates, should be used. At a minimum, any exposed surface layer should be designed and selected to provide three-dimensional structural complexity that creates a diversity of crevice sizes (e.g., mixed stone sizes) and rounded edges (e.g., tumbled stone), and be sloped such that outer edges match the natural grade of the seafloor. Should the use of concrete mattresses be necessary, bioactive concrete (i.e., with bio-enhancing admixtures) should be used as the primary scour protection (e.g., concrete mattresses) or veneer to support biotic growth."</p>
BOEM-2022-0071-0158-0039	<p>The DEIS states that the developer will include ways “to mitigate operational impacts on oceanographic high-frequency radars” (page H-51). The fishing industry has proven to be adaptable in the face of change; however, more deliberate mitigation measures that support vessel radar upgrades could minimize impacts to fishermen and others navigating through and around the project area. An adaptation fund is included within the mitigation measures identified in the Empire Wind DEIS. We recommend a similar fund for Sunrise Wind to support vessel radar upgrades and training to help minimize impacts to fisheries and others navigating through and around the project area.</p>	<p>In the revised COP (September 27, 2023), Sunrise Wind added an EPM that confirms that “Sunrise Wind will establish a ... Navigation Safety Fund”. See Table ES-1, Section 4.7.4.3, and Table 4.9-1 in the COP.</p> <p>Sunrise Wind provided additional information regarding this fund to BOEM in response to Requests for Interest (RFIs) on July 12, 2023, and May 12, 2023. That information is copied below for reference. Final measures have been incorporated within NYSDOS (received August 24, 2023), Rhode Island Coastal Resources Management Council (received September 7, 2023), and Massachusetts Office of Coastal Zone Management’s (received October 6, 2023) Coastal Consistency Determinations.</p> <p>The Rhode Island Coastal Resources Management Council and Massachusetts Office of Coastal Zone Management</p>

Comment No.	Comment	Response
		<p>determinations each include a Navigational Enhancement and Training Program Term Sheet, which outline the Program objectives, approach and eligibility, funding/cap, administration, and redemption process. The New York Determination references a Letter of Intent (LOI) executed by Sunrise Wind and NYSDOS to enter into a Memorandum of Understanding concerning certain proposed mitigation measures. The LOI includes an agreement by Sunrise Wind to contribute to an established Navigational Safety Fund to enable commercial fishermen and for-hire vessels to acquire navigation equipment through a grant or voucher system and provide training and experiential learning opportunities to those navigating within the Ørsted/Eversource joint Venture Wind Lease Areas in the Rhode Island/Massachusetts Wind Energy Area. Sunrise Wind and NYSDOS will work collaboratively to determine the best mechanism for Sunrise Wind to contribute to a Navigation Enhancement and Training Program.</p> <p>July 12, 2023, Response to RFI:                      A Navigational Safety Fund will be established within 30 days of receipt of all final federal, state, and local permits, authorizations, concurrences, and approvals necessary to construction and operate the Sunrise Wind Project and will exist until funds run out. The Navigational Safety Fund will enable eligible commercial fishermen and for-hire vessels to acquire navigation equipment through a voucher system and will also provide training and experimental learning opportunities to those navigating within Ørsted/Eversource’s Lease Areas off the coast of Rhode Island and Massachusetts.</p>

Comment No.	Comment	Response
		<p>The Navigational Safety Fund was described in a RFI response provided on May 12, 2023 and will be similar to and carry out the same intent as the program established for South Fork Wind (see Sunrise Wind’s Rhode Island Federal Consistency Decision, pg. 727) and Revolution Wind (see Revolution Wind’s Rhode Island Federal Consistency Decision, pg. 200).</p> <p>May 12, 2023, Response to RFI:                      The Navigational Safety Fund will be in place 30 days after the receipt of all final federal, state and local permits, authorizations, concurrences, and approvals necessary to construct and operate Sunrise Wind as described in the approved COP and will exist until funds run out. The Navigational Safety Fund will enable eligible commercial fishermen and for-hire vessels to acquire navigation equipment through a voucher system. The Navigational Safety Fund will be similar to and carry out the same intent as the program established for South Fork Wind. It will also provide training and experiential learning opportunities to those navigating within Ørsted/Eversource’s lease areas off the coast of Rhode Island and Massachusetts. Fishermen eligible for the Rhode Island and Massachusetts Direct Compensation Programs and who do not already possess AIS transceivers and/or pulse compression radar systems may receive one-time grants for up to \$10,000 in order to upgrade or purchase pulse compression radar or AIS. Commercial fishing vessels and inspected for-hire/party vessels will be eligible for \$10,000 in upgrades and uninspected for-hire vessels will be eligible for \$5,000 in upgrades. Eligible fishermen will be issued vouchers to spend at approved vendors for approved products. The</p>

Comment No.	Comment	Response
		<p>process of issuing vouchers, approving vendors, and approving equipment will be managed by a third party which could be the same third-party managing the Direct Compensation Program. In addition to vessel upgrades, there will be an educational component to the Navigational Safety Fund. Those eligible for direct compensation, may attend a professional training of their choice with support up to \$1,000 per person. Eligible trainings include but are not limited to a captain’s course, license upgrade, radar course, or rules of the road refresher. Like vessel upgrades, a third-party manager will issue vouchers for training and be responsible for approving trainings, trainers, educators, and/or institutions.</p> <p><a href="http://www.crmc.ri.gov/windenergy/dwsouthfork/SFWF_FedConsistencyDecision_20210701.pdf">www.crmc.ri.gov/windenergy/dwsouthfork/SFWF_FedConsistencyDecision_20210701.pdf</a></p>
BOEM-2022-0071-0158-0040	<p>Unexploded ordnances (UXOs) can be uncovered during site preparation activities. Exposed UXO presents a significant risk to mariners, especially those towing mobile gear that could bring UXO to the surface. Offshore wind project construction activities can uncover UXOs. We recommend that the terms and conditions specify that developers are responsible for the safe disposal of UXO exposed due to construction activities. Our understanding is that some UXOs might be detected via surveys but are not exposed; in such cases, only mariner notification may be sufficient given disposal may present greater risks. Clear, timely, and repeated communication about UXO locations and any changes in the location or status of UXOs is essential and should not rely only on email notifications</p>	<p>Sunrise Wind has addressed UXO/MEC disposal in Appendix H. BOEM cannot require disposal of unexploded ordnances. In the event a confirmed UXO/MEC is discovered, the Lessee coordinates with the United States Coast Guard to ensure it is published in the next version of the Local Notice to Mariners.</p>



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BOEM-2022-0071-0158-0041	<p>Appendix H includes mention of a boulder relocation plan that includes 1) identification of active bottom trawl fishing, areas where boulders &gt; 2m in diameter are anticipated to occur, and areas where boulders are expected to be relocated, and 2) identification of methodologies to minimize the number of seafloor obstructions (page H-14). We recommend developing a clear strategy for boulder relocation that is protective of habitats in the area, potentially relocating them to soft bottom directly adjacent to existing hard bottom areas. Mobile gear fishing activity should be considered when planning specific placement options; relocation areas with similar habitat impacts might have higher or lower potential for conflict with trawling and dredging activities. Recreational fishermen often fish on boulder habitats. We recommend that maps post boulder relocation sites be made available to recreational and commercial fishing communities and others.</p>	<p>Prior to inter-array cable corridor preparation and cable installation (e.g., boulder relocation, pre-cut trenching, cable crossing installation, cable lay and burial) and foundation site preparation (e.g., scour protection installation), Sunrise Wind would provide BOEM with a boulder relocation plan for implementation. The plan would include the following:</p> <ol style="list-style-type: none"> <li>1. Identification of areas of active bottom-trawl fishing (within the last 5 years), areas where boulders greater than 2 m in diameter are anticipated to occur, and areas where boulders are expected to be relocated for Project purposes.</li> <li>2. Methods to minimize the number of seafloor obstructions from relocated boulders in areas of active bottom trawl fishing, as identified in #1, as technically or economically feasible.</li> <li>3. Identification of locations of boulders that would be moved and approximately where they would be placed, the method(s) for moving the boulders, and measures taken to minimize impacts, as technically and economically feasible.</li> <li>4. Outreach conducted regarding the boulder relocation plan (e.g., notifications to mariners).</li> </ol>
BOEM-2022-0071-0198-0002	<p>A recent draft report released by the Woods Hole Oceanographic Institution ("WHOI") regarding fishing exposure for Sunrise and Revolution Wind estimates that Sunrise wind will have a total impact on the commercial fishing economy in Massachusetts during the 30-year lifespan of the project of \$4,926,000. This includes an estimated loss of only \$629,000 "from forgone fishing during the wind farm's operation." It is our position that these numbers drastically underestimate the impact of these</p>	<p>Thank you for your comments. BOEM has proposed a fisheries mitigation measure that includes mitigation for potentially impacted shoreside services (see Section 3.14.11, Table 3.14-25 and Appendix H, Table H-3, "Proposed Fisheries Mitigation Measures" under Other Agency-proposed Mitigation Measures), based on BOEM's draft fisheries mitigation guidance. <a href="https://www.boem.gov/renewable-energy/reducing-or-avoiding-impacts-offshore-wind-energy-fisheries">https://www.boem.gov/renewable-energy/reducing-or-avoiding-impacts-offshore-wind-energy-fisheries</a>. BOEM will consider incorporating the fisheries</p>

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	<p>developments, especially during the operational phase.</p> <p>There are serious concerns within the commercial fishing industry about the potential impacts to their livelihoods from the construction and operations of the offshore wind developments. While the offshore wind industry is brand new to the United States and the northeast waters and has yet to become operational, the concerns and uncertainty of the fishermen are certainly justified. It is more than reasonable to expect there will be significant adverse impacts to commercial fishing. Exposure analyses such as these that downplay or seem to suggest negligible impacts can only serve to sow doubt within the commercial fishing industry that their concerns are being taken seriously now and will be acknowledged and addressed when they are experienced in the coming years.</p> <p>We believe that it is vital that the actual impact of the development of offshore wind on the economy and people of Massachusetts be established using the best available data, methods and information to truly measure the impact of this project on our fishing industry and those that support it.</p> <p>Throughout the Sunrise Wind COP DEIS draft, mitigation measures are defined as "best practice, not an enforceable measure." We continue to argue that any appropriate and successful mitigation and compensation program for the commercial fishing industry must codified in Federal law.</p>	<p>mitigation measures as a condition of COP approval.</p>

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	Therefore, it is imperative that all offshore wind developers, federal partners, and fishing industry, collectively advocate for such outcomes.	
BOEM-2022-0071-0205-0025	Pre-construction, construction, and post-construction monitoring should be conducted, especially in areas of known vulnerability such as those adjacent to known sources of contaminants and near environmental justice communities.	Thank you for your comment. Proposed mitigation and monitoring measures, including pre-construction, construction, and post-construction surveys, can be found in Appendix H.
BOEM-2022-0071-0205-0026	The FEIS should include any request made by the community that are publicly available, such as, but not limited to, request for Community Benefits Agreements, port electrification, and community governance of offshore wind projects.	Thank you for your comment. Mitigation and monitoring measures proposed in the commenting process were considered for inclusion in the mitigation and monitoring appendix (Appendix H).
BOEM-2022-0071-0242-0003	We recommend that BOEM include the following in their permitting of Empire Wind: Revise the sound exposure analyses for marine mammals based on a consistent set of assumptions;	The sound exposure analysis is based on the maximum impact scenario of the PDE. The completed analysis addresses the maximum impact for each foundation pile driving type under the PDE.
BOEM-2022-0071-0242-0004	Require a mandatory 10-knot speed restriction for all project-associated vessels at all times;	Thank you for your comment. Appendix H of the Final EIS has been updated to include modifications and/or additional mitigation and monitoring measures that BOEM could choose to incorporate into the Record of Decision. Additional mitigation and monitoring measures may arise from consultations and coordination with federal and state resource agencies. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision. BOEM fully supports regional monitoring and coordination with state and cooperating federal agencies and regional fishery management councils to develop

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		appropriate mitigation measures and will incorporate results in future decisions.
BOEM-2022-0071-0242-0006	Prohibit commencement of impact pile driving during periods of darkness or poor visibility;	A nighttime pile driving plan will be developed for NMFS and BOEM to review with the intention of demonstrating that Sunrise Wind can meet the visual monitoring criteria for the Level A harassment zone(s)/mitigation and monitoring zones plus an agreed-upon buffer zone (these combined zones are referred to henceforth as the nighttime clearance and shutdown zones) with the technologies Sunrise Wind is proposing to use for monitoring during nighttime impact pile driving. If during nighttime pile driving, undetected animals are found in the clearance and/or shutdown zones, nighttime impact pile driving activities would cease as soon as possible in consideration of human safety, and NMFS, BOEM and BSEE would be notified immediately. See Appendix H for more details on nighttime pile driving monitoring and mitigations.
BOEM-2022-0071-0242-0007	Strengthen noise reduction and attenuation requirements to reflect best available control technology;	Although all sound attenuation systems can have variable effectiveness at different frequencies, there are currently a very limited number of sound attenuation systems that can more effectively target low frequencies. The availability of these systems may limit their use for any particular project. Current requirements under the MMPA and ESA call for the minimum 10 dB reduction of broadband noise levels for all marine mammals, not just mysticetes. BOEM will continue to review this issue and support workshops investigating sound attenuation technologies that would more effectively cover all frequencies of interest for a broad variety of wildlife.

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BOEM-2022-0071-0242-0008	Require improved monitoring of bird and bat presence and collision rates by including radar, visual and thermal camera systems, and Motus and GPS tracking of both listed and non-listed species; commit to deploying collision detection technology, once commercially available;	BOEM will take this comment under advisement if this new technology is proven to be an effective technology for the offshore environment. The Avian and Bat Post Construction Monitoring Plan will be made publicly available for this Project. Additional mitigation and monitoring measures may arise from consultations and coordination with federal and state resource agencies. These additional monitoring requirements would be considered by decision makers and incorporated into the terms and conditions for COP approval.
BOEM-2022-0071-0242-0009	Specify how impacts to bat and bird species will be determined from monitoring data, as well as what will trigger adaptive management;	<p>The Applicant will develop a post-construction monitoring framework in coordination with NYSDEC, NPS, and USFWS. Additionally, the Biological Opinion from USFWS added the following Terms and Conditions:</p> <ol style="list-style-type: none"> <li>1. Prior to the start of WTG operations at SRWF, BOEM must extract from existing Project documentation (e.g., the Biological Assessment, other consultation documents, the final EIS, the COP) a stand-alone summary of technologies and methods that were evaluated by BOEM to reduce or minimize bird collisions at the SRWF WTGs.</li> <li>2. Within 5 years of the start of WTG operation, and then every 5 years for the life of the Project, BOEM must prepare a Collision Minimization Report, reviewing best available scientific and commercial data on technologies and methods that have been implemented, or are being studied, to reduce or minimize bird collisions at WTGs. The review must be global in scope and include both offshore and onshore WTGs.</li> <li>3. BOEM must distribute a draft Collision Minimization Report to the USFWS, Sunrise Wind, and NYSDEC for a 60-day review period. BOEM must address all comments received during the</li> </ol>

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		<p>review period and issue the final report within 60 days of the close of the review period.</p> <p>4. Following issuance of the final Collision Minimization Report, the USFWS may call for a meeting. Within 60 days following a call for such a meeting, BOEM must convene a meeting with USFWS and Sunrise Wind. Meeting participants will discuss the Report and seek consensus on whether implementation of any technologies/methods is warranted.</p>
BOEM-2022-0071-0242-0012	<p>Conduct Atlantic cod spawning surveys in the area of Sunrise Wind to better understand impacts from offshore wind development on spawning cod; and require an anchoring plan and other mitigation measures to reduce impacts to benthic habitats</p>	<p>Atlantic cod spawning surveys are being conducted by NOAA with BOEM funding and are already underway in the Lease Area. Sunrise Wind had also developed an Anchoring Plan. Please see Appendix H for all mitigation and monitoring measures.</p>
BOEM-2022-0071-0242-0015	<p>As noted in previous comments to the agency, offshore wind remains a relatively nascent technology in the United States and, as such, BOEM must closely monitor the impact of offshore wind construction and operations on wildlife and the ocean ecosystem to guide its adaptive management and future development. It is necessary to understand baseline environmental conditions prior to large-scale offshore wind development in the United States, so offshore wind impacts can be clearly understood with relation to pre-development environments. Additionally, as discussed further below, it is imperative that BOEM require robust, long-term monitoring (ideally coordinated regionally) to understand the impacts of offshore wind development on natural resources and that this monitoring data be made available to stakeholders and the public.</p>	<p>Thank you for the comment. BOEM has engaged in, currently engages in, and will continue to engage in monitoring of the potential impacts of offshore wind construction and operations on marine wildlife and the ocean ecosystem to guide its adaptive management and future development. BOEM has engaged in, currently engages in, and will continue to engage in collaboration with stakeholders to share information from monitoring and other research.</p>

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	<p>The Regional Wildlife Science Collaborative for Offshore Wind (RWSC) is a multi-sector collective created and defined by federal agencies, states, conservation organizations, and offshore wind developers to “collaboratively and effectively conduct and coordinate relevant, credible, and efficient regional monitoring and research of wildlife and marine ecosystems that supports the advancement of environmentally responsible and cost-efficient offshore wind power development activities in U.S. Atlantic waters.” We urge that BOEM continue to participate in and fund RWSC to support its science plan development and to implement the monitoring and research activities identified in the science plan.</p> <p>BOEM, through RWSC and individually, should also continue to collaborate with state efforts (e.g., the New York State Energy and Research Development Authority (NYSERDA) Environmental Technical Working Group), scientists, NGOs, the wind industry, and other stakeholders to use information from monitoring and other research, and evolving practices and technology to inform cumulative impact analyses moving forward. As monitoring informs management practices, BOEM must require continued monitoring and employment of adaptive management practices by offshore wind projects. This will ensure that BOEM can swiftly minimize damages of unintended or unanticipated impacts to coastal ecosystems or wildlife and inform strategies for future wind projects to avoid potential impacts.</p>	

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	<p>Responsible development of offshore wind includes applying a framework of avoiding, minimizing, mitigating, and monitoring impacts to wildlife and wildlife habitat. Because even with best efforts to gather and consider all relevant information, considerable uncertainty exists about how offshore wind will affect marine habitats and the wildlife, we therefore urge Sunrise Wind to also support conservation efforts for potentially impacted species and habitats.</p>	
<p>BOEM-2022-0071-0242-0017</p>	<p>Under current regulations, an EIS must “inform decision-makers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment.” These alternatives are defined by the purpose and need of the project, which the agency needs to briefly specify in the DEIS. This requirement has been described in regulation as “the heart of the environmental impact statement.” The courts describe the alternatives requirement equally emphatically, citing it as the “linchpin” of the EIS. The agencies must therefore “[r]igorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated.” Consideration of alternatives is required by (and must conform to the independent terms of) both sections 102(2)(C) and 102(2)(E) of NEPA. In addition, agencies must discuss measures designed to mitigate their action’s impact on the environment.</p> <p>For this Project, the purpose and need is defined as “to determine whether to approve, approve with modifications,</p>	<p>BOEM considered alternative foundations during the development of alternatives, but they were ultimately dismissed for further analysis. Rational for dismissal is presented in Table 2.2-1 of the Final EIS.</p>



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	<p>or disapprove Sunrise Wind’s COP” based on the BOEM’s authority under OCSLA, shared agency goals to deploy 30 GW of offshore wind energy capacity by 2030, while protecting biodiversity and promoting ocean co-use, and the goals of the Applicant. Of the Alternatives presented in the DEIS, we consider Alternative C-2 to best accomplish this goal, although we recommend improvements throughout these comments. We are concerned that the DEIS’s failure to consider alternate turbine foundation technologies, such as gravity based and suction bucket foundations which significantly reduce noise-related impacts to marine mammals and the broader marine ecosystem, appear to be based on the applicant’s conclusion that such technologies were not appropriate for this project in part based on the conclusion that they supply chains were “not mature” and “emerging technolog[ies]” not used at a commercial development. The COP states that the technologies for quiet foundations would not be feasible, but the analysis is not provided to the public for review. BOEM should evaluate and provide for public review a more robust array of foundations, like quiet foundations, that would significantly reduce impacts to the marine environment. Additionally, requiring such technologies could provide the needed impetus to mature supply chains and develop the technology at a commercial scale.</p>	
BOEM-2022-0071-0242-0019	<p>Many marine mammal and sea turtle species are under extreme stress due to climate change, vessel traffic and collisions, entanglement with fishing gear, underwater noise pollution, and other changes in the marine environment. It is</p>	<p>Thank you for your comment, BOEM has reviewed the recommended mitigation measures. Please see Appendix H for mitigation and monitoring measures that may be implemented for this Project.</p>

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	<p>critical to the health of many of these species that we not only transition away from climate warming fossil fuels to renewable resources such as offshore wind, but also that we develop offshore wind resources in a way that does not add additional stress or exacerbate other existing environmental stressors. To comply with the 2005 amendments to the Outer Continental Shelf Lands Act (OCSLA), BOEM must ensure that all activities related to renewable energy development on the OCS are “carried out in a manner that provides for...protection of the environment.” BOEM’s regulations under those amendments require Sunrise Wind to plan and conduct the project in a manner that does not cause “undue harm or damage” to natural resources or wildlife. The project must comply with the federal Endangered Species Act (ESA) and Marine Mammal Protection Act (MMPA), including the MMPA least practicable adverse impact standard for all marine mammal species, before any activities are undertaken. BOEM is also obligated by NEPA to consider the full range of potential impacts on all marine mammal and sea turtle species. We recommend BOEM review the mitigation measures we provide in Attachment 1 and incorporate them into the requirements for the Sunrise Wind project’s development.</p>	
BOEM-2022-0071-0242-0029	<p>Vessel strikes are a leading cause of large whale injury and mortality and have been implicated as one of the major causes of death underlying the ongoing UME for North Atlantic right whales. The dire conservation status of the North Atlantic right whale means that even a single vessel strike poses an unacceptable risk as it will have population-</p>	<p>All vessels 65 ft (20 m) or longer subject to the jurisdiction of the U.S. will comply with the 10-knot speed restriction when entering or departing a port or place subject to U.S. jurisdiction, and in any SMA during NARW migratory and calving periods, from November 1 to April 30. The following is stated in the standard plan: "Between</p>

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	<p>level consequences. Reproductive females and their calves are at elevated risk, exacerbating the impact of vessel strikes on the species' recovery potential. Vessel strikes also pose a significant risk to other large whale species currently experiencing UMEs, such as humpback whales and minke whales, as well as endangered fin whales and sei whales.</p> <p>Eliminating vessels from areas or reducing speeds to no more than 10 knots for all vessels are currently the only known ways to reduce the risk of injury and mortality to marine mammals and sea turtles from vessel strikes. Several of our groups spoke in strong support of the proposed amendments to the Vessel Speed Rule put forth by National Oceanic and Atmospheric Administration (NOAA) Fisheries and believe these measures—with certain improvements, as detailed in our letters—would significantly reduce the risk of mortality and injury of North Atlantic right whales from vessel strike. Any interaction between a vessel and a whale poses a risk of serious injury and mortality, however, risk is higher for vessels traveling at speeds greater than 10 knots.</p> <p>To ensure our national offshore wind industry begins on firm footing, we urge BOEM to require a mandatory 10-knot speed restriction for all project-associated vessels at all times, except in limited circumstances where the best available scientific information demonstrates that whales do not use an area. Project proponents may develop, in consultation with BOEM and NOAA Fisheries, an “Adaptive Plan” that modifies these vessel speed restrictions. However,</p>	<p>November 1st and April 30th: Vessels of all sizes will operate port to port (from ports in NJ, NY, MD, DE, and VA) at 10 knots or less between November 1 and April 30 except for vessels while transiting in Narragansett Bay or Long Island Sound which have not been demonstrated by best available science to provide consistent habitat for North Atlantic right whales. Vessels transiting from other ports outside those described will operate at 10 knots or less when within any active SMA or within the Wind Development Area (WDA), including the SRWF and SWEC. Year Round: Vessels of all sizes will operate at 10 knots or less in any Dynamic Management Areas (DMAs)."</p> <p>Please see Appendix H for additional mitigation measure for the protection of marine mammals and sea turtles.</p>

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	<p>the adaptive monitoring methods that inform the Adaptive Plan must be proven effective using vessels traveling 10 knots or less and following a scientific study design. If the resulting Adaptive Plan is scientifically proven (i.e., via peer-reviewed scientific study) to be equally or more effective than a 10-knot speed restriction, the Adaptive Plan could be used as an alternative to a 10-knot speed restriction.</p> <p>The DEIS states that a complete vessel speed plan for sea turtles and ESA-listed fish will be included in the Protected Species Mitigation and Monitoring Plan (PSMMP). BOEM should provide a timeline for the publication of this document and describe how it will be evaluated and incorporated into the Final EIS, given that it is not currently available for review and public comment.</p>	
BOEM-2022-0071-0242-0032	<p>Based on these above-described findings of right whale habitat use, and the importance of the area for multiple age classes, socializing animals, and most importantly as core foraging habitat, we recommend BOEM extend the time period of the proposed seasonal restriction to December 1 through April 30 to reflect the period of highest detections of vocal activity, sightings, and abundance estimates of North Atlantic right whales. We also underscore that the species should be expected to be found throughout the year in and close to the Project Area, and the most stringent impact avoidance, minimization, and mitigation are required to protect this species at all times during potentially harmful construction activities.</p>	<p>Thank you for your comment. BOEM has been working closely with NMFS to develop a strategy that best protects marine mammals during the proposed construction of the Project and following construction. See Appendix H for mitigation measures and the NMFS Biological Opinion.</p>

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	<p>While BOEM must minimize existing and potential stressors to the North Atlantic right whale, the agency must also address potential impacts to other protected large whale and small cetacean species. It is therefore imperative that BOEM fully account for the consequences of any proposed North Atlantic right whale seasonal restriction on other protected species and evaluate alternative risk reduction strategies sufficiently protective of multiple species. Requiring a robust and scientifically proven near real-time monitoring and mitigation system for North Atlantic right whales and other endangered and protected species for use during impact pile driving and potentially other noise-generating activities would support the development of alternatives.</p>	
<p>BOEM-2022-0071-0242-0034</p>	<p>We are extremely concerned that offshore wind developers are proposing to commence pile driving at night. As the acoustic models for the project demonstrate, impact pile driving generates levels of noise harmful to marine mammals over large distances. The DEIS states that when monitoring at night or in low visibility conditions, protected species observers (PSOs) will monitor for marine mammals and other protected species using night vision goggles with thermal clip-ons, a hand-held spotlight, and/or mounted thermal camera system. However, the efficacy of these technologies is limited to certain distances and particular species or animal groups. For example, reliable detections made via handheld, light-enhancing devices are generally limited to distances of &lt;200 m for cetaceans and &lt;100 m for pinnipeds and sea turtles. Meanwhile, shutdown zones during impact pile driving will be several kilometers in diameter for large</p>	<p>Pile driving at night may be necessary to ensure the Project remains on schedule. Ørsted has recently funded a study looking at the efficacy of night vision devices coupled with other monitoring such as passive acoustic monitoring. Based on this new information, BOEM does not believe that all available technologies have the limitation expressed by the commentor. BOEM and NOAA continue to review the information and develop appropriate mitigation measures should nighttime pile driving occur.</p>

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	<p>whales. Based on the known limitations of currently available night-time monitoring methods and technologies, particularly over distances commensurate with those of the clearance and exclusion zones, it is likely that the detection probability of North Atlantic right whales and other protected species during darkness and periods of poor visibility (i.e., rain, fog, etc.) will be reduced relative to clear visibility conditions. BOEM should also consider that vessels operating at night may be more likely to strike a right whale or other large whale species due to a lack of detectability.</p> <p>It is imperative that no right whale, or other marine mammal species, is present in the applicable Clearance Zone when pile driving starts. BOEM must require that Sunrise Wind initiate pile driving at least 1.5 hours prior to civil sunset in order to maximize monitoring activities during hours of optimal visibility/daylight. Impact pile driving started at least 1.5 hours prior to civil sunset during good visibility conditions can then continue after dark, as necessary, providing passive acoustic monitoring and the best available infrared technologies are used to support visual monitoring of the clearance and exclusion zones during periods of darkness (see Attachment 1). BOEM should also clarify if detection of a sea turtle will delay the start of pile driving or trigger a shutdown and, if so, what the size of pre-start Clearance and Shutdown Zones are for these species.</p>	

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BOEM-2022-0071-0242-0036	<p>As noted, underwater noise pollution has deleterious consequences for most marine life and represents a significant stressor to marine mammals, including North Atlantic right whales. Without sufficient avoidance and minimization measures in place, potentially harmful levels of noise pollution may be generated at each stage of offshore wind development, including pre-construction site assessment and characterization, during construction, and long-term operations. Cumulative noise impacts may also be considerable, particularly in areas where pile driving is taking place simultaneously across adjacent lease areas—a possibility that is increasing in likelihood as projects experience delays and construction windows for different projects overlap—and during operations, where expansive areas of the ocean may experience elevated noise levels that exceed the harassment threshold for right whales and other low frequency hearing cetaceans.</p> <p>Appendix H of the DEIS mentions that the Applicant will employ noise mitigation techniques during all impact pile driving that will attenuate pile driving noise. However, the use of noise attenuation is not anticipated for other noise producing activities. It is important for BOEM to acknowledge that noise generated by these activities (i.e., vibratory pile driving, cofferdam installation, etc.) may disturb marine life, and for the agency to i) monitor noise generated by all construction activities and ii) require noise reduction and attenuation measures if noise levels exceed that which could potentially harm or disturb marine</p>	<p>Thank you for your comment. Other foundation types were considered for alternatives but ultimately eliminated from further analysis (Table 2.2-1). All noise producing activities that can harm marine mammals will have mitigation and monitoring activities associated with them. Please the Section 3.11.5.1.2, <i>Marine Mammals</i>, in the EIS and Appendix H for further details.</p>

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	<p>mammals.</p> <p>We have stressed the most effective way to reduce noise during construction is to install quieter foundation types. If pile driving cannot be avoided, we encourage BOEM to work closely with NOAA Fisheries on activities that could lead to greater levels of noise reduction during impact pile driving for future projects, as noise minimizing approaches during discrete phases of development have been identified by experts as the most promising solution to overcoming noise challenges associated with offshore wind development. Such activities may include the development of a noise reduction standard (akin to the German standard for harbor porpoise) that is tailored to protect species of concern in U.S. waters and designed to account for the larger diameter monopiles planned to be installed, as well as other project- and site-specific conditions in the United States. Given that underwater noise pollution negatively affects species across frequency hearing groups, in the pursuance of this standard we encourage BOEM and NOAA Fisheries to consider a hybrid approach, where risk is reduced for low-, mid-, and high frequencies, rather than solely at the low frequencies at which right whales are most vulnerable. A hybrid approach would help support overall marine ecosystem health rather than prioritize a single species or species group (i.e., low-frequency hearing cetaceans).</p>	



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BOEM-2022-0071-0242-0037	<p>To reduce impacts from noise produced by impact pile driving, BOEM proposes to require a minimum of 10 dB (re: 1 <math>\mu</math>Pa<sup>2</sup>s) reduction of Sound Exposure Level (SEL). This level of noise reduction and attenuation falls below what can now be achieved with best available noise control technology, and we recommend BOEM strengthen its requirements to maximize the level of noise reduction during construction. As described in Bellman et al. (2020) and Bellman et al. (2022), noise reduction levels achieved in Europe through the combined use of two noise abatement systems (NAS; one positioned in the near-field and one in the far-field) have reached a 20 dB (re: 1 <math>\mu</math>Pa<sup>2</sup>s) reduction in SEL, or greater. A combination of the IHC Noise Mitigation Screen (IHC-NMS) and an optimized big bubble curtain (BBC) has proven among the most effective to date, with a minimum, average, and maximum reduction in sound exposure level (<math>\Delta</math>SEL) of 17, 19, and 23 dB, respectively. The deployment of a combination NAS (i.e., two different systems) is considered by those authors to be “state of the art” in terms of SEL reduction and is also important for attenuating sound across a range of frequencies and maximizing transmission loss.</p> <p>We recognize that there are differences between the European offshore wind context and that of the U.S., making the direct transference of findings difficult. The monopiles included in the data set examined by Bellman et al. (2020, 2022) were approximately 8 m or less in diameter, compared with the approximately 10 m or greater diameter monopiles planned for the U.S. Larger diameter monopiles generate</p>	<p>Although all sound attenuation systems can have variable effectiveness at different frequencies, there are currently a very limited number of sound attenuation systems that can more effectively target low frequencies. The availability of these systems may limit their use for any particular project. Current requirements under the MMPA and ESA call for the minimum 10 dB reduction of broadband noise levels for all marine mammals, not just mysticetes. BOEM continues to review this issue and support workshops investigating sound attenuation technologies that would more effectively cover all frequencies of interest for a broad variety of wildlife.</p>

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	<p>greater noise levels at the source. The noise reduction standard the NAS were compared against in Europe was also specifically designed to protect harbor porpoises in German waters (i.e., SEL less than or equal to 160 dB (re: 1 <math>\mu</math>Pa<sup>2</sup>s) at 750 meters from the monopile installation site), and not tailored to the low-frequency cetaceans that are a priority in the U.S. That said, the water depths are, in some cases, comparable across both regions (up to 40 m) and the European findings can be directly applied to the installation of smaller diameter pin-piles in the U.S. The limited evidence that is available from U.S. offshore wind projects also indicate alignment with Bellman et al. (2020, 2022). For example, the limitations of using a single NAS have been demonstrated. Measurements of sound pressure recorded during the installation of an unmitigated and mitigated monopile for the Coastal Virginia Offshore Wind (CVOW) pilot project indicate that a double bubble curtain (i.e., a single NAS) was most effective at higher frequencies (&gt;200 Hz) and did not attenuate sound as effectively at lower frequencies. This indicates that the deployment of a second NAS designed to attenuate noise at lower frequencies would have further reduced noise impacts.</p>	
BOEM-2022-0071-0242-0038	<p>Given these developments, BOEM should require the developer to implement the best commercially available combined NAS technology to achieve the greatest level of noise reduction and attenuation possible, in line with the mitigation hierarchy. Based on the findings of Bellman et al. (2020, 2022), which indicate a reduction of 20 dB SEL is feasible for monopiles 8 meters in diameter, we recommend</p>	<p>Most of the available sound attenuation systems have a greater effectiveness than a 10 dB reduction. However, many variables effect to performance of these systems on any given day. In BOEM's best judgement after review of the best available information, it is reasonable to expect at least a 10 dB reduction of these systems although better performance can be expected. As stated, the performance will be variable</p>

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	<p>that the minimum requirement of a 10 dB (re: 1 <math>\mu\text{Pa}^2\text{s}</math>) reduction of SEL be viewed as a floor only. BOEM should require developers to deploy technologies proven in Europe to be capable of a 15 dB (re: 1 <math>\mu\text{Pa}^2\text{s}</math>) reduction in SEL, or greater. The noise reduction requirement should apply to all aspects of pile driving operations, including pile strikes, compressors, and operations vessels engaged in construction. Field measurements must be conducted on the first pile installed and data must be collected from a random sample of piles throughout the construction period. We do not support field testing using unmitigated piles. Sound source validation reports of field measurements must be evaluated by both BOEM and NOAA Fisheries prior to additional piles being installed and be made publicly available.</p> <p>As offshore wind rapidly advances in the U.S., more stringent noise reduction requirements will form an important means of reducing the cumulative impacts on species and ecosystems that the industry poses. It would also be beneficial at the project-level by reducing the size of necessary monitoring areas and increasing the probability that a protected species is detected prior to the start of pile driving activity (see, also, Section II.C.3).</p> <p>Additionally, a wealth of research exists which details the impacts of continuous noise on marine life, and the importance of reducing this impact. Best available scientific information indicates that, during the operation phase,</p>	<p>and thus a minimum 10 dB reduction. BOEM will continue to review new sound source verification data that will be submitted with every project and may revise the minimum requirements as the data supports the minimum performance metrics of the systems that can be expected.</p>

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	<p>offshore wind turbines may generate noise audible and potentially impactful to large whales and other marine species over significant distances. Understanding levels and impacts of operational noise is an immediate research and monitoring priority as the first offshore wind projects are constructed in the United States. Pending further study, we recommend the use of direct drive turbines as opposed to turbines with a gear box. Direct drive turbines may emit lower noise levels and reduce risk of behavioral disturbance or habitat displacement of North Atlantic right whales and other marine mammal species, and also reduce impacts to key marine mammal prey species, during the operation phase of development.</p>	
<p>BOEM-2022-0071-0242-0041</p>	<p>Unexploded ordnance (UXO) may be encountered on the seabed in the process of developing the Project in the lease area and/or along the export cable routes. UXOs may require removal through explosive detonation, which could cause disturbance and injury to marine mammals and sea turtles. BOEM describes both vessel based and aerial based monitoring during UXO detonations. BOEM intends to employ reticle binoculars for aerial observations and we do not believe these will be effective for visual observations from the plane. Instead, observers should use inclinometers to record the angle of the sighting from the plane and then calculate the distance of the sighting from the plane. In addition to requiring two dedicated visual observers, a data recorder will also be necessary on the plane, especially if Mysticetus software is employed. This is especially important given that fast flight speeds will make it impossible for PSOs</p>	<p>BOEM will take this comment under advisement with NOAA Fisheries for potential inclusion in the MMPA LOA requirements.</p>

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	to adequately observe the water and enter data simultaneously.	
BOEM-2022-0071-0242-0042	Entanglement in abandoned fishing gear contributes significantly to mortality and serious injury of marine mammals and sea turtles, particularly the North Atlantic right whale. In fact, the mortality due to fishing gear entanglement may actually be higher than estimated due to cryptic mortality. We encourage BOEM and the developer to create a marine debris mitigation plan in addition to the requirement that vessel operators, employees, and contractors complete marine debris awareness training as required by the NMFS Biological Assessment.	Abandoned gear is an issue that agencies overseeing commercial fishing activities should address. BOEM does propose to require monitoring of WTG foundations to better characterize the potential role foundations may play in aggregating/snagging fishing gear that is unrelated to the Project. BOEM and BSEE have additional requirements on marine debris and reporting that is directly relevant to industry activities.
BOEM-2022-0071-0242-0047	We further suggest transparent discussion of areas where estimates of minimal risk are based on limited information or high uncertainty. This includes low frequency sound (infrasound) generated during turbine operations, which could potentially interfere with birds' navigation. While there is limited information available to test or contextualize effects of infrasound on birds, more monitoring is needed. Similarly, the indirect effects from redistribution of forage fish populations following construction are also not discussed. Installation of turbines at Sunrise Wind will likely affect forage fish populations by removing existing hard and soft bottom substrates, and replacing them with vertical structures that act as artificial reefs. Given high uncertainty surrounding effects of these alterations on fish and secondary consequences for avian habitat use and energetics, the potential for such effects (whether positive, negative, or neutral) should be acknowledged and	Thank you for your comment. A Post-construction Avian and Bat Monitoring Framework was developed by Sunrise Wind, and if results indicate bird and bat impacts deviate substantially from the impact analysis included in this EIS, then Sunrise Wind must make recommendations for new mitigation measures or monitoring methods. Additionally, fisheries monitoring was designed in accordance with recommendations set forth in "Guidelines for Providing Information on Fisheries for Application for Renewable Energy Development on the Atlantic Outer Continental Shelf" and consideration to the Responsible Offshore Science Alliance (ROSA) Offshore Wind Project Monitoring Framework and Guidelines. For more information on mitigation and monitoring proposed for this Project please see Appendix H.

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	incorporated into adaptive monitoring frameworks.	
BOEM-2022-0071-0242-0050	<p>The Sunrise Wind COP monitoring framework contains notable gaps that will limit its ability to fully detect avian impacts at this project, namely:</p> <ul style="list-style-type: none"> <li>• It does not fully measure nocturnal traffic. Acoustic sensors can identify species passing through the turbine area but cannot reliably count large flocks, identify migrating birds that do not call in-flight, or separate species with similar calls. Integrating acoustic data with camera technologies and/or radar systems is required to fully measure migrant traffic and identify all species, as well as providing valuable supplementary data on number of individuals, flight speed, and flight height.</li> <li>• It does not address micro-scale collision or avoidance. Although collision monitoring is key to assessing direct effects of wind turbines, collision detection of birds with turbines is limited to opportunistic carcass surveys on platforms and vessels. Such surveys would fail to record any (and very likely most) bird strikes in which carcasses do not land on a fixed or floating structure. Provision for an automated, multi-sensory monitoring system will better enhance understanding of avian and bat activity by tracking micro-avoidance or -attraction behaviors, gauging species composition at the Project site (both diurnally and nocturnally), and detecting movement flux rates for individual aerial wildlife through at least some portion of the project</li> </ul>	Thank you for your comment. BOEM and Sunrise Wind will continue to work on the Post-construction Avian and Bat Monitoring Framework if the Project is approved for development.

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	<p>site.</p> <ul style="list-style-type: none"> <li>It limits individual tracking to ESA-listed species. There are many important reasons to track non-listed avian species. In cases where welfare concerns or rarity preclude tracking of listed species, non-listed substitutes may be required (e.g., Common Terns for Roseate Terns). Some marine bird species that are globally threatened or endangered under the International Union for Conservation of Nature Red List are not listed under the ESA because of listing delays or because they breed elsewhere. Regardless of listing status, species with high vulnerability to offshore wind or with uncertain population trends should be included in Motus studies to better measure migratory connectivity and determine appropriate locations for population monitoring.</li> <li>It does not identify acceptable levels of mortality, or displacement, or describe potential mitigation activities that could offset such impacts. The monitoring framework for offshore birds does not directly address the mitigation actions that would be taken for any observed collision or displacement effects, what level of observed impact would trigger such measures, or the kind of habitat and/or resource equivalency analysis that would be implemented for computing the offsets used for restoration.</li> </ul>	

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BOEM-2022-0071-0242-0051	<p>We recommend the following changes to Sunrise Wind’s monitoring framework for birds:</p> <ol style="list-style-type: none"> <li>1. Add visual camera and thermal/infrared camera systems at substations and selected turbines. This will improve detection and identification of nocturnal migrants and help estimate collision rates and avoidance behaviors. Incorporating multiple sensor types, or using available integrated monitoring systems that combine acoustic detection with visual camera technologies, thermographic imaging, and VHF detection,164 would be a much more appropriate system to collect the information sought.</li> <li>2. Prioritize GPS tracking rather than Motus tracking wherever possible. Currently, satellite uploading GPS transmitters weighing 4 g are commercially available, meaning that any individual bird or bat weighing <math>\geq 133</math> g could be tracked using GPS without exceeding the accepted 3% body mass threshold for ideal transmitter weight. This number will likely decrease over time, as transmitters weighing 1 g (suitable for a 33 g animal) are currently in development.</li> <li>3. Consider adding focal, non-ESA listed bird species for a cross-project tracking study to detect whether and how avoidance, attraction, collision risk, and/or displacement may occur around the Project Area and adjacent lease areas. Selection of such a species can rely on the results of either project site surveys in aggregate or the MDAT data,</li> </ol>	<p>Thank you for your comment, BOEM will take these recommendations under consideration.</p>



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	<p>preferably both, that identify those species that are most widespread across all three wind farms (Sunrise, South Fork, and Revolution Wind Farms). A cross-project tracking study could also build on previous studies that have identified the most susceptible species of marine birds.</p> <p>4. Minimize acoustic disturbance from construction and operations on diving marine birds. One means to accomplish this objective is to co-place seabird observers with marine mammal PSOs during pertinent acoustic disturbance activities and monitoring periods. However, underwater acoustic disturbance to diving marine birds would be obviated if all pile-driving and other noisy activities are scheduled largely outside the winter and early spring months (November-April) when few or no such diving species would be present in the wind farm area.</p>	
BOEM-2022-0071-0242-0052	<p>5. Expand monitoring of avian displacement to include detecting avoidance at individual wind turbines across relevant spatial scales. Meso- and macro-scale displacement can be studied with high-definition digital aerial surveys using established protocols and accepted survey designs. We recommend that project study areas should include a minimum buffer of at least 20 km around the lease and construction areas and that aerial transects should be spaced 3 km apart, cover the entire study area, with at least 10% spatial coverage of the combined lease and buffer areas. To the extent possible, surveys should be repeated three times within each sampling window, with windows scattered throughout the year, including during each of four seasons.</p>	<p>Thank you for your comment. Sunrise Wind has developed a Post-construction Avian and Bat Monitoring Framework and would engage with federal and state agencies and eNGOs to identify appropriate monitoring options and technologies, and to facilitate acceptance of the final plan. Please see Appendix H for proposed mitigation and monitoring measures for Birds.</p>

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	<p>Survey protocols should be repeated for consecutive years before and after construction, covering a minimum of two years pre-construction, and two years postconstruction. Survey intervals should be spaced sufficiently to be approximately statistically independent (e.g., 3-5 days apart). Data analysis should account for differences in detection probability based on species, flight height, and environmental factors and models. Micro-scale displacement should be studied with automated, remote instrumentation that quantifies continuous bird flux at risk height, but also, where feasible, detect and record the approach distances, directional changes, and collision impacts of individual birds.</p> <p>6. Include a reasonable requirement for timely data reporting (e.g., all data collected during monitoring efforts must be made available within a year after collection). This practice will ensure that monitoring data are in the public domain to be accessed by researchers working on affected species throughout their ranges, thereby enabling rapid integration of findings across multiple offshore wind energy projects to gauge cumulative effects more fully.</p> <p>7. Describe acceptable levels of impact and specify mitigation to be taken. This activity should include describing: (a) how carcass observations or other collision and displacement monitoring results can be extrapolated to achieve realistic estimates of the mortality within a population-level context, (b) what thresholds (demographic, mortality, etc.) will be used to initiate mitigation activities, (c) what mitigation activities for restoration will be considered to offset the</p>	

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	<p>observed impacts, including why those restoration actions are appropriate for the particular taxa involved, and (d) what measures of success are to be used to confirm restoration management strategies have been successful.</p>	
<p>BOEM-2022-0071-0242-0053</p>	<p>For at least some of the bird species potentially vulnerable to impacts from offshore wind development, conservation measures are feasible to reduce other stressors and therefore the overall risk to the population. Support from the offshore wind industry for such conservation measures could help mitigate impacts from the development of offshore wind. Mitigation activities, such as restoration, that are taken should prioritize species of greatest need. Priorities may include ESA-listed species like Roseate Tern, or species predicted to have the highest likelihood of cumulative impacts due to the extensive footprint of offshore wind development expected in the future along the U.S. East Coast, e.g., sea ducks, loons, grebes, and cormorants. Similarly, avian species with high population, collision, or displacement vulnerability scores would make prime candidates for greater attention in Sunrise Wind’s monitoring and/or compensatory mitigation activities.</p> <p>Other programs that may provide example frameworks for an offshore wind wildlife mitigation program may include in-lieu fee wetlands mitigation programs under the federal Clean Water Act, the Natural Resource Damage Assessment and Restoration Program, the Renewable Wind Energy Research Fund, state endangered species mitigation programs such as the Massachusetts Endangered Species Act</p>	<p>Thank you for your comment. Impacts to birds are discussed in Section 3.8., <i>Birds</i>, can be found in Appendix H, <i>Mitigation and Monitoring</i>, and Sunrise Wind has developed a Post-construction Avian and Bat Monitoring Framework (Appendix P2 of the COP). Additionally, USFWS developed mitigation recommendations based on the Biological Assessment developed for this Project, these mitigations can be found in Table H-2 of Appendix H.</p>

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	(MESA) Conservation and Management Plan permitting process, or the Vermont Act 250 Section 248 Certificate of Public Good process.	
BOEM-2022-0071-0242-0061	Because, as discussed above, pre-construction acoustic activity may not accurately predict postconstruction fatalities for bats, a commitment to post-construction monitoring is critical to yielding a better understanding about how bats interact with offshore wind turbines.	The Avian and Bat Post-Construction Monitoring Framework is included as an attachment to COP Appendix P2 and is publicly available on BOEM's website.
BOEM-2022-0071-0242-0062	Sunrise Wind’s proposal for two years of post-construction acoustic monitoring is an excellent first step. We recommend that Sunrise Wind install bat detector stations at nacelle height (rather than on convertor stations, turbine platforms, and/or buoys) so as to detect activity when bats are in the rotor swept zone and more likely at risk for collision. Additionally, BOEM should require that all acoustic data be reported and submitted to NABat and/or the Bat Acoustic Monitoring Portal, Bat AMP.	The Avian and Bat Post-Construction Monitoring Framework, which is included as an attachment to COP Appendix P2 and is publicly available on BOEM's website. Additional mitigation and monitoring measures may arise from consultations and coordination with federal and state resource agencies. These additional monitoring requirements would be considered by decision makers and incorporated into the terms and conditions for COP approval.
BOEM-2022-0071-0242-0063	<p>We are excited to see Sunrise Wind proposing to install and potentially upgrade Motus towers and support radio-tagging of ESA-listed birds. We recommend that Sunrise Wind also support the tagging of bats, which are underrepresented in Motus, to support understanding of bat activity offshore. Additionally, we suggest that BOEM require deployment of Motus towers pre-construction in coordination with the U.S. Fish and Wildlife Service’s offshore Motus network, as BOEM is requiring new lessees in both the New York Bight, Carolina Long Bay, and California.</p> <p>We also urge Sunrise Wind to keep Motus towers deployed,</p>	Additional mitigation and monitoring measures may arise from consultations and coordination with federal and state resource agencies. These additional monitoring requirements would be considered by decision makers and incorporated into the terms and conditions for COP approval.

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	<p>active, and maintained for as much of the lifetime of the Project as possible. Data from these towers will not only inform Sunrise Wind’s adaptive management but also, as multiple offshore wind projects are developed, provide a long-term network of Motus towers in the offshore environment that can shed much needed light on species’ movements offshore. This would also support Sunrise Wind’s commendable intention to coordinate their monitoring with efforts with other offshore wind projects in the area.</p>	
<p>BOEM-2022-0071-0242-0064</p>	<p>Sunrise Wind plans to report dead or injured bats found on vessels and project structures. We note that assessing bat fatalities based on carcasses found on vessels and structures is unlikely to provide a meaningful estimate of bat fatalities, as carcasses can fall far from the wind turbine, based on carcass size, wind speed, turbine height, and other factors. BOEM should consult with experts to determine what, if any, inferences about total fatalities can be made from carcasses detected on vessels and project structures.</p> <p>As new technologies become available for monitoring fatalities at offshore wind facilities, such as strike detection technology, BOEM should require Sunrise Wind to commit to deploying these and, if monitoring reveals that impacts to bats are non-negligible, BOEM should require Sunrise Wind to employ minimization strategies and deterrent technologies.</p>	<p>Additional mitigation and monitoring measures may arise from consultations and coordination with federal and state resource agencies. These additional monitoring requirements would be considered by decision makers and incorporated into the terms and conditions for COP approval. Appendix H has been revised to reflect this comment. BOEM will take this comment under advisement if this new technology is proven to be an effective technology for the offshore environment.</p>
<p>BOEM-2022-0071-0242-0065</p>	<p>We strongly support BOEM’s proposed measure that Sunrise Wind recommend new mitigation measures or monitoring measures “[i]f the reported post-construction monitoring</p>	<p>BOEM will take this comment under advisement if this new technology is proven to be an effective technology for the offshore environment. The Avian and Bat Post-Construction</p>

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	<p>results bird and bat monitoring results indicate bird and bat impacts deviate substantially from the impact analysis included in this EIS[.]” However, there is a lack of clarity as to what would trigger this adaptive management. The post-construction monitoring for bats that Sunrise Wind has proposed—two years of acoustic monitoring—will provide information on bat activity in the Project Area. It will not, however, provide information on bat collisions, which are potentially the greatest source of impact to bats from offshore wind development. No research or methods are presented to translate bat activity into bat impacts nor are we aware of any methods accepted by subject matter experts to do so.</p> <p>Because the proposed monitoring methods are unlikely to provide estimates of bat collisions from Sunrise Wind’s offshore operations but no collision detection technologies are validated and commercially available for use offshore, BOEM should require Sunrise Wind to commit to deploying collision detection technology, once available. Strike detection technology is in development, with one technology to be tested on an offshore wind turbine in 2023. Sunrise Wind should work with agency staff and researchers to determine the appropriate duration of post-construction fatality monitoring using their current proposed methods and for after collision detection systems are installed.</p> <p>The above recommendations should be included in the to-be-developed Avian and Bat Post Construction Monitoring</p>	<p>Monitoring Framework is included as an attachment to the COP as Appendix P2 and is publicly available on BOEM's website.</p>

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	Plan, and this plan should be made publicly available.	
BOEM-2022-0071-0242-0077	<p>The Draft EIS proposes several mitigation and monitoring measures for benthic resources, invertebrates, finfish, and EFH. These include: (1) an anchoring plan; (2) to the extent practicable, siting the Project and SRWEC to avoid and minimize impacts to sensitive habitats, and avoiding such areas during construction; (3) pre-construction, construction, and post-construction monitoring of benthic habitats in the project area; (4) noise attenuation systems during impact pile driving, including the use of a bubble curtain. We generally support these measures and propose several additional measures to reduce impacts to benthic habitats, finfish, and EFH.</p> <p>Under the proposed anchoring plan, Sunrise Wind would develop an anchoring plan to avoid and minimize adverse impacts to complex habitats during project construction and operations. The anchoring plan would delineate areas of complex habitat around each turbine and cable locations, and identify areas restricted from anchoring. BOEM should require Sunrise Wind to conduct such a plan.</p> <p>Sunrise Wind proposes to avoid siting the Project and SRWEC in sensitive habitats to the extent practicable. While Alternative C would reduce impacts to complex benthic habitats, this alternative would still result in construction occurring in complex habitats in some areas. To further reduce impacts, BOEM should require, to the extent practicable, Sunrise Wind to employ micrositing of WTGs and</p>	<p>Sunrise Wind will conduct pre-construction and post-construction monitoring of benthic habitats in the Project Area (Mitigation measure BENTH - 05). To the extent practicable, the SRWF and SRWEC will be sited to avoid and minimize impacts to sensitive habitat (BENTH-06). Sunrise Wind is committed to collaborative science with the commercial and recreational fishing industries prior to, during, and following construction. Fisheries and benthic monitoring studies (Appendices AA1 [Sunrise Wind 2022a] and AA2 [Sunrise Wind 2022b] of the COP) are being planned to assess impacts associated with the Project on economically and ecologically important fisheries resources within the SRWF, along the SRWEC, and in the ICW. These studies will be conducted in collaboration with the local fishing industry and will build upon monitoring efforts being conducted by affiliates of Sunrise Wind at other wind farms in the region (FISH-04).</p>

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	<p>cables to avoid siting in complex benthic habitats and other sensitive habitat areas, including areas where subaquatic vegetation is present.</p> <p>More generally, BOEM also states that Sunrise Wind is committed to pre-construction, construction and installation, and post-construction monitoring of benthic habitats in the Project Area. The Draft EIS provides few details on these monitoring studies and does not explain whether Sunrise also plans to conduct monitoring studies of EFH, invertebrates, and finfish. BOEM should clarify in the Final EIS that Sunrise Wind must conduct monitoring studies for all these resources. Moreover, at a minimum, BOEM should require Sunrise Wind to conduct the necessary pre-construction, construction, and postconstruction monitoring of benthic habitats and associated flora and fauna to detect any physical changes and impacts to these habitats and species that occur because of construction activities, the presence of WTG structures in the water columns, hydrodynamic effects, and other impacts.</p>	
BOEM-2022-0071-0248-0020	<p>Fisheries Mitigation refers to siting and project design principles specifically adopted to reduce impacts to fishing. It is not satisfied through compliance with standard mandatory health and safety regulations, although these are important. BOEM has effectively pitted one industry against the other. On the one hand you have a historic, sustainably operated industry integral to our nation’s food supply with environmental impacts that are well known and well understood and rates favorably in terms of the carbon</p>	<p>Thank you for your comment. Fisheries mitigation will be addressed through various routes including ongoing research, compensation, and protection measures for sensitive species in this Lease Area, like Atlantic cod. BOEM has worked closely with NMFS on the EFH Assessment and this EIS to identify sensitive species and habitats.</p>



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	<p>footprint to produce a pound of protein. On the other you have a new industry with great promise; but unknown impacts. The fishing industry acknowledges the need to reduce our reliance on activities which will negatively impact our climate. But we cannot, nor should we, prioritize one industry over another. As we, and others, have consistently communicated, siting of OSW projects should be a collaborative effort with the primary goal of avoiding impacts. Unfortunately, that has not been an approach utilized and we are being forced to choose between feeding the nation and renewable energy. Early efforts focused on avoiding impacts could have better framed mitigation conversations. Unfortunately, mitigation to the commercial fishing industry is focusing on compensation. Mitigation is not synonymous with compensation.</p>	
<p>BOEM-2022-0071-0248-0021</p>	<p>BOEM’s draft analyses recognize the potentially major impacts to fishing, marine mammals, and navigation of the proposed projects and their respective alternatives. Yet, not all mitigation proposals offered by the fishing industry were evaluated as alternatives in the DEISs. These are summarized below; a full discussion is included in prior RODA’s scoping comments on these and other projects.</p> <p>Additional modifications in the project areas to preserve fishing access;</p> <ul style="list-style-type: none"> <li>• Immediate strategies to address impacts to protected resources during the length of the lease so they are ready to be implemented immediately once impacts are detected;</li> </ul>	<p>Mitigations for marine mammals are not proposed as alternatives since any proposed mitigation would apply to all alternatives.</p>

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	<ul style="list-style-type: none"> <li>• Direct and transparent collaboration with the fishing industry on shoreside considerations including port infrastructure, dock usage, and economic impacts or opportunities;</li> <li>• Safe transit areas through the lease areas under consideration and those reasonably foreseeable, analyzed and implemented using a cumulative effects approach;</li> <li>• Adequate, independent processes for gear loss claims;</li> <li>• Adhere to a holistic approach to determining and awarding compensation from economic loss to fishing and fishing businesses;</li> <li>• Improved federal environmental review analysis and clear identification of scientific unknowns;</li> <li>• Require deicing technology and practices;</li> <li>• Perform “micrositing” of turbines and cables with fishermen who know the areas and surrounding ecosystem(s);</li> <li>• Prohibit turbines, foundations, and cables in sensitive habitat including spawning areas and important fishing grounds;</li> <li>• Monitor fisheries impacts for the life of projects and utilize adaptive management;</li> <li>• Resolve impacts to National Marine Fisheries Service (NMFS) fishery-independent surveys;</li> <li>• Ensure that any economic benefits of offshore wind</li> </ul>	

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	accrue to the U.S.—not at some undetermined point in the future, but now.	
BOEM-2022-0071-0248-0032	Compensation for Gear Loss and Damage: Compensation for gear loss or damage as a result of interactions with the Project should be assured. Language should be added which allows fishery participants to be compensated for all gear loss and damage resulting from interactions with infrastructure supporting an OSW facility. Exceptions would exist for interactions which are intentional or the result of gross negligence on the part of the vessel operator. There are a number of things outside of the operator’s control which could result in interactions with infrastructure and facilities supporting OSW.	APM "CFHFISH-06" indicates that Sunrise Wind would implement Ørsted's corporate policy and procedure to compensate commercial/recreational fishing entities for gear loss as a result of Project activities. This is also outlined in BOEM's draft guidance for Mitigating Impacts to Commercial and Recreational Fisheries on the Outer Continental Shelf.
BOEM-2022-0071-0248-0033	Compensation for Lost Fishing Income: BOEM’s draft guidance for Mitigating Impacts to Commercial and Recreational Fisheries on the Outer Continental Shelf was woefully inadequate in its approach to fisheries compensation. RODA submitted detailed comments outlining those inadequacies and we incorporate those comments by reference.	The Final EIS (Appendix H) outlines different mitigation measures related to compensation for lost fishing income and gear loss, etc., referencing BOEM's draft guidance.
BOEM-2022-0071-0248-0034	Mobile Gear–Friendly Cable Protection Measures: In developing such protection measures, developers must engage with fishery participants in an effort to understand their needs. In particular, bottom tending gear such as surfclam and scallop dredges, bottom-trawl and others should be consulted to mitigate impacts to fleets utilizing that gear type. This may result in preferred orientation of subsea cables and cable protection or other recommendations from operators in the region should they	Thank you for your comment. A mobile gear friendly cable protection measure is included in Appendix H. Additionally, there is a proposed Boulder Relocation Plan measure which includes outreach conducted with mariners. Please see Appendix H for additional details on these mitigation measures.

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	choose to continue fishing in a project area.	
BOEM-2022-0071-0249-0010	<p>According to the Cumulative Historic Resources Visual Effects Analysis, up to 3,618 wind turbines will eventually be present in the visual geographic analysis area and will change the ocean’s undeveloped character to an “industrial wind farm environment” with “major adverse impacts on scenic and visual resources.” It is concerning, then, to see the lack of minimum guidelines and best practice standards established for offshore wind projects in the United States, especially as they relate to adverse visual impacts upon National Historic Landmarks and historic properties, sites, and districts listed or eligible for listing in the National Register of Historic Places. It is essential to apply consistent criteria to this project and subsequent future sites. Due to the high cultural and historic sensitivity of our clients’ ocean-facing historic properties, best practice criteria must be applied. Minimum standards should include:</p> <ul style="list-style-type: none"> <li>• Requiring the least impactful nighttime lighting, such as ADLS, as a permit condition;</li> <li>• Requiring all windfarms in a specific region to use the same non-reflective paint color, determined to be most effective in minimizing the visual impacts, per specific atmospheric/geographical conditions of the lease sites;</li> <li>• Establishing minimum set-back standards from land, with specific considerations for historic landmarks and areas with tourism-driven economies;</li> <li>• For communities with historical significance, BOEM</li> </ul>	<p>BOEM continues to consult with consulting parties and cooperating agencies regarding adverse effects to Historic Properties and the resolution of those effects through the development of comprehensive stipulations subject to review and signature by required signatories as part of the MOA included in Appendix J. Please see Appendix E of the Final EIS for the newest estimate of WTG’s proposed for offshore wind construction.</p>

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	<p>should help ensure that local stakeholders receive fair and direct access to any state and federal agencies or resources, which may provide critical regulatory guidance on how best to avoid, minimize, and mitigate the local impacts of offshore windfarms. This support would be provided independent of the Section 106 process, and would, for example, identify and encourage dialogue between communities with their State Historic Preservation Officer (SHPO) and the Advisory Council on Historic Preservation (ACHP); and</p> <ul style="list-style-type: none"> <li>• Requiring—to the extent to which harm to historic and cultural resources cannot be avoided or minimized—appropriate project mitigation measures to offset the impacts to communities, such as community benefit agreements, offshore wind mitigation trust funds, or other economic development arrangements, as are standard in the offshore wind industry globally. At this critical juncture in the development of the U.S. offshore wind industry, stakeholders are open minded, if not supportive, of a successful industry that shares benefits with local communities who will bear the brunt of adverse impacts and certain risk of loss to their economies.</li> </ul>	
BOEM-2022-0071-0158-0008	Identify which mitigation measures are assumed for the purpose of impacts determinations	All APMs are considered part of the Proposed Action and alternatives, excluding the No Action Alternative. Other mitigation measures developed during the EIS through comments and consultations are listed in Appendix H and at

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BOEM-2022-0071-0158-0035	<p>Mitigation measures are necessary to reduce the potential negative environmental and socioeconomic impacts of the Sunrise Wind project. The recommendations outlined in our offshore wind energy policies, referenced above, should be reflected as terms and conditions for approval of the project. We provided a separate comment letter on the draft Guidelines for Mitigating Impacts to Commercial and Recreational Fisheries. These comments supported many of the mitigation measures recommended in that draft guidance. We recommend that all final mitigation guidelines be reflected in terms and conditions for BOEM’s approval of this project. This is especially important given the DEIS only states that “the lessee shall implement a gear loss and damage compensation program consistent with BOEM’s draft guidance...” (page H-67). Furthermore, there is reference in Appendix H that Ørsted’s corporate policy and procedure will be implemented to compensate for any commercial/recreational fishing entities gear loss, however, this policy is not hyperlinked or provided.</p>	<p>the end of each resource section in Chapter 3.</p> <p>BOEM has reviewed the Council's wind policy referenced and concurs with the content of the document. BOEM also finds that the document is consistent with the approach of the EIS with respect to stakeholder engagement, BMPs, and environmental review considerations (e.g., navigation and safety, evaluation of impacts on fisheries). Therefore, no changes to the EIS are needed.</p>
BOEM-2022-0071-0158-0036	<p>Appendix H includes the analyzed potential mitigation and monitoring measures; however, it is unclear which of these measures are likely to be required by BOEM as opposed to optional. Assumptions about which mitigation measures are required will affect the impact determinations and overall conclusions in the FEIS. For example, time of year restrictions on construction can be used to protect sensitive spawning and fishing periods. This is being proposed for the summer flounder HAPC (page H-10), which the MAFMC designated as</p>	<p>Thank you for your comment. APMs (Table H-1 in Appendix H) are included in the analysis and impact determination for the Proposed Action and alternatives, with the exception of the No Action Alternative. Other mitigation measures proposed by agencies or BOEM are included in Table H-2 to Table H-3 and would include additional mitigations that can further reduce the impacts on resources. These additional measures will be identified for implementation in the Record of Decision. Mitigation and monitoring measures required through permits</p>

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	<p>all native species of macroalgae, seagrasses, and freshwater and tidal macrophytes in any size bed, as well as loose aggregations. In addition, “time-of-year in-water restrictions to the extent feasible to avoid or minimize impacts to Atlantic sturgeon” are included as mitigation measures (page H-10), though it is not clear what type of monitoring and minimization plans will be put in place. The Councils are supportive of time of year restrictions to reduce potential impacts to sensitive life stages of fishery species, to reduce impacts to fisheries, and to avoid impacts to submerged aquatic vegetation and other structured habitats throughout the project area and cable route. However, further detail should be provided in the FEIS on how this would be done and what exactly these measures would achieve. We recommend working with NOAA Fisheries on impact determinations and identification of sensitive habitats and fishing periods to avoid as ways to mitigate impact.</p>	<p>(Section H.4 in Appendix H) will be required if permits are approved and the Project is approved for development.</p>
<p>BOEM-2022-0071-0158-0038</p>	<p>The Councils are also concerned with the scour protection measures included within the DEIS (e.g., rock placement, mattress protection, sandbags, and stone bags). Per the Council’s offshore wind energy policy, we recommend that if scour protection or cable armoring is needed, the materials should be selected based on value to commercial and recreational fish species. Natural materials, or materials that mimic natural habitats, should be used whenever possible. These materials should not be obtained from existing marine habitats and must not be toxic.</p>	<p>Thank you for your comment, a mitigation measure has been included in Appendix H which states, "To minimize the impacts of habitat conversion from scour protection, natural or engineered rounded stone of consistent grain size, that mimics natural seafloor substrates, should be used. At a minimum, any exposed surface layer should be designed and selected to provide three-dimensional structural complexity that creates a diversity of crevice sizes (e.g., mixed stone sizes) and rounded edges (e.g., tumbled stone), and be sloped such that outer edges match the natural grade of the seafloor. Should the use of concrete mattresses be necessary, bioactive concrete (i.e., with bio-enhancing admixtures) should be used as the primary</p>

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		scour protection (e.g., concrete mattresses) or veneer to support biotic growth."
BOEM-2022-0071-0158-0039	The DEIS states that the developer will include ways "to mitigate operational impacts on oceanographic high-frequency radars" (page H-51). The fishing industry has proven to be adaptable in the face of change; however, more deliberate mitigation measures that support vessel radar upgrades could minimize impacts to fishermen and others navigating through and around the project area. An adaptation fund is included within the mitigation measures identified in the Empire Wind DEIS. We recommend a similar fund for Sunrise Wind to support vessel radar upgrades and training to help minimize impacts to fisheries and others navigating through and around the project area.	<p>In the revised COP (September 27, 2023), Sunrise Wind added an EPM that confirms that "Sunrise Wind will establish a ... Navigation Safety Fund". See Table ES-1, Section 4.7.4.3, and Table 4.9-1.</p> <p>Sunrise Wind provided additional information regarding this fund to BOEM in response to Requests for Interest (RFIs) on July 12, 2023, and May 12, 2023. That information is copied below for reference. Final measures have been incorporated within NYSDOS (received August 24, 2023), Rhode Island Coastal Resources Management Council (received September 7, 2023), and Massachusetts Office of Coastal Zone Management's (received October 6, 2023) Coastal Consistency Determinations.</p> <p>The Rhode Island Coastal Resources Management Council and Massachusetts Office of Coastal Zone Management determinations each include a Navigational Enhancement and Training Program Term Sheet, which outline the Program objectives, approach and eligibility, funding/cap, administration, and redemption process. The New York Determination references a Letter of Intent (LOI) executed by Sunrise Wind and NYSDOS to enter into a Memorandum of Understanding concerning certain proposed mitigation measures. The LOI includes an agreement by Sunrise Wind to contribute to an established Navigational Safety Fund to enable commercial fishermen and for-hire vessels to acquire navigation equipment through a grant or voucher system and provide training and experiential learning opportunities to</p>



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		<p>those navigating within the Ørsted/Eversource joint Venture Wind Lease Areas in the Rhode Island/Massachusetts Wind Energy Area. Sunrise Wind and NYSDOS will work collaboratively to determine the best mechanism for Sunrise Wind to contribute to a Navigation Enhancement and Training Program.</p> <p>July 12, 2023, Response to RFI: A Navigational Safety Fund will be established within 30 days of receipt of all final federal, state, and local permits, authorizations, concurrences, and approvals necessary to construction and operate the Sunrise Wind Project and will exist until funds run out. The Navigational Safety Fund will enable eligible commercial fishermen and for-hire vessels to acquire navigation equipment through a voucher system and will also provide training and experimental learning opportunities to those navigating within Ørsted/Eversource’s Lease Areas off the coast of Rhode Island and Massachusetts. The Navigational Safety Fund was described in a RFI response provided on May 12, 2023 and will be similar to and carry out the same intent as the program established for South Fork Wind (see Sunrise Wind’s Rhode Island Federal Consistency Decision, pg. 727) and Revolution Wind (see Revolution Wind’s Rhode Island Federal Consistency Decision, pg. 200).</p> <p>May 12, 2023, Response to RFI: The Navigational Safety Fund will be in place 30 days after the receipt of all final federal, state and local permits, authorizations, concurrences, and approvals necessary to</p>

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		<p>construct and operate Sunrise Wind as described in the approved COP and will exist until funds run out. The Navigational Safety Fund will enable eligible commercial fishermen and for-hire vessels to acquire navigation equipment through a voucher system. The Navigational Safety Fund will be similar to and carry out the same intent as the program established for South Fork Wind. It will also provide training and experiential learning opportunities to those navigating within Ørsted/Eversource’s lease areas off the coast of Rhode Island and Massachusetts. Fishermen eligible for the Rhode Island and Massachusetts Direct Compensation Programs and who do not already possess AIS transceivers and/or pulse compression radar systems may receive one-time grants for up to \$10,000 in order to upgrade or purchase pulse compression radar or AIS. Commercial fishing vessels and inspected for-hire/party vessels will be eligible for \$10,000 in upgrades and uninspected for-hire vessels will be eligible for \$5,000 in upgrades. Eligible fishermen will be issued vouchers to spend at approved vendors for approved products. The process of issuing vouchers, approving vendors, and approving equipment will be managed by a third party which could be the same third-party managing the Direct Compensation Program. In addition to vessel upgrades, there will be an educational component to the Navigational Safety Fund. Those eligible for direct compensation, may attend a professional training of their choice with support up to \$1,000 per person. Eligible trainings include but are not limited to a captain’s course, license upgrade, radar course, or rules of the road refresher. Like vessel upgrades, a third-party manager will</p>

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		<p>issue vouchers for training and be responsible for approving trainings, trainers, educators, and/or institutions.  <a href="http://www.crmc.ri.gov/windenergy/dwsouthfork/SFWF_FedConsistencyDecision_20210701.pdf">www.crmc.ri.gov/windenergy/dwsouthfork/SFWF_FedConsistencyDecision_20210701.pdf</a></p>
BOEM-2022-0071-0158-0040	<p>Unexploded ordnances (UXOs) can be uncovered during site preparation activities. Exposed UXO presents a significant risk to mariners, especially those towing mobile gear that could bring UXO to the surface. Offshore wind project construction activities can uncover UXOs. We recommend that the terms and conditions specify that developers are responsible for the safe disposal of UXO exposed due to construction activities. Our understanding is that some UXOs might be detected via surveys but are not exposed; in such cases, only mariner notification may be sufficient given disposal may present greater risks. Clear, timely, and repeated communication about UXO locations and any changes in the location or status of UXOs is essential and should not rely only on email notifications</p>	<p>Sunrise Wind has addressed UXO/MEC disposal in Appendix H. BOEM cannot require disposal of unexploded ordnances. In the event a confirmed UXO/MEC is discovered, the Lessee coordinates with the USCG to ensure it is published in the next version of the Local Notice to Mariners.</p>

**O.6.23. Purpose and Need**

**Table O-31. Responses to Comments on Purpose and Need**

Comment No.	Comment	Response
BOEM-2022-0071-0065-0001	Citizens Campaign for the Environment (CCE) is a 120,000 member, non-profit, non-partisan organization that empowers communities and advocates solutions to protect public health and our environment. CCE strongly supports advancing well-sited, environmentally responsible renewable energy projects and phasing out the use of antiquated fossil fuels on Long Island and throughout New York State. Thank you for the opportunity to comment on this important renewable energy project.	Thank you for your comment.
BOEM-2022-0071-0065-0002	New York State is a leader in the fight against climate change and a national champion for offshore wind, having passed the strongest climate change law in the nation in 2019. The state is working towards achieving mandates of 70% renewable energy by 2030, carbon free electricity by 2040, and a net zero carbon economy by 2050. We cannot achieve these goals, particularly in downstate New York, without also achieving or exceeding our target of 9,000 MW of offshore wind. The Biden administration has announced plans to tackle climate change and put forth a goal of reaching a net-zero carbon economy by 2050. We must work aggressively to support responsibly-sited renewable energy projects like Sunrise Wind to meet these critical state and federal goals. CCE thanks BOEM for moving forward with the EIS and COP for Sunrise Wind.	Thank you for your comment.

Comment No.	Comment	Response
BOEM-2022-0071-0065-0003	New York City and Long Island are on the front lines of climate change. The NYSERDA white paper on the Climate Leadership and Community Protection Act asserts that one major obstacle the state faces to meet our climate change goals is that there is a “tale of two grids.” Upstate uses 88% zero-emission resources but only represents 1/3rd of the energy load, while downstate is 2/3rds of the load and 69% fossil fuels. The only way to see a just transition from polluting fossil fuels to renewable energy downstate is by utilizing offshore wind.	Thank you for your comment.
BOEM-2022-0071-0065-0004	To date, New York has selected five offshore wind projects which, if approved, will power over 2 million homes with clean, renewable energy and bring New York nearly halfway to our goal of 9,000 MW of offshore wind. These projects are also kickstarting an “offshore wind-ustry” in the state, which are already slated to create nearly 7,000 jobs in project development, manufacturing, installation, and operations and maintenance, while creating over \$12 billion in economic benefits to the state. They will also allow the state to close down antiquated, polluting fossil fuel fired power plants, which will improve air quality in our region and provide \$1 billion in health benefits to New Yorkers in vulnerable and frontline communities.	Thank you for your comment.
BOEM-2022-0071-0065-0005	Sunrise Wind will power over half a million homes on Long Island via a cable connection to the Holbrook Substation in Suffolk County. It is imperative that Sunrise Wind and the other projects are completed in an environmentally responsible manner, but it is also	Thank you for your comment.

Comment No.	Comment	Response
	critical that these projects move forward in a timely fashion if we are going to curb the worst impacts of climate change	
BOEM-2022-0071-0065-0006	CCE thanks BOEM for its thorough assessment of impacts to fish, birds and marine species, which should be mitigated to the greatest extent possible. However, the most immediate impact to these species is climate change. The real danger facing our beaches, fisheries, and coastal communities is not a wind farm, it is rising sea levels, ocean acidification, warming waters and extreme weather events.	Thank you for your comment.
BOEM-2022-0071-0065-0007	<p>These events continue to be a significant threat to downstate New York and to adversely impact our estuaries and our coastal communities. The environmental benefits of advancing offshore wind farms to reduce climate impacts needs to be weighed against any potential impacts associated with construction of offshore wind farms. CCE believes that offshore wind is one significant part of the antidote in fighting climate change. We cannot and should not put the antidote on pause while allowing impacts of climate change to intensify.</p> <p>Long Island and New York City are already experiencing the negative ecological and economic impacts of climate change. We need to be at the forefront of the transition to renewable energy and offshore wind development in the US.</p>	Thank you for your comment.
BOEM-2022-0071-0065-0008	The National Ocean and Atmospheric Administration (NOAA) predicts under a worst-case scenario a 6 ft sea level rise will cause most of the barrier islands and Long	Thank you for your comment.

Comment No.	Comment	Response
	<p>Island homes south of Merrick Road (route 27A) to be flooded or under water, with more than 150 municipalities impacted. Homes and infrastructure are already being raised, including roads in Freeport, Lindenhurst, Smithtown, and Southampton, as well as the Shelter Island ferry, while residents in the most vulnerable communities are facing managed retreat and home buyouts. These communities are in an exceptionally vulnerable position to extreme weather events.</p>	
<p>BOEM-2022-0071-0065-0009</p>	<p>Superstorm Sandy destroyed or damaged 95,000 buildings on Long Island and caused \$19 billion in damages to New York City. We are experiencing the increasing occurrence of “hundred-year storms” and increased precipitation during rain and snow events, and the problem will only get worse. NOAA predicts that in a worst-case sea level rise scenario, the average high tide in NYC will be 2 feet higher than the storm surge during Superstorm Sandy. Costs of repairing damage from extreme weather events like Superstorm Sandy and Hurricane Irene coupled with the need to raise homes and pay increased flood insurance premiums are impacting struggling homeowners in coastal communities. In addition to major storms, south shore communities are already experiencing “sunny day flooding” due to higher tides. This means on sunny day there is still street flooding and property damage.</p>	<p>Thank you for your comment.</p>
<p>BOEM-2022-0071-0065-0010</p>	<p>Extreme weather events are not our only challenge. Warmer winters coupled with longer, hotter summers are creating more hospitable conditions for invasive</p>	<p>Thank you for your comment.</p>

Comment No.	Comment	Response
	species, deer ticks and mosquitos that carry diseases, and reduced agricultural yields. Increased summer temperatures and more severe heat waves also degrade air quality, increase health care costs, and put lives at risk.	
BOEM-2022-0071-0065-0011	In the U.S., air pollution from burning fossil fuels leads to annual losses of \$600 billion and the loss of 230,000 lives. In NYC, approximately 130 residents die each year just from heat waves, with the number expected to rise over the coming century. Both Suffolk County and NYC regularly receive an “F” for air quality by the American Lung Association and experience disproportionately high rates of asthma, heart disease, and other chronic health issues in disadvantaged communities. Transitioning to offshore wind will significantly curb air pollution and provide quantifiable health benefits for New Yorkers. Air pollution reductions from the first 2,400 MW of offshore wind in New York would be valued at roughly \$1 billion and would avoid an estimated 100 premature deaths each year.	Thank you for your comment.
BOEM-2022-0071-0065-0012	Ocean acidity has increased 30% since the industrial revolution and there are documented negative impacts to sea scallops, squid, clams, oysters, and other species in the northeast.	Thank you for your comment.
BOEM-2022-0071-0065-0013	The catastrophic lobster die-off in the Long Island Sound is mainly attributed to warmer waters. The native lobster species and its historic maritime industry declined 90%. The industry used to account for tens of millions of dollars annually. The loss of this fishery is not only an economic loss but also means this historic	Thank you for your comment.



Comment No.	Comment	Response
	maritime culture is slipping away.	
BOEM-2022-0071-0065-0014	In our Scoping Comments, CCE urged BOEM to measure the potentially negative impacts of the offshore wind proposal against the impacts of remaining on fossil fuels and the potential climate change impacts that would result from a “No Action” alternative. We thank BOEM for this important inclusion in the DEIS, as the choice is not between wind and nothing, it is between wind and fossil fuels. Some of these findings under the “No Action” alternative are substantial and serve to illustrate that while all energy projects have some negative impacts, the impacts of doing nothing are significant and unacceptable.	Thank you for your comment.
BOEM-2022-0071-0065-0016	CCE also thanks BOEM for evaluating not only the potential adverse environmental impacts, but also the potential benefits including air quality improvements in disadvantaged communities due to decreased fossil fuel pollution, increasing fish habitat due to artificial reef effects, increased foraging for marine birds and marine mammals, and more. CCE urges BOEM to ensure these benefits and the expected climate change impacts under the “No Action” alternative are included in the final EIS.	Thank you for your comment. Beneficial impacts and climate change impacts are evaluated under all alternatives when applicable. An analysis of avoided emissions was included in the Final EIS and added to Section 3.4.9. The benefits of air quality improvements for environmental justice communities are mentioned in Section 3.17.4.2, <i>Cumulative Impacts of the No Action Alternative, Air Quality</i> under impact-producing factors. Potential impacts are considered for sea turtles, marine mammals, and sea birds.
BOEM-2022-0071-0065-0017	Sunrise Wind, along with the other previously selected offshore wind farms, will allow us to transition away from antiquated fossil fuel plants and protect coastal communities. If we are going to combat the local impacts of climate change and reduce air pollution in our Long Island and New York City neighborhoods, the DEIS makes it clear we are going to need responsibly-	Thank you for your comment.

Comment No.	Comment	Response
	sited offshore wind farms like Sunrise Wind.	
BOEM-2022-0071-0158-0002	Clarify in the purpose and need section that BOEM is not bound to consider approval only of projects that are large enough to meet existing state energy procurements.	Thank you for your response. BOEM has prepared the Purpose and Need statement in accordance with United States Department of Interior policy.
BOEM-2022-0071-0198-0001	<p>The New Bedford Port Authority ("NBPA") hereby submits these comments in response to the Bureau of Ocean Energy Management's ("BOEM") Request for comments relating to Draft Environmental Impact Statement for the Sunrise Wind Project.</p> <p>The aggressive timeline for offshore wind development in the Atlantic poses challenges for multiple industries and multiple jurisdictions. It is imperative that BOEM takes a holistic approach to the combined development of all projects. Uniformity is critical when reviewing and ruling on construction and operations plans (COP) on any individual development project.</p> <p>The Bureau of Ocean Energy Management's (BOEM's) Renewable Energy Lease Number OCSA 0487, is sited 18.5 statute miles (mi) (16.1 nautical miles [nm], 29.8 kilometers [km]) south of Martha's Vineyard, Massachusetts, and approximately 30 mi (26.1 nm, 48.2 km) east of Montauk, New York (NY).</p> <p>In considering a reasonable range of alternatives for this project, the NBPA continues to promote the responsible development of offshore wind and therefore a "No Action Alternative (Alternative A)" is not a practicable</p>	Thank you for your comment.

Comment No.	Comment	Response
	<p>substitute if we want to achieve the aggressive climate goals laid out by the federal and state governments. On the other hand, as representatives of the most profitable fishing port in the country driving an industry that employs over 7,000 people, we strongly support "Alternative C — Fisheries Habitat Impact Minimization." We are confident in BOEM's process to identify the best alternative under Alternative C (C-1 or C-2).</p>	
<p>BOEM-2022-0071-0198-0004</p>	<p>In summary, as the most profitable fishing port in the country, it is our mission to promote, facilitate, and defend the goals and needs of our commercial fishing community. We also support the development of offshore wind on our coast and have already played a big part in current and future projects, as evidenced by the port hosting the first purpose-built offshore wind terminal in the northeast and leading the nation as the first offshore wind marshalling port. The development of this new industry has the potential to create thousands of local jobs, promote port infrastructure, and go a long way in realizing the Commonwealth and the Nation's climate and renewable energy goals. We have been commenting on the environmental review not only for this project, but the many projects that are currently in the pipeline. Throughout, we continually stress that it is imperative to have a process where all voices are heard so that we shall have the most responsible development of this new industry and ensure that both the commercial fishing and offshore wind sectors thrive for decades to come.</p>	<p>Thank you for your comment.</p>

Comment No.	Comment	Response
	<p>We appreciate to opportunity to provide comments on the EIS for the Sunrise Wind COP and look forward to the continued working relationship we have developed with BOEM and the offshore wind industry to ensure that all affected industries and communities continue to grow and thrive as we undertake this ambitious environmental and economic effort.</p>	
<p>BOEM-2022-0071-0205-0028</p>	<p>Environmental protection is a key requirement under the OCSLA and NEPA and rigorous plans must be in place for offshore wind projects to comply with various state and federal statutes that projects are subject to. Offshore wind energy must be developed in an environmentally responsible manner that avoids, minimizes and mitigates impacts to marine life and ocean users, meaningfully engages stakeholders from the start, and uses the best available science and data to ensure science-based and stakeholder-informed decision making. This includes analysis of cumulative impacts and adaptive management strategies, obtaining all necessary and relevant data and identifying all methodologies and indicating when information is incomplete or unavailable, acknowledging scientific disagreement and data gaps, and evaluating intermediate adverse impacts based on approaches or methods generally accepted in the scientific community. Avoiding sensitive habitat areas, requiring strong measures to protect wildlife throughout each state of the development process, and comprehensive monitoring of wildlife and habitat before, during, and after construction, are all essential for the responsible</p>	<p>Thank you for your comment.</p>

Comment No.	Comment	Response
	<p>development of offshore wind energy. The combination of project alternatives should be chosen that ensures communities, wildlife, and the environment are protected while maximizing the creation of quality, high-paying jobs and economic benefits.</p>	
<p>BOEM-2022-0071-0206-0001</p>	<p>We write to you on behalf of the members of the Business Network for Offshore Wind (the Network) to provide comments on the Sunrise Wind Draft Environmental Impact Statement [BOEM-2022-0071] published in the December 16, 2022 Federal Register.</p> <p>The Network is the largest nonprofit organization solely focused on the development of the offshore wind industry and its supply chain. Since 2013, the Network has brought together business and government, both domestically and internationally, to educate and to prepare companies and small businesses to enter the offshore wind market. The Network uses the voice of its members to educate and support federal, state, and local policies to advance the development of the U.S. offshore wind industry. The Network empowers its members with the education, tools, and connections necessary to participate in this booming industry.</p> <p>The Network commends BOEM on its decade of work bringing the Sunrise Wind project forward and recent advancement of a Draft Environmental Impact Statement as proof of the Biden-Harris Administration’s clear interest in advancing the U.S. offshore wind industry. Development of the Sunrise Wind project will</p>	<p>Thank you for your comment.</p>

Comment No.	Comment	Response
	<p>make important contributions towards national and state offshore wind goals and the establishment of a local supply chain.</p>	
<p>BOEM-2022-0071-0206-0002</p>	<p>Advancement of this project is in the declared public interests of the United States and the state of New York. Presidential Executive Order No. 14008, issued on January 27, 2021, states it is the policy of the United States to combat the climate crisis, reduce climate pollution in every sector of the economy, and spur well-paying jobs and economic growth especially through the development of clean energy technologies and infrastructure. Furthermore, the executive order specifically calls on the Secretary of the Interior to review permitting processes in offshore waters to increase renewable energy production in those waters, with the goal increasing offshore wind power in the United States to 30 GW and creating good jobs.</p> <p>The project is designed to contribute to New York’s offshore wind energy goal. The Sunrise Wind farm is expected to begin construction soon after BOEM’s approval and can begin providing necessary renewable energy to New York. Sunrise Wind is expected to begin commercial operations in late 2025 with a total capacity of up to 1,034 megawatts (MW). Sunrise Wind’s annual production will be enough to power approximately 600,000 average New York homes. In addition, Sunrise Wind can play a key role in helping New York meet the state’s goals outlined in the 2019 Climate Leadership and Community Projection Act. The project represents a</p>	<p>Thank you for your comment.</p>

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	<p>significant step towards meeting the state’s goal of 70% of the state’s electricity generated from renewable sources by 2030. Moreover, Sunrise Wind will fulfill 11% of New York’s overall offshore wind goal of 9,000 MW by 2035. By moving forward with the approval of the Sunrise Wind and completing the draft environmental impact statement BOEM is driving New York’s offshore wind program one step closer to having steel in the water and helping the state meet its clean energy goals.</p> <p>The Network supports BOEM’s deliberate consideration and commitment to environmental protection. The Network encourages BOEM to continue moving the Sunrise Wind project forward with the recognition of the enormous environmental and economic benefits the project offers, especially compared to a “No Action” alternative. Net reductions in air pollutant emissions resulting from the Proposed Action are expected to contribute to long term benefits for communities by displacing emissions from fossil fuel generated power plants. Sunrise Wind project as proposed would result in annual avoided emissions in NOx (1,474 tons), SO2 (1,534 tons), VOCs (106 tons), PM2.5 (471 tons), and CO2 (2,592,802 tons) (COP p 4-141)</p>	
BOEM-2022-0071-0206-0003	The Biden Administration has taken significant actions to bring transparency and predictability to the offshore wind leasing and permitting process, including the full federal permitting approval of Vineyard Wind and the issuance of the Record of Decision for South Fork Wind. BOEM and the Department of Interior are already taking	Thank you for your comment.

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	<p>steps to build that long-term pipeline by releasing a longer-term leasing plan Path Forward 2021-2025 for offshore wind leasing in U.S. waters. Just last week, the Department of Interior announced new proposed regulations that would modernize offshore wind processes in order to decrease costs and market uncertainty.</p> <p>In the face of growing global demand, sending clear market signals to attract investment to the U.S. is critical to ensuring U.S. offshore wind deployment goals are met. The Demand for a Domestic Offshore Wind Energy Supply Chain, a report published by NREL, studied the capacity to fulfill the administration’s deployment goal of 30 GW by 2030 and found “additional facilities will be required to achieve a fully domestic offshore wind supply chain.” This fact takes on increasing importance as the report notes it is “unlikely that international suppliers will have sufficient throughput to support the construction of both European and U.S. offshore wind energy projects.” Accordingly, if the U.S. does not develop a robust domestic offshore wind supply chain, surging global demand for offshore wind project components, services, and raw materials could prevent the U.S. from reaching state and federal offshore wind deployment targets. A follow-up report released earlier in 2023 found that the U.S. market would require \$6 billion in new investments in factories, ports, vessels, etc., to ensure the nation matches its 30. GW buildout. And up to \$22.4 billion to build out a sustainable</p>	



Comment No.	Comment	Response
	<p>domestic supply chain.</p> <p>Encouragingly, actions by the Department of Interior are already driving substantial investment decisions. The Network closely tracks the market and found that public and private investors committed \$2.2 billion in new funding in 2021, including commitments to develop nine major component facilities that will manufacture the foundations, towers, cables and blades of offshore wind turbines. In 2022, the market generated \$5.44 billion in new lease revenues for the U.S. government, reflecting an increased investor confidence in the U.S. market which will be crucial to a full build-out of the U.S. industry. Advancing Sunrise Wind is crucial to maintaining this momentum.</p>	
BOEM-2022-0071-0206-0004	<p>The global offshore wind industry is growing exponentially, which will further strain global supply chains. In 2021, market analysts predicted global offshore wind capacity would reach 270 GW by 2030, in line with Network calculations of 254 GW by 2030. With only 57.2 GW installed by the end of 2021 (after 30 years of offshore wind development) the global market was facing a steep installation curve in order to reach Netherlands and Germany agreed to increase their offshore wind capacity “fourfold” by 2030 – equating to 50 GW of new capacity in nations with only 15 GW currently installed. British Prime Minister Boris Johnson called for increasing his nation’s targets to 50 GW by 2030, a 25% increase over current targets. According to Renewable UK, the global pipeline of offshore wind</p>	Thank you for your comment.

Comment No.	Comment	Response
	<p>demand doubled in a year.</p> <p>Actions that delay project timelines must be avoided to the greatest extent possible. Project investments are ongoing and demand for materials, skilled labor, and critical equipment is dependent upon timely implementation. The Network urges BOEM to advance the Sunrise Wind project on its timeline.</p>	
<p>BOEM-2022-0071-0206-0005</p>	<p>In building out offshore wind in the U.S., Sunrise Wind project developer Orsted has invested \$2 billion into the U.S. economy and has a supply chain touching upon 41 states. (See <a href="https://us.orsted.com/our-impact/supply-chain">https://us.orsted.com/our-impact/supply-chain</a>) The proposed project is already directly contributing to the formation of a U.S. supply chain, and major investments are dependent on its advancement.</p> <p>The port investment alone will have substantial impacts on redevelopment efforts in two different regions in New York as well as in the State of Connecticut. Construction and operation of Sunrise Wind will create more than 800 direct jobs and over 1200 indirect jobs in New York.</p> <p>Construction and operation of Sunrise Wind will result in direct investment of more than \$400M in New York state. To bolster their commitment to the project, Sunrise Wind is providing \$10 million to launch a national offshore wind training center at Suffolk Community College and \$5 million for a research and development partnership with Stony Brook University. As part of the project a steel fabricator in Western New</p>	<p>Thank you for your comment.</p>

Comment No.	Comment	Response
	<p>York will fabricating anode cages to create at least 100 jobs. The anodes will be assembled with foundation components in the Capital Region, seeding a supply chain that can continue to serve additional offshore wind project creating 230 jobs at Port of Coeymans. Orsted/Eversource is creating an operations and maintenance (O&amp;M) hub at Port Jefferson that will be the home port of a Service Operation Vessel that will support maintenance and operation of the developers' portfolio of projects in the northeast.</p> <p>Because of the size of this project, in addition to the two ports mentioned above, Orsted/Eversource and the federal government are investing \$255 million into the Port of New London to develop it as a staging and assembly port and a \$90 million investment at the Port of Davisville-Quonset to be used for operations and maintenance. The Sunrise Wind project is also supporting the building of the first US-built service operations vessel (SOV) and 5 crew transfer vessels; the SOV will be built by Edison Chouset's shipyards in Louisiana, Mississippi and Florida, and supplies for the vessel will be sourced in 12 states. In addition, the company has entered into a charter agreement to use the first Jones Act qualified wind turbine installation vessel, the Charybdis, a \$550 million vessel being constructed in Brownsville, Texas. Additionally, the New York workforce and more broadly domestic workers will gain entry into the offshore wind workforce and receive invaluable experience to be applied in future projects.</p>	

Comment No.	Comment	Response
BOEM-2022-0071-0206-0006	<p>The Network begins by commending BOEM for recognizing the importance of state public policy by maintaining a commitment to achieve up to 1,034 MW with 94 WTG, delivering clean power to New York. While the Network appreciates environmental and fishing deconflicting considerations undertaken during the process including impacts to complex fish habitats, it is clear that pursuing either Alternative C1 or C2 do not offer significant benefits over Alternative B and could lead to unneeded project delays as shown in the analysis. The DEIS notes the fishing activity in the Lease Area accounts for a very small percentage (0.16 percent) of the total revenue across all fisheries covered by a Fishery Management Plan in the Mid-Atlantic and New England region. The DEIS notes that 75% of commercial vessels fishing the lease area derived less than 1% of their total annual revenue from the lease area, an incredibly low number. (DEIS 3-412). This is demonstrated by the fact that there is no change in impact to commercial and forhire recreational fisheries when comparing the proposed Action to the two alternatives C-1 and C-2. (ES-xi). We emphasize the importance of maximizing the capacity to deliver energy from the project in order to achieve present and future commitments while reducing costs, amplifying community benefits and safeguarding the environment. Furthermore, the Network encourages BOEM to think about holistic economic and environmental impacts when considering alternatives.</p> <p>The Network recommends that BOEM implement the</p>	Thank you for your comment.

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	<p>goals of Alternative B, while recognizing, based on the valuable input that BOEM has received during the process, there may be ways to improve upon the project while ensuring the timeline continues to move forward without delay.</p>	
<p>BOEM-2022-0071-0206-0007</p>	<p>The Business Network for Offshore Wind and its members strongly encourage BOEM to maximize the ability of the lease area to generate and transmit as much electricity as possible to support the national and state of New York goals for renewable energy delivered to the grid. According to the Biden Administration, “More opportunities are ahead, including an estimated \$109 billion revenue opportunity across the offshore wind supply chain this decade, and East Coast Governors are laying the groundwork to seize them. Having already set commitments to procure nearly 40 GW of offshore wind, these states are providing a strong demand signal for clean energy that will lower energy costs for American families while protecting them from volatile fossil fuel price spikes.”</p> <p>Equally important, the Network urges BOEM to focus on avoiding delay in project implementation that could threaten already challenged supply lines and postpone needed employment. These employment opportunities will directly benefit the residents in the region in which the project is proposed. BOEM noted that “there will be notable and measurable benefits to employment, economic output, infrastructure improvements, and community services, especially job training, because of</p>	<p>Thank you for your comment.</p>

Comment No.	Comment	Response
	<p>offshore wind development.” The air quality and other environmental benefits resulting from expanding renewable energy resources cannot wait. The impacts of Sunrise Wind’s current design are materially no different than the alternatives analyzed in the DEIS.</p> <p>The Network strongly recommends moving forward with the proposed action in the DEIS and approval of Sunrise Wind’s COP.</p>	
BOEM-2022-0071-0229-0004	<p>BOEM’s Purpose and Need for the proposed Project is convoluted and restrains meaningful NEPA review, as well as OCSLA compliance. BOEM’s purpose and need section focuses exclusively on Sunrise Wind’s goal to install a 1,034 MW facility, satisfying Sunrise Wind’s “obligation” to NYSERDA for providing 924 MW of offshore wind energy, the Administration’s goal to deploy 30 GW of offshore wind by 2030, and consideration of the goals of the applicant (which of course will be to build the full potential of the entire lease area). First of all, Sunrise Wind’s “obligation” to NYSERDA was a speculative contract entered into prior to any federal review of the proposed Project and cannot bind BOEM’s analysis. BOEM cannot subjugate its NEPA and OSCLA duties to a speculative contract signed by the developer. It is BOEM’s duty to analyze various Alternatives and comply with OSCLA standards, not to comply with the developer’s and NYSERDA’s speculative contracts or “obligation”. Otherwise, and as is detailed in the analysis of the DEIS regarding Alternatives considered but rejected and the limits of its analysis,</p>	<p>Alternative C3 has been added, which looks at developing only what is necessary to meet the contracted goals with NYSERDA and not building out the entire Lease Area.</p>

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	<p>BOEM itself has become party to that contract, which is wholly inappropriate and illegal. BOEM’s responsibilities as a government agency do not change regardless of private speculation. If a homeowner in a town signed a contract with a carpenter to build a 12x12 foot shed in their backyard prior to applying for a town permit for the shed, and if upon reviewing the application the town ruled that according to its permitting rules that the homeowner could only be authorized to build a 10x10 foot shed, the speculative contract of the homeowner and the carpenter would have to be adjusted to fit the town’s permitting requirements, not the other way around. Otherwise the town would be abandoning its permitting rules and procedures in order to fulfill a private contract. A private contract that was created outside the realm of any town rules and regulations and based on pure speculation. It is no different here.</p>	
<p>BOEM-2022-0071-0232-0001</p>	<p>The DEIS cites the Executive Order 14008 to justify the purpose and need of the project. This order specifically includes the necessity to tackle the climate crisis both at home and abroad. The DEIS does not comply with this executive order because it fails to consider the global (abroad) ramifications of the project.</p> <p>a. Climate change is a global, not a local problem. No DEIS should ignore the global environmental costs of a project. This DEIS fails to consider emissions from abroad, including the manufacturing, transportation, concrete production (Miller, 2020), and mining that will occur outside of the local region for the project. Given the executive order’s specific inclusion of “abroad,” the</p>	<p>BOEM has authority under the Outer Continental Shelf Lands Act (OCSLA) to authorize renewable energy activities on the OCS. The purpose of BOEM’s action is to determine whether to approve, approve with modifications, or disapprove Sunrise Wind’s COP, not to regulate global climate change. The construction and operation of offshore wind projects will produce air and GHG emissions. Life cycle assessments for renewable energy are an area of ongoing research and investigation. Life cycle assessments for wind energy have shown that these emissions remain significantly lower than the GHG emissions from fossil fuel energy generation (e.g., NREL 2021,</p>

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	<p>DEIS cannot ignore the emissions from these operations or the environmental costs of these activities.</p> <p>b. The DEIS assumes the wind energy generated over the lifespan of the project will “likely” offset the carbon emissions resulting from construction, installation, maintenance, and operations. Analysis of real-world data does not support this assumption. Studies demonstrate that wind-generated energy replaces less than one-tenth the amount of fossilfuel-generated electricity (Jorgensen, 2012; York, 2012). The real-world replacement value of wind energy for fossil-fuel-generated electricity undermines the assumption that this project will mitigate climate change.</p> <p>If BOEM uses a 10% or less replacement value and includes foreign as well as domestic carbon emissions and environmental damage, the project would likely add more to the climate problem than detract from it. This lack of climate change mitigation invalidates all of DEIS’s subsequent environmental assessments that assume a net positive effect on GHG emissions.</p>	<p><a href="https://www.nrel.gov/docs/fy21osti/80580.pdf">https://www.nrel.gov/docs/fy21osti/80580.pdf</a>). Sunrise Wind submitted an OCS Air Permit Application which included air dispersion modeling and emission estimates in February 2023. Information from these additional analyses will be included in the Final EIS. In addition, the Final EIS will include estimates of the avoided CO<sub>2</sub> emissions over the lifetime of the Project compared to the alternatives.</p>
BOEM-2022-0071-0232-0003	<p>The statement of purpose adds to the inadequacy of the “no-action” alternative. In the statement of purpose, the DEIS justifies the project based on its ability “to provide a commercially viable offshore wind energy project within the Lease Area to help New York achieve its renewable energy goals (1-8).” Given that NY has mandated an energy transformation, comparing the project to a “no-action” alternative is capricious and invalid.</p>	<p>The No Action Alternative is a viable alternative. New York's energy goal does not mean this Project will move forward.</p>



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BOEM-2022-0071-0232-0034	<p>In sum, BOEM should not approve this project. Sunrise Wind may help NY meets its mandate, but it will not uphold the standards of the Executive Order to preserve biodiversity, promote economic development, protect public health, ensure environmental justice and conserve the marine ecosystem. It will violate both the ESA and the MMPA. Moreover, it does not fulfill the mandate to tackle climate change either locally or globally. BOEM cannot recklessly decide which laws to obey and which to ignore, just because of a misguided desire to help climate change. A united effort will only work within the limits of the law. Furthermore, a mark of a civilized state depends on the degree to which the state protects the poorest, most vulnerable members of society, even if those members are marine mammals, endangered eagles, or threatened birds</p>	<p>Thank you for your comment.</p>
BOEM-2022-0071-0232-0035	<p>This DEIS does not fulfill the executive order, 40018. But, even if it did fulfill the goal of the order, it cannot do so without violating the law of the land. Overriding the MMPA and the ESA to achieve the executive order represents an unacceptable expansion of executive powers. Perhaps this makes sense to BOEM in light of the climate crisis. But, what happens when the next President wants to cut through the same red tape, and override the same laws, but for a different agenda? What then? We, as a country, cannot afford to have a short memory. We need to remember that executive power, in the hands of the wrong person, can use the same precedents, but for different aims. BOEM's decision could have long-reaching negative impacts on</p>	<p>Thank you for your comment. The EIS will not override the MMPA or the ESA. Consultation documents with the USFWS and NMFS have been developed and BOEM is working closely with these agencies to reduce or eliminate impacts on species of concern.</p>

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	our democracy as well as our environment.	
BOEM-2022-0071-0242-0001	<p>On behalf of the National Wildlife Federation, Natural Resources Defense Council, Conservation Law Foundation, National Audubon Society, All Our Energy, American Bird Conservancy, Audubon New York, Connecticut Audubon, Mass Audubon, Nassau Hiking &amp; Outdoor Club, New Jersey Audubon, NY4WHALES, Ocean Conservation Research, Save the Sound, South Shore Audubon Society, Surfrider Foundation, and our millions of members and supporters, we submit these comments on the draft Environmental Impact Statement (DEIS or Draft EIS) by the Bureau of Ocean Energy Management (BOEM) for the Construction and Operations Plan (COP) produced by Sunrise Wind, LLC for the construction and operation of a wind energy facility offshore of New York, Massachusetts, and Rhode Island (the Project, Sunrise Wind).</p> <p>Climate change poses a global threat, with impacts to the United States as a whole, as well as to individual states and local communities. Actions to advance clean renewable energy are necessary to avoid the worst impacts of climate change on communities and wildlife. The Biden-Harris Administration has set a goal to deploy 30 gigawatts (GW) of offshore wind by 2030; New York State, which is the offtaker for Sunrise Wind’s electricity, plans to procure 9,000 megawatts (MW) of offshore wind by 2035 and currently has five projects in various stages of development totaling 4,300 MW. In February, New York held a record setting lease sale of six leases in</p>	Thank you for your comment.

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	<p>the New York Bight garnering \$4.37 billion.<sup>2</sup> Our organizations support these national and state offshore wind goals and actions and recognize the role that Sunrise Wind will play in bringing 1,034 MW of clean renewable energy to New York.</p> <p>Collectively, we advocate for policies and actions to bring offshore wind to scale in an environmentally protective manner and believe that permitting Sunrise Wind offers a critical opportunity to set a high standard for project development and environmental review. Responsible development of offshore wind energy: (i) avoids, minimizes, mitigates, and monitors adverse impacts on wildlife and habitats, (ii) minimizes negative impacts on other ocean uses, (iii) includes robust consultation with Native American tribes and communities, (iv) meaningfully engages state and local governments and stakeholders from the outset, (v) includes comprehensive efforts to avoid impacts to underserved communities, and (vi) uses the best available scientific and technological data to ensure science-based stakeholder-informed decision making.</p>	
BOEM-2022-0071-0242-0002	<p>The Project will be a commercial scale wind facility consisting of up to 94, 11-MW turbines, an offshore open loop cooling converter station (OCS-DC), interarray cables, an onshore converter station (OnCSDC), an offshore transmission cable, and an onshore interconnection cable.</p> <p>If the COP is approved, Sunrise Wind would help the</p>	Thank you for your comment.

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	<p>state of New York to achieve not only its aforementioned offshore wind goal, but also the equally ambitious goal to generate 70 percent of electricity from renewable resources by 2030. While the Project will provide significant benefits to New York, it is also important to address the potential negative impacts to the unique habitats and wildlife of the state of New York, the New York Bight, as well as to the habitats in the Southern New England Region of the Atlantic Outer Continental Shelf (OCS). All offshore wind activities should proceed with strong protections in place for habitats and wildlife, using science-based measures to avoid, minimize, mitigate, and monitor impacts on valuable and vulnerable wildlife and ecosystems.</p> <p>We submit the following comments to guide BOEM in meeting its obligations under the National Environmental Policy Act (NEPA) in finalizing its EIS for Sunrise Wind.</p>	
BOEM-2022-0071-0242-0079	<p>Our review of the Sunrise Wind Draft EIS and recommendations are focused on the responsible advancement of the offshore wind industry as a critical component of combating climate change. Our comments serve to collaborate with the agency to employ scientifically sound, productive and protective measures to avoid, minimize, mitigate, and monitor impacts of offshore wind on wildlife and habitat. We thank BOEM for their consideration of our comments and for their efforts to meet the clean energy needs of the people of New York.</p>	Thank you for your comment.

Comment No.	Comment	Response
BOEM-2022-0071-0248-0024	<p>In prior comment letters, we have been critical of the lack of information provided in previous DEIS. We appreciate these DEISs providing some of the information we have requested in those letters. For example, CVOW intends to utilize 14MW to 16MW turbines while Sunrise proposes 11MW. We recommend an alternative be added to the Sunrise DEIS that considers utilization of turbines like those proposed in CVOW, making the geographic footprint, in terms of WTGs deployed, smaller. This, in turn, could assist in the avoidance and/or minimization of impacts resulting from the project. This alternative should be considered and made clear to the public as turbine size is fundamental to the number of turbines that will be used in a project area.</p>	<p>Thank you for your comment. The only WTGs proposed in the PDE are 11-MW WTGs. Other WTG sizes were considered but eliminated for consideration, which is described in Table 2.1-1.</p>
BOEM-2022-0071-0248-0025	<p>Avoidance is the first step of impact minimization under NEPA. For the fishing industry, avoidance is most readily achieved by constructing the fewest turbines, as turbines will displace fishing activity. Power agreements often drive the number of turbines a developer will use in a lease area, but size also influences how many turbines will be needed. Clearly the developer has an anticipated turbine size they intend to use as the number of turbines and wind farm capacity are stated in Appendix E of the DEISs. Therefore, the turbine size should be easily available in the Executive Summary of the DEIS. Should the developer anticipate using the largest turbines available at the time of construction, this should be clearly stated and a range of anticipated turbine size should still be provided.</p>	<p>WTG size is discussed in the <i>Executive Summary</i> under <i>Alternative B - Proposed Action</i>, as well as throughout the Final EIS.</p>

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BOEM-2022-0071-0249-0001	<p>The Newport Parties and Block Island Parties have consistently expressed their support for responsible wind energy development and the growing need for sustainable energy sources in Rhode Island as well as the United States. Their aim in consultation with BOEM is to ensure that BOEM’s permitting process follows the law, and that BOEM selects an alternative that preserves the integrity of the project’s surrounding area to the greatest extent possible. BOEM, however, has a responsibility under federal law to resolve all adverse effects to Newport’s and Block Island’s historic properties, which include some of the nation’s best preserved and highly valued National Historic Landmarks such as the Bellevue Avenue Historic District, Ocean Drive Historic District, The Breakers, Marble House, and Southeast Lighthouse, along with myriad historic properties listed in the National Register of Historic Places such as those on Block Island</p>	<p>Thank you for your comment.</p>

**O.6.24. National Environmental Policy Act/Public Involvement Process**

**Table O-32. Responses to Comments on the National Environmental Policy Act/Public Involvement Process**

Comment No.	Comment	Response
BOEM-2022-0071-0147-0001	I have submitted many written comments over the years, attended many public hearings and provided public testimony. During all of which I, and many others, have stressed the need for proper baseline studies to be carried out prior to construction. This has not happened.	Thank you for your comment.
BOEM-2022-0071-0147-0002	We have also advocated for cumulative impacts to be analyzed; this has not happened.	A cumulative impact analysis was included within the Sunrise Wind Draft EIS and Final EIS. Sections 1.6 and 2.1.1 discuss how the cumulative impacts are analyzed.
BOEM-2022-0071-0147-0003	I understand the need for alternative energy, but I do not think it should be rushed and as a result put another ecosystem at risk for its development.	Thank you for your comment.
BOEM-2022-0071-0147-0004	While reading through the different alternative's impacts I noticed that the "No Action" alternative refers to the instance when the Sunrise Wind project isn't built, but the surrounding offshore wind farms are. I think this is deceiving. The "No Action" alternative in all DEIS's should be a true no action, as in no offshore wind construction is approved and carried out and construction is compared to the current non-developed state.	Sections 1.6 and 2.1.1 discuss how the cumulative impacts and the No Action Alternative are analyzed. Only already approved wind farm projects are included in the baseline for the No Action Alternative.
BOEM-2022-0071-0147-0006	At this point I cannot support any of the alternatives listed in this DEIS. I support a true no action until proper baseline studies and cumulative impacts are carried out and analyzed. I truly believe that that is the best path forward for the	The "true no action" for this EIS is that this Project would not be approved to move forward, which is analyzed in this EIS as the No Action Alternative. The No Action Alternative does consider the baseline conditions, which have already permitted projects and other marine resource uses. In addition to this, we analyzed the

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	environment.	cumulative impacts of all the proposed projects being developed in the absence of this Project. Sections 1.6 and 2.1.1 discuss how the cumulative impacts and the No Action Alternative are analyzed.
BOEM-2022-0071-0158-0001	<p>Given the current pace of offshore wind energy development in this region and workload constraints, we are unable to provide a detailed review of this project and the DEIS. For example, this comment period overlaps with comment periods on DEIS documents for three other wind projects in our region as well as BOEM’s Renewable Energy Modernization Rule and the Coast Guard’s Port Access Route Study for Approaches to Maine, New Hampshire, and Massachusetts. The analysis in the DEIS has important ramifications for terms and conditions which may be implemented through final project approval, including fisheries mitigation and compensation measures. With this in mind, we strongly encourage BOEM to consider the recommendations listed in the wind energy policies adopted by both Councils, which apply across all projects. Our two Councils worked together on and adopted the same wording for these policies. We also urge BOEM to adopt the recommendations provided by NOAA Fisheries for this project, including recommendations regarding data considerations, impacts analysis, and ways to minimize the negative impacts of this project on marine habitats, commercial and recreational fisheries, and fishery species.</p>	<p>Thank you for your comment and we apologize for the difficult commenting period. BOEM is working closely with NOAA fisheries (NMFS) to develop alternatives to reduce impacts on the fisheries' habitats. Your comments and recommendations are considered in this EIS.</p>



Comment No.	Comment	Response
BOEM-2022-0071-0158-0003	Clarify how alternatives can be combined, namely C1 and C2 along with the C-2a through C2d sub-options, and which turbine placements would be removed from consideration under each.	Alternatives can be combined to best reduce impacts during the Record of Decision. The decision maker will use information from the EIS to make the most informed decision when determining which Alternative, or combination of alternatives, to consider.
BOEM-2022-0071-0158-0004	Analyze the impacts of all action alternatives in detail, including Alternatives C1 and C2, not just the no action and proposed action.	All alternatives are analyzed for each resource area; however, since the nature of Alternatives C1 and C2 is to reduce habitat impacts, some resources will not be impacted when compared against the No Action Alternative and Proposed Action. For example, coastal fauna would have no impacts under Alternatives C1 or C2 because no changes to coastal fauna occur under these alternatives. In this scenario, impacts are the same as the Proposed Action, which is stated concisely in the EIS to save the reader time and reduce the page limit instead of rewriting the initial analysis under the Proposed Action.
BOEM-2022-0071-0158-0005	State if impacts are beneficial or adverse.	Impacts are assumed to be adverse unless stated that they are beneficial.
BOEM-2022-0071-0158-0009	The National Environmental Policy Act requires consideration of a range of alternatives which could meet the defined purpose and need for the action. Section 1.2 of the DEIS (Purpose and Need of the Proposed Action) notes that Sunrise Wind can produce up to 1,034 MW of electricity and the project is already obligated to provide 880 MW (up to a maximum of 924 MW) to the state of New York. Each action alternative in the DEIS (i.e., Alternatives B, C-1, and C-2) includes up to 94 wind turbine generators and could produce up to 1,034 MW of electricity. The minimum number of turbines and the minimum total MW of energy generation required to meet the purpose and need	Thank you for your comment. This comment has been addressed under Alternative C-3 by looking at the lower and upper ranges of the NYSEDA agreement (880 MW, 924 MW, and 957 MW). Additionally, language was added to Section 1.2 stating, "BOEM is not bound to consider approval of projects that are only large enough to meet existing state energy procurements".

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	<p>is unclear. This poses challenges for determining which final configurations of the alternatives could meet the purpose and need while reducing the negative environmental and socioeconomic impacts of the project.</p> <p>We are concerned about the implication that only alternatives which would generate the full procured amount of electricity could meet the purpose and need. This interpretation is inconsistent with the purpose and need as written. This could limit BOEM’s ability to reduce the potential negative environmental impacts of the project by considering approval of a smaller project than that proposed by the developer. We suggest that Sunrise Wind’s FEIS and future DEIS and FEIS documents for other projects more clearly indicate that the agency is not bound to consider approval only of projects that can produce a certain amount of electricity. BOEM should consider federal and state renewable energy targets as well as existing procurements when preparing an EIS and determining whether to approve a project. However, it should be made clear that BOEM can approve a project that is smaller than what was proposed or procured. We suggest expanding on this to make it clear that the project will avoid risks to the health of marine ecosystems, ecologically and economically sustainable fisheries, and ocean habitats. BOEM should clearly acknowledge that if</p>	

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	these risks cannot be avoided, they should be minimized, mitigated, and compensated for.	
BOEM-2022-0071-0158-0034	The FEIS, and all future NEPA documents for other wind projects, should specify if an impact is adverse or beneficial. The DEIS indicates that impacts are adverse unless specified as beneficial. However, some impact producing factors (e.g., presence of structures) are expected have both adverse and beneficial impacts (e.g., adverse for soft bottom species and beneficial for structure-oriented species). The clarity of these descriptions would be improved if “adverse” or “beneficial” were specified for each impact, or, at a minimum, at the beginning of each section. This should be done consistently throughout all sections of the document.	All impacts are assumed adverse unless is it stated that they are beneficial, as stated in Section 2.4 and Section 3.3.
BOEM-2022-0071-0229-0001	BOEM's release of the Sunrise Wind DEIS on December 12, 2022, right before the Christmas holidays, and simultaneously with the Empire Wind DEIS comment period, New England Wind DEIS comment period, Coastal Virginia Offshore Wind DEIS comment period, the state’s RFI for a Regional Administrator for fisheries compensation comment period, two 3- 5 day Mid Atlantic Fishery Management Council meetings, and a 3 day New England Fishery Management Council meeting seems to be designed to prevent meaningful participation of the commercial fishing industry in the BOEM process for all of these projects, including Sunrise Wind. The commercial fishing	Release of the Draft EIS at this time was not designed to prevent meaningful participation from public or consulting parties, we value your input and apologize for the difficult timing.

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	<p>industry does not have an army of staff, as does BOEM, to exclusively focus on each DEIS. Additionally, commenting on offshore wind is not our sole job description. BOEM is fully aware of the dates of the Fishery Management Council meetings, as it attends many of them, including those which occurred during the Sunrise Wind comment period. Meeting fatigue, combined with the fact that there are only so many hours in a day to attempt to read through the thousands of pages of BOEM DEISs and associated documents makes full comments on each DEIS impossible. Therefore, these comments will be significantly abbreviated compared to comments that would be prepared if BOEM allowed more time for comment and/or more spacing between DEIS releases. As the public stakeholders with the most to lose from offshore wind, we request that BOEM extend the public comment period for Sunrise Wind and well as all the other proposed Project DEISs to allow for true public participation in the BOEM process.</p>	
BOEM-2022-0071-0229-0002	<p>The Sunrise Wind DEIS is one of the least detailed of several DEISs that we have reviewed thus far, and lacks a standalone and/or detailed cumulative impacts analysis. Impacts are generalized, very rarely quantified, and those that are quantified are quantified in a general and not specific manner. This makes detailed and specific comment, or weighing of alternatives, impossible. BOEM does not provide enough detailed information to</p>	<p>Thank you for your comment. At this time a supplemental Draft EIS will not be released but your concerns are noted and more detail regarding the cumulative impacts is included in the Final EIS.</p>

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	<p>differentiate between alternatives and associated impact producing factors, leading essentially to conclusions that all impacts are the generally the same. Reality dictates that this is not the case. For example, Table ES-2, “Summary and Comparison of Impacts among Alternatives with No Mitigation Measures” concludes that No Action will have the same impacts to Water Quality as all of the Action Alternatives, despite the proposed Project containing an open cooling water intake system for its offshore converter station (OCS-DC) that would release 8.1 million gallons of 90 degree F effluent on a daily basis. In another example, Table ES-2 “Summary and Comparison of Impacts among Alternatives with No Mitigation Measures” concludes that No Action will have the same impacts to Benthic Resources as all Action Alternatives. Pile driving up to 94 turbines into the ocean floor and laying 285 miles of cables creates impacts to benthic resources that would not exist if a developer was not pile driving 94 turbines into the ocean floor and laying 285 miles of cables. BOEM’s conclusions make no sense, and result from lack of detailed analysis. Lack of detailed and quantitative analysis makes weighing of Alternatives impossible and all of BOEM’s conclusions flawed. We request that BOEM release a supplemental DEIS that contains more finely detailed information and appropriate specific, not generalized, analysis that differentiates between</p>	

Comment No.	Comment	Response
	alternatives.	
BOEM-2022-0071-0229-0003	<p>BOEM continues to conflate the No Action Alternative with a Cumulative Impacts Analysis. This makes comparison of No Action with the Cumulative Impacts Analysis impossible as a practical matter, and the document does not contain any charts, tables, or methodology by which a Cumulative Impacts Analysis was conducted. The No Action Alternative contains “impacts from ongoing activities” as the “baseline against which the direct and indirect impacts of all action alternatives are evaluated”, and states that “other reasonably foreseeable future impact-producing offshore wind and non-offshore wind activities would be implemented, which would cause changes to the existing baseline conditions even in the absence of the Proposed Action”. This is not a No Action Alternative. This is a Cumulative Impacts Alternative. BOEM cannot create a “baseline” of cumulative impacts. Cumulative impacts are future foreseeable impacts, not current baselines.</p> <p>The document even states this: “The continuation of all other existing and reasonably foreseeable future activities described in Appendix E (Planned Activities Scenario) without the Proposed Action serves as the baseline for the evaluation of cumulative impacts of all alternatives.” A true No Action Alternative would contain only existing permitted projects- Vineyard Wind 1 and South</p>	<p>The no action and cumulative analysis are not the same. The no action is only looking at permitted projects as the baseline, while the cumulative impact analysis looks at the possibility of all offshore wind farms becoming permitted. Sections 1.6 and 2.1.1 discuss the how the cumulative impacts and the No Action Alternative are analyzed.</p>

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	<p>Fork Wind Farm- in its analysis. A Cumulative Impacts Alternative would detail all the planned and future foreseeable BOEM actions such as those potential future projects detailed in Appendix E. By equating the two, BOEM serves to downgrade the impacts produced by the proposed Project of Sunrise Wind. This is a corruption of NEPA and must be rewritten and all alternatives re-analyzed, with standalone No Action and Cumulative Impacts Alternatives.</p>	
<p>BOEM-2022-0071-0229-0005</p>	<p>Additionally, rather than comply with its OSCLA duties which state that the Secretary “shall ensure”, among other things, “prevention of interference with reasonable uses” when conducting all manner of offshore wind leasing, BOEM has instead substituted “promoting ocean co-use” as its own requirement. This is not the same. “Promoting ocean co-use” is not the same as “shall ensure prevention of interference with reasonable uses.” BOEM has taken a simple construct of the English language and changed it to something entirely different. BOEM does not get to dictate its own scope of authority or change the parameters of its own authority; only Congress can do that. As such, BOEM’s assumptions in the Purpose and Need section of the DEIS is faulty at its core, and therefore all resulting analysis is faulty.</p>	<p>BOEM intends to comply with its authority under the OCSLA. BOEM’s decision will be made after weighing the factors in subsection 8(p)(4) of the OCSLA, which include protection of the environment, conservation of the natural resources of the OCS, and consideration of other uses of the sea or seabed.</p>
<p>BOEM-2022-0071-0229-0006</p>	<p>BOEM states that it will make its determination on the proposed Project “after weighing the factors in subsection 8(p)(4) of OSCLA that are applicable to</p>	<p>Section 8(p) of the OCSLA, its implementing regulations, and Lease OCS-A 0487 require BOEM to analyze Sunrise Wind’s proposal to build a commercial-scale wind energy facility on Renewable</p>

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	<p>plan decisions and in consideration of the above goals”. OSCLA says nothing about weighing. It says “shall ensure” the factors listed, not in consideration of the developers or state’s goals or contractual “obligations”, but in the absolute. BOEM shall ensure prevention of interference with reasonable uses. BOEM shall ensure safety. All these obligations that BOEM “shall ensure” are applicable to the plan decisions. That is the point. BOEM does not get to decide which ones are and which ones aren’t. The law is supposed to constrain and set parameters on BOEM decision making, giving it limited and not unlimited authority. This is the entire idea of the law. BOEM has the authority to lease for offshore wind, subject to constraints. These legal constraints override Executive Order policy statements, developer contract “obligations” and full buildout goals, and state energy goals.</p> <p>However, it is clear from the Alternatives Considered but Not Analyzed that BOEM constrained its NEPA review and OSCLA compliance based on developer goals of full buildout of 1,034 MW, as well as the actual contract that the developer signed with NYSERDA, rather than fulfilling its OSCLA duties that the law mandates it “shall ensure.” It places erosion of developer profits above OSCLA duties. This is a problem and should be investigated as a form of regulatory capture. We discuss this below.</p>	<p>Energy Lease Number OCS-A 0487. BOEM will either approve, disapprove, or approve it with modifications. The EIS's purpose and need reflect the requirements of those regulations. Any changes to BOEM's renewable energy program are outside the scope of this environmental review and will be analyzed through a separate process.</p> <p>BOEM’s purpose and need, as stated in Section 1.2, is to determine whether to approve, approve with modifications or disapprove Sunrise Wind’s COP, is needed to fulfill BOEM’s duties under the lease. BOEM considered reasonable alternatives during the EIS development process to avoid or minimize adverse impacts in accordance with NEPA implementing regulations.</p> <p>Offshore wind projects rely on offtake agreements to obtain upfront financing for the capital costs of constructing a project. Without its existing offtake agreement, Sunrise Wind would not construct its proposed Project, or any of the action alternatives described in the Draft EIS. BOEM finds that the unique position of offtake agreements necessitates more deference than a typical contract between two private for-profit entities. An alternative that fails to meet the main goal of the Applicant would be equivalent to analyzing a No Action Alternative. Therefore, BOEM considers it appropriate under NEPA to analyze alternatives that would allow lessees to meet the obligations under their offtake agreements. Alternative C-3 has been added which looks at the lower and upper ranges of the NYSERDA agreement (880 MW, 924 MW, and 957 MW).</p>



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BOEM-2022-0071-0229-0007	<p>Alternatives Considered but Not Analyzed: The rejection of 4 nm wide transit lanes discussed on page 2-38 of the DEIS focuses on the fact that, “Adding transit corridors could erode Project economics and logistics and potentially lead the lessee to retract from the [Northeast leaseholders 1x1 nm turbine spacing] agreement, to which it committed to assuming that no additional transit lanes would be required”. First of all, the developer was part of multiple public transit lane workshops held by RODA prior to secretly releasing their “Northeast leaseholder agreement” in contradiction of the work accomplished at those workshops, which included multiple transit lanes that would have minimally disrupted the Sunrise Wind project. The BOEM rationale for rejecting consideration of this transit lane Alternative, of which radar interference concerns were a driving force, additionally rests on the conclusions of the USCG MARIPARS, which did not evaluate radar interference but erroneously alluded that it did not occur. Since the completion of that document, the National Academes of Science released a report, sponsored by BOEM, that confirms the very real presence of radar interference as a result of offshore wind turbines, with no immediate solutions. That report quotes part of our comments on the MARIPARS, which were ignored and which we have attached along with this comment. These comments also detail the reasoning for the request</p>	<p>As cooperating agencies, BOEM and the USCG have consulted over the course of the NEPA process for the proposed Project as it relates to navigational safety and other aspects. The Final Massachusetts and Rhode Island Port Access Route Study (MARIPARS) evaluated vessel traffic through the lease areas. They recommended all surface structures be aligned in a 1 by 1 nautical mile grid, such that vessels anywhere in the RI and MA lease areas would pass 1 WTG on either side every 1 nautical mile when traveling north-south or east-west. The mere presence of other proposed lanes will likely create conflicting-use scenarios. In response to concerns of increased navigational safety risks due to all transiting traffic being funneled into a navigational safety corridor, the USCG stated that “the standard and uniform [1-nautical-mile] grid pattern... should alleviate... concerns [with compression and funneling traffic through relatively narrow lanes] by providing vessels with sufficient spacing and multiple options to transit safely through the array.” If the entire MA/RI WEA is developed consistently with such a grid pattern, mariners could choose among the many resulting navigation safety corridors to safely navigate through the entire MA/RI WEA.</p>

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	<p>of transit lanes as specifically being concerns over radar interference. As a major issue that has gone unaddressed by both the USCG and BOEM, particularly as it pertains to BOEM’s requirement that any and all offshore wind leasing activity “shall ensure....safety”, BOEM cannot continue to brush this issue aside or use the MARIPARS as a full evaluation of safety in navigation through the lease area. We discuss this further later in our comments.</p>	
<p>BOEM-2022-0071-0229-0008</p>	<p>Another Alternative Considered but Not Analyzed is the Alternative to consider a closed loop cooling system for the OCS-DC. As evidenced in our comments below, we have significant concerns surrounding the OCS-DC open cooling water intake system. BOEM’s stated reasons for rejecting any analysis for this option, which would significantly reduce the adverse environmental impacts associated with the proposed Project, is that a closed loop system would be “less energy efficient”, cause “significant increases in capital expenditures (CAPEX) and operational expenditures (OPEX).” This is not our problem. This is not BOEM’s problem. Analyzing a reasonable range of Alternatives per NEPA is BOEM’s problem, not attempting to make the cheapest possible options available to the developer at the expense of the environment. Sunrise Wind is the only project and only developer so far to even propose such an impactful and harmful system. This means that it is unnecessary and is simply a desired design feature on the part of</p>	<p>BOEM’s <i>Process for Identifying Alternatives for Environmental Reviews of Offshore Wind Construction and Operations Plans, pursuant to NEPA</i>, published June 22, 2022, is available at this link: <a href="https://www.boem.gov/sites/default/files/documents/renewable-energy/BOEM%20COP%20EIS%20Alternatives-2022-06-22.pdf">https://www.boem.gov/sites/default/files/documents/renewable-energy/BOEM%20COP%20EIS%20Alternatives-2022-06-22.pdf</a>. Screening criteria listed in the document linked above allow for BOEM to dismiss an alternative from further analysis if it is “technically infeasible or impractical, meaning implementation of the alternative is unlikely given past and current practice, technology (e.g., experimental turbine design or foundation type), and/or site conditions (e.g., presence of boulders) as determined and documented by BOEM’s technical experts.” As indicated in Table 2.2-1 of the Draft EIS, there are no commercially available alternative cooling technologies for use in the offshore marine environment that could be considered an alternative to the Applicant's Proposed Action.</p>

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	<p>the developer.                      However, BOEM’s conclusion is that “For these reasons, consideration of a closed loop cooling system is not technically and economically feasible or practical.” Yet BOEM offers no rationale for this statement. If other developers do not need such systems, why would Sunrise Wind? Why would using the same types of systems as other approved projects make Sunrise Wind’s proposed Project technically and economically feasible and practical? Where is any analysis to this effect? Who decides what is feasible? Does BOEM conduct any independent consideration of “feasible”? Or does BOEM simply take a developer’s statement that it is feasible or unfeasible as its Alternatives analysis? We request that BOEM define its process for determining “feasible” and “practical” for any part of a project, any independent analysis conducted to determine feasibility and/or practicability and how BOEM weighs any such analysis vs potential environmental impacts, including any thresholds utilized, in making “feasibility” or “practicality” determinations. However, the very disturbing trend in BOEM’s analysis is the reliance on economics of the developer. BOEM says that considering any Alternative analysis of a 4 nm wide transit lane, which would be in compliance with a mandatory OSCLA legal requirement to provide for safety, “could erode Project economics” and therefore discontinues the discussion. BOEM states that any</p>	

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	<p>alternative to the proposed Project’s open cooling water intake system would be “not..economically feasible or practical”. The Sunrise Wind project is already unfeasible economically. Orsted has already calculated a 2.5 billion DKK impairment loss on the Sunrise Wind project and before it is even built is discussing future divestment.</p>	
<p>BOEM-2022-0071-0229-0009</p>	<p>BOEM can’t base its decision on swings in economics; it has to base its decisions on fulfilling its legal requirements. Many projects are already defaulting on power purchase agreements- another reason that BOEM cannot continue using these PPAs as rationale for not disapproving projects or parts of projects or refusing to consider various Alternatives. Commonwealth Wind has already appealed for a renegotiation of its power purchase agreement with the state of Massachusetts because the proposed project is now uneconomical and unfinanceable. Ocean Wind off the coast of New Jersey, planned by the same developer as Sunrise Wind, has now become so economically unfeasible that PSEG has pulled out of its 25% stake in the project after only 2 years of its initial investment, as its CEO states, “what you have been seeing with others, we are seeing with our projects”. Currently, offshore wind projects are failing economically before even being built or reviewed by BOEM. BOEM cannot therefore rely on “economic feasibility” as a decision point for rejection of Alternatives unless it is also prepared to</p>	<p>BOEM’s regulations require BOEM to analyze Sunrise Wind’s proposal to build a commercial-scale wind energy facility on the Renewable Energy Lease Number OCS-A 0487. The purpose and need in the EIS reflect the requirement per those regulations, whereas BOEM’s purpose, as stated in Section 1.2—to determine whether to approve, approve with modifications, or disapprove Sunrise Wind’s COP—is needed to fulfill BOEM’s duties under the lease. BOEM considered reasonable alternatives during the EIS development process that would avoid or minimize adverse impacts in accordance with NEPA implementing regulations. Under the NEPA regulations at 40 CFR1508.1(z), “reasonable alternatives means a reasonable range of alternatives that are technically and economically feasible, and meet the purpose and need for the proposed action.” In the case of Sunrise Wind, an alternative that cannot meet the requirements of the offtake agreement that was awarded on a competitive basis would be economically infeasible. Offshore wind projects rely on offtake agreements to obtain upfront financing for the capital costs of constructing the Project. Without its existing offtake agreement, Sunrise Wind would not be able to construct its proposed Project or any of the action alternatives described in the Draft EIS.</p>

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	<p>reject the entire proposed Project for the same reasons. Basing decisions on contracts/agreements/developer goals even if they were feasible is inappropriate, since if BOEM binds itself to those contracts it essentially gives the developers and PPA companies the exclusive right to dictate BOEM NEPA review. This is precisely what has happened with the Sunrise Wind DEIS. We request that BOEM conduct full NEPA analysis of the various “Alternatives Considered for Analysis in this DEIS but not Analyzed” that were rejected due to purported lack of economic feasibility, and/or consider a full disapproval and rejection of the proposed Project due to economic infeasibility to be consistent with the current rationale for rejecting the Alternatives not Analyzed.</p>	
<p>BOEM-2022-0071-0232-0002</p>	<p>BOEM originally designated the lease area in 2012. No re-examination of the environmental cost, in light of emerging science, has subsequently occurred. The current lease, and all other leases for projects along the Atlantic coast, continue to rely on this out-dated environmental assessment from 2012. Acceptance of the leases’ validity allows the current DEIS to compare the current project to either a “no-action” alternative or to altered configurations within the given lease area. The reliance on comparing the project to a “no-action alternative” masks all potential environmental harm and renders the DEIS almost meaningless. BOEM needs to re-examine the safety and</p>	<p>The EIS uses updated data collected by the developer within their Lease Area as well as any other available data collected through agencies or stakeholders. Under the cumulative impact analysis, resources are analyzed based on their GAA and other proposed wind farm projects. Additionally, the baseline conditions include existing conditions in the ocean environment, as well as other wind farm projects that have either been built or approved for construction.</p>

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	appropriateness of the lease area in light of up-to-date scientific studies before proceeding.	
BOEM-2022-0071-0232-0005	Most glaringly, the DEIS fails to include interactions between multiple pressures in the cumulative impact assessment. A recent review of the literature stresses the significance of this gap in our knowledge (Galparsoro, 2022). BOEM needs to prepare a programmatic EIS to examine the entire wind development of the outer continental shelf, including all interactions. Individual stressors do not act in isolation and can have a negative synergistic effect that can accumulate and exponentially increase environmental damage. Given that BOEM plans to develop 22 million acres of the Outer Continental Shelf, an assessment that considers interactions seems particularly important. No further developments should occur until a cumulative impact assessment includes a complete programmatic review and a full assessment of interactions.	BOEM’s regulations require BOEM to analyze Sunrise Wind’s proposal to build a commercial-scale wind energy facility on the Renewable Energy Lease Number OCS-A 0487. The purpose and need in the EIS reflect the requirement per those regulations, whereas BOEM’s purpose, as stated in Section 1.2, is to determine whether to approve, approve with modifications, or disapprove Sunrise Wind’s COP, and to fulfill BOEM’s duties under the lease. As outlined in Section 1.4, this EIS tiers to and incorporates by reference a number of programmatic assessments on wind energy development in the New England region. In support of the NEPA process, BOEM also develops white papers to provide detailed discussions of topics raised. These papers are summarized and iteratively incorporated into BOEM's offshore renewable energy NEPA documents as available. Completed BOEM white papers are available under the White Papers tab on this page: <a href="https://www.boem.gov/renewable-energy/national-environmental-policy-act-and-offshore-renewable-energy">https://www.boem.gov/renewable-energy/national-environmental-policy-act-and-offshore-renewable-energy</a> .
BOEM-2022-0071-0232-0006	BOEM offers no evidence for its conclusions that the impacts on wildlife and the environment will be minor or moderate, nor does the DEIS adequately define direct, indirect, and cumulative impacts. The authors use language such as “small” and “large” without any further specifications. This does not constitute a meaningful definition or criteria for either a scientific understanding or for the public's general ability to appreciate the consequences. These vague descriptors leave the public will no	Definition of impact level is included in Section 3.3. Each resource is evaluated for potential impacts, and impact determinations/conclusions are presented in a summary table at the end of the resource section. Cumulative impacts are defined in Section 1.6 and are summarized in each resource section.

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	objective bounds within which to evaluate the potential impacts of the project.	
BOEM-2022-0071-0232-0008	BOEM must be transparent on how impacts are quantitatively or qualitatively assessed.	Impacts are discussed in Chapter 3 for each resource area and justified with data or references.
BOEM-2022-0071-0232-0010	Without a rigorous scientific model, poorly defined, imagined adverse impacts cannot justify known impacts. The entire DEIS justifies their adverse impacts based on broad, unproven anticipated future effects of climate change and increased development. Moreover, the most recent literature does not support the projections in planetary temperature used by the DEIS. The impact assessments are not reasonable, legal, or scientifically defensible.	Thank you for the comment. BOEM used the latest current scientific information in its analysis of the SRWF.
BOEM-2022-0071-0232-0036	In light of the above fatal errors, if BOEM were to approve such a legally deficient DEIS, it would undermine the fundamental tenants of our democracy. Thank you for your time and consideration. I very much appreciate the opportunity to detail my concerns and have them entered into the administrative record.	Thank you for expressing your concerns and providing helpful comments for the Sunrise Wind EIS.
BOEM-2022-0071-0242-0013	NEPA is the fundamental tool for ensuring a proper vetting of the impacts of major federal actions on wildlife, natural resources, and communities; for ensuring reasonable alternatives are considered and identifying the most environmentally preferable alternative; and for giving the public a say in federal actions that can have a profound	Thank you for your comment.

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	<p>impact on their lives and livelihoods. For a half-century, NEPA has ensured that federal agency decision-making is based on a thorough consideration of the environmental impacts of federal decisions. NEPA requires “efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man” and mandates that “to the fullest extent possible” the “policies, regulations, and public laws of the United States shall be interpreted and administered in accordance with [NEPA].”</p> <p>To comply with NEPA, an EIS must, inter alia, include a “full and fair discussion” of significant environmental impacts. The Council for Environmental Quality once again clarified that under NEPA, agencies must consider direct, indirect, and cumulative effects of major federal actions. Under 40 C.F.R. §1508.1(g)(3), “cumulative effects” has the following definition:</p> <p>Cumulative effects, which are effects on the environment that result from the incremental effects of the action when added to the effects of other past, present, and reasonably foreseeable actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative effects can result from individually minor but collectively significant actions taking place over a period of time.</p>	



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	<p>In addition to a thorough examination of direct and indirect impacts, as well as mitigation measures, assessing cumulative effects is essential to understanding the impact of offshore wind on species and ecosystems along the coast.</p> <p>Additionally, under NEPA, BOEM must make every attempt to obtain and disclose data necessary to its analysis in order to provide a “full and fair discussion of significant environmental impacts.” The simple assertion that no information or inadequate information exists will not suffice. Unless the costs of obtaining the information are exorbitant, NEPA requires that it be obtained. Agencies are further required to identify their methodologies, indicate when necessary information is incomplete or unavailable, acknowledge scientific disagreement and data gaps, and evaluate indeterminate adverse impacts based upon approaches or methods “generally accepted in the scientific community.” Such requirements become acutely important in cases where, as here, so much about an activity’s impacts depend on newly emerging science. As we expand upon later in this section, this duty also applies to the evaluation of reasonable alternatives. In particular, BOEM should provide an evaluation of the feasibility of various turbine technologies and foundations in the Final EIS. Finally, NEPA does not</p>	

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	<p>permit agencies to “ignore available information that undermines their environmental impact conclusions.”</p>	
<p>BOEM-2022-0071-0248-0001</p>	<p>The Responsible Offshore Development Alliance (RODA) submits the following comments regarding the Bureau of Ocean Energy Management (BOEM) Notice of Availability of a Draft Environmental Impact Statements (DEISs) for both Sunrise Wind, LLC’s (Sunrise) Proposed Wind Energy Farm Offshore New York1 and Coastal Virginia Offshore Wind (CVOW) Commercial Project. Due to the unrealistic time constraints, as more thoroughly discussed below, we address the two DEISs in the same document. We will specify when directing comments on a specific project. For example, we include a discussion on the Offshore Converter Station proposed in the Sunrise DEIS.</p>	<p>We value your input and apologize for the difficult timing constraints.</p>
<p>BOEM-2022-0071-0248-0003</p>	<p>It is unrealistic for BOEM, or any Agency for that matter, to inundate interested stakeholders and the public with public comment opportunities that seem designed to overwhelm and overburden those who the Agency’s serve. The EPA’s National Environmental Policy Act (NEPA) describes public participation, including subsection (a)(5) which highlights the need to “ensure meaningful public participation throughout the NEPA process.” We question how meaningful input is possible given that BOEM currently has three DEISs in the Atlantic which have public comment deadlines between February 14th and February 21st.</p>	<p>We value your input and apologize for the difficult timing constraints.</p>

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BOEM-2022-0071-0248-0004	<p>This is in addition to other Agency activities, including BOEM, that stakeholders are currently following. Stakeholder fatigue is real and will surely impact the specificity, quality and detail of responses to these comment opportunities. This is particularly concerning for actions, like those covered in the DEISs, proposing to bring large-scale developments to our nation’s oceans. There remain a significant number of unknown impacts which may be linked to these large-scale developments. For example, potential impacts to the Mid-Atlantic Cold Pool, primary production, larval dispersal, impacts of electromagnetic fields on marine life, protected resources (especially the endangered North Atlantic right whale), impacts of pile driving, changes in cost of electricity, impacts of onshore cables, costs and resources associated with upgrading current grid infrastructure needed to accommodate this energy source, and the true number of well-paying, permanent jobs. This list is not exhaustive and we refer you to the comment letter submitted by Seafreeze, Ltd for additional concerns. Additionally, for some identifiable impacts, there remains serious concerns about the scale and severity of those impacts. RODA and others have long called for a Programmatic Environmental Impact Statement (PEIS) with an adaptive management approach. Today we are reiterating that recommendation with the additional reason of ensuring the required</p>	<p>Regulations require BOEM to analyze Sunrise Wind’s proposal to build a commercial-scale wind energy facility on the Renewable Energy Lease Number OCS-A 0487. The purpose and need in the EIS reflect the requirements per those regulations, whereas BOEM’s purpose, as stated in Section 1.2, is to determine whether to approve, approve with modifications, or disapprove Sunrise Wind’s COP, to fulfill BOEM’s duties under the lease. As outlined in Section 1.4, this EIS refers to and incorporates by reference a number of programmatic assessments on wind energy development in the New England region. In support of the NEPA process, BOEM also develops white papers to provide detailed discussions of topics raised. These papers are summarized and iteratively incorporated into BOEM's offshore renewable energy NEPA documents as available. Completed BOEM white papers are available under the White Papers tab here: <a href="https://www.boem.gov/renewable-energy/national-environmental-policy-act-and-offshore-renewable-energy">https://www.boem.gov/renewable-energy/national-environmental-policy-act-and-offshore-renewable-energy</a>.</p>

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	<p>meaningful public participation. RODA and its members have submitted hundreds of comment letters to BOEM and its cooperating federal and state agencies outlining significant concerns associated with offshore wind energy (OSW) development on the Atlantic OCS, where these projects are proposed, and other areas that are essential to U.S. seafood production and U.S. food security. Unfortunately, BOEM continues to conduct environmental review using a piecemeal, rather than regional, approach.</p>	
<p>BOEM-2022-0071-0248-0005</p>	<p>Regulations implementing NEPA define Effects or Impacts as follows, “changes to the human environment from the proposed action or alternatives that are reasonably foreseeable and include the following:                      Cumulative effects, which are effects on the environment that result from the incremental effects of the action when added to the effects of other past, present, and reasonably foreseeable actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative effects can result from individually minor but collectively significant actions taking place over a period of time.”While the DEISs do provide content related to cumulative impacts of ongoing and planned activities, they fail to take a holistic view of the potential impacts from large-scale buildout of offshore wind developments on the Atlantic OCS. RODA, other fishing industry</p>	<p>The No Action Alternative assumes that the Sunrise Wind Project will not be built, but other offshore wind projects that have already been permitted for construction, or already constructed, as the baseline. This No Action Alternative is reasonable since these projects are permitted to be built and therefore will be the baseline conditions of the surrounding environment. The cumulative impact analysis looks at the possibility of all offshore wind farms becoming permitted to analyze the full impact of all offshore wind farms being constructed. Sections 1.6 and 2.1.1 discuss the how the cumulative impacts and the No Action Alternative are analyzed.</p>

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	<p>representatives, marine scientists, fishery management councils, the environmental community, and others have consistently requested BOEM take a cumulative approach to offshore wind planning and leasing. BOEM is doing the public and the environment a disservice by continuing to review individual projects in isolation despite the large number of projects it is “fast tracking” and the existing OSW energy production targets. It is difficult to imagine that it would not also benefit developers, transmission interests, and the public for BOEM to clarify its approach to cumulative effects review and at a minimum implement regional planning processes as robust as those it employs for oil and gas leasing.</p>	
<p>BOEM-2022-0071-0248-0007</p>	<p>The Supplemental Environmental Impact Statement (SEIS) completed in 2020 for the Vineyard Wind I project was intended to serve as a cumulative impacts analysis for multiple projects in the region. However, the SEIS was only incorporated into the record of that project as BOEM used an entirely different—and grossly insufficient—approach for the South Fork project just weeks later. It is unclear what, if any, approach BOEM plans to use going forward, although the new leadership at Department of Interior has made clear that they disapprove of any of the environmental review practices of the last Administration so these are likely to change. Politics must not interfere with scientific integrity or transparency and we request</p>	<p>Sections 1.6 and 2.1.1 discuss how the cumulative impacts and the No Action Alternative are analyzed.</p>

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	<p>BOEM clarify what document the public should review to understand the cumulative impacts of potentially 3,000 turbines whose installation it is “streamlining” into the seabed between MA and VA alone. We further request BOEM to provide explicit information as to how it will approach cumulative impacts reviews for this and future projects.</p>	
<p>BOEM-2022-0071-0248-0008</p>	<p>BOEM, as the agency hiring consultants to draft Environmental Impact Statements for offshore wind projects, has implemented an inadequate cumulative impacts strategy. It is unclear how BOEM decides which projects are included in an EIS. For the earliest projects (Vineyard Wind 1, South Fork, and Ocean Wind 1) BOEM’s NEPA review focused on a single proposed project with a Power Purchase Agreement (PPA) in place. For CVOW, the EIS will be prepared without the project having a PPA. The CVOW DEIS describes the purpose of the proposed actin as “to respond to Dominion Energy’s COP proposal.” This is based, in part, “on the goals of Dominion Energy, BOEM’s authority, and Executive Order 14008.” “Dominion Energy’s Dominion Energy’s goal is to develop a commercial-scale offshore wind energy facility in the Lease Area; to provide between 2,500 and 3,000 megawatts (MW) of energy, making landfall in Virginia Beach, Virginia; and to use the offshore wind power generated from the proposed Project to supply its own customers.” In summation, there appears to be no standard protocol for when BOEM</p>	<p>BOEM does not hire consultants directly. Throughout each EIS, BOEM strives to improve analysis through lessons learned and input from public, stakeholders, and consulting parties.</p>

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	<p>will conduct a project’s EIS, and inconsistency is increased when analyses are conducted piecemeal for each phase versus across an entire lease area or geographic region. As the PPAs have, in the past, determined BOEM’s range of alternatives and what fisheries mitigation measures can be considered within the project parameters, this leads to significant uncertainty regarding how BOEM will conduct the upcoming NEPA reviews. Moreover, the current approach makes it nearly impossible to conduct any cumulative analysis as there is no appropriate time in the federal process to do so.</p>	
<p>BOEM-2022-0071-0248-0009</p>	<p>Additionally, since the Notice of Intents to prepare these DEISs,15 BOEM has taken action on many other relevant activities in the region. There have been multiple DEISs, a regional USCG Port Access Route Study, an auction for six additional leases in the New York Bight, publication of several more Draft WEAs (Central Atlantic WEAs), and identification of Draft Call Areas in the Gulf of Maine. Both DEISs include an Appendix entitled Planned Activities Scenario. Each of these estimate the total number of operational turbines in the Atlantic OCS to be 3,101 by 2029. This does not include areas which have been identified for potential development (Central Atlantic and Gulf of Maine) which could increase that number significantly. Yet, BOEM has not sufficiently evaluated the cumulative impacts of prospective activity in the region. This must be remedied</p>	<p>Cumulative impacts have been analyzed within this Final EIS. Section 1.6 discusses how the cumulative impacts and the No Action Alternative are analyzed.</p>

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	immediately and should be incorporated into all future analyses conducted by BOEM.	
BOEM-2022-0071-0248-0010	RODA strongly urges BOEM to reconsider the sequencing of the site assessment, COP approval, and NEPA initiation for OSW projects, as the current rushed timeline has resulted in Proposed Alternatives that may not be possible given technical constraints. If the site assessment is fully complete prior to the COP approval and initiation of the NEPA analyses, the Proposed Action would be better informed. A compression of these different analyses and permitting actions means the public is not adequately informed of the expected project design and again demonstrates why alternatives should be fully analyzed and compared against each other - not solely to the Proposed Action. We strongly urge BOEM to require geological information, which may drastically change a project design in light of fisheries impacts, be more readily available early on in the process. A rushed process does equal a better process.	Thank you for your comment.
BOEM-2022-0071-0248-0011	In the DEISs, the No Action Alternative assumes only the Proposed Action will not occur. “[A]ll other past and ongoing impact-producing activities would continue.” This assumes full buildout of existing and foreseeable future activities - including other energy developments - without also providing information or comparison of alternatives against an undeveloped (no construction) region. As presented, the DEISs presuppose the approval of	The No Action Alternative assumes that the Sunrise Wind Project will not be built, but other offshore wind projects that have already been permitted for construction, or already constructed, as the baseline. This No Action Alternative is reasonable since these projects are permitted to be built and therefore will be the baseline conditions of the surrounding environment. The cumulative impact analysis looks at the possibility of all offshore wind farms becoming permitted to analyze the full impact of all offshore wind farms being constructed. Sections 1.6 and 2.1.1



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	<p>future OSW projects that have not even begun an environmental assessment, nor have the public had the opportunity to provide input to. This results in multiple issues:</p> <ul style="list-style-type: none"> <li>• The DEIS provides the public with misleading information as it presumes construction of OSW in all the leases in the region. Project approval must not be expected preemptively.</li> <li>• The public cannot reasonably differentiate and assess if a specific project and regional OSW development are worth the impacts they will cause; both known and unknown.</li> <li>• The impacts of these projects are diluted and obscured as they are only compared against regional buildout rather than no development.</li> <li>• Contribution of each project to cumulative impacts is minimized. One project may not seem “that bad” in comparison to the potential buildout of all leases and WEAs in the region, but the cumulative impacts of all these projects will be the most harmful to the marine environment and ocean users. At a minimum, an additional alternative should be analyzed and compared against the design envelope of the project for which the DEIS has been</li> </ul>	<p>discuss how the cumulative impacts and the No Action Alternative are analyzed.</p>

Comment No.	Comment	Response
	<p>prepared: a No Development Alternative. The No Action Alternative as presented should still be included in the DEISs but a complimentary No Development Alternative should be provided to the public also. Again, this demonstrates the need for a robust cumulative impact assessment and mitigation measures aimed to address cumulative impacts to understand the true impacts of OSW in the Atlantic.</p>	
<p>BOEM-2022-0071-0248-0013</p>	<p>Since the scoping period for these DEISs, BOEM issued a new policy that has the effect of excluding alternatives from environmental review that would in fact reduce or mitigate fisheries impacts. The “Process for Identifying Alternatives for Environmental Reviews of Offshore Wind Construction and Operations Plans pursuant to the NEPA” released in June 2022 standardizes the alternatives BOEM will consider during the NEPA process and clarifies BOEM’s policy of considering only a narrow range of alternatives consistent with a developer’s preferred project plans. Indeed, it affords the terms of cost-competitive procurement agreements “more deference than a typical contract between two private for-profit entities,” although such contracts are nearly entirely driven by profit and energy maximization and without environmental review. The document only references mitigation in the context of what should</p>	<p>Thank you for your comment. BOEM’s regulations require BOEM to analyze Sunrise Wind’s proposal to build a commercial-scale wind energy facility on the Renewable Energy Lease Number OCS-A 0487. The purpose and need of the EIS reflect the requirements per those regulations. BOEM’s purpose as stated in Section 1.2 is to determine whether to approve, approve with modifications, or disapprove Sunrise Wind’s COP, which is needed to fulfill BOEM’s duties under the lease. As part of the NEPA process, alternatives were considered and screened if it was outside the jurisdiction of the lead agency. Mitigation and monitoring measures identified for consideration in the EIS and Record of Decision are summarized at the end of each resource area. Appendix H, <i>Mitigation and Monitoring</i> further describes the EPMs committed to by the developer in the COP, and additional mitigation and monitoring measures being considered by BOEM.</p>

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	<p>not be considered as a NEPA alternative; that is, it suggests actions with “substantially similar effects” to other options should be considered outside of the range of alternatives. We urge BOEM to reconsider this policy. Specifically, for these projects and all other proposed OSW projects, the agency should include alternatives for analysis in each of its environmental review documents describing specific fisheries mitigation solutions and afford these full, neutral consideration. Stand-alone alternatives will more clearly inform public comment and allow better evaluation of potential mutual benefits or tradeoffs. As a public agency, BOEM’s consideration of alternatives should include those that reasonably mitigate impacts to fishing and businesses dependent upon fishing, whether or not a developer has voluntarily proposed to incorporate them in its Construction and Operations Plan (COP) and whether or not they could require reasonable modifications to private contracts.</p>	
<p>BOEM-2022-0071-0248-0014</p>	<p>It is imperative the public is able to differentiate impacts from the various alternatives presented in the DEISs to understand the suitability of prospective project alternatives. The DEISs analyze the impacts of multiple grouped alternatives primarily as modifications to the Proposed Action, rather than against each other. Using fisheries as an example, the DEISs present Impacts Analysis for Commercial and For-Hire Recreational</p>	<p>The Draft EIS did not determine a "likely alternative" and each alternative was analyzed separately. Each alternative is compared against the baseline environment. Alternative C is a habitat minimization alternative and removed WTG from certain areas. Changes in the WTG configuration would not change impacts for some resource areas or would only slightly change impacts when compared to the Proposed Action. This is because all other actions within the Proposed Action would occur under these alternatives, except for WTG locations. By referring to the Proposed action</p>

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	<p>Fisheries for each of the Alternatives together. That each DEIS acknowledges major adverse impacts on commercial fisheries is much appreciated.<sup>21</sup> It is unclear in the documents how impacts from the various alternatives differ from each other. Instead, the impact analysis compares the collective back to the Proposed Action, which the DEISs assume would be the most likely “Alternative”. From discussions with leaseholders in other project areas, it is our understanding that technical constraints may be realized after DEIS completion that make the Proposed Actions unfeasible. Yet, it is still the project design that all other alternatives are compared against.</p>	<p>analysis and only highlighting differences under Alternative C, it keeps the document concise and reduces redundant information.</p>
<p>BOEM-2022-0071-0248-0018</p>	<p>Confusion is further compounded as the different alternatives can be combined for the Final EIS. The alternatives listed in each DEIS are not mutually exclusive. BOEM may “mix and match” multiple listed Draft EIS alternatives to result in a preferred alternative that will be identified in the Final EIS provided that: (1) the design parameters are compatible; and (2) and the preferred alternative still meets the purpose and need.” This is concerning in the sense that the public cannot effectively understand what is the preferred alternative. It is setting up an opportunity for a bait-and-switch when the preferred alternative will not be revealed until the publication of the Final EIS. Principles of transparency and informed decision-making should never be undermined and the public</p>	<p>BOEM’s identification of the Preferred Alternative is informed in part through consideration of public comments on the Draft EIS. Mitigation recommended for inclusion in the Preferred Alternative is informed by consultations that were ongoing at the time of Draft EIS publication. Identification of the Preferred Alternative in the Final EIS supports consideration of public comments on the Draft EIS and incorporates the results of the consultations.</p>

Comment No.	Comment	Response
	should be fully informed throughout the process.	
BOEM-2022-0071-0248-0045	<p>Concluding recommendations: We recommend BOEM release for public comment a Supplemental Environmental Impact Statement (SEIS) that addresses concerns raised in this letter and by other commenters. We recommend this SEIS not be published until: Data gaps and concerns above are addressed Completion of BOEM funded study examining movement patterns of Atlantic cod, black sea bass, and other fish stocks in southern New England region; and The July, 2022 Habitat Area of Particular Concern proposed by the New England Fishery Management Council is finalized Note, this list is not exhaustive.</p>	Thank you for your comment. The Final EIS will be moved forward when all agency and public comments have been reviewed and addressed. A Supplemental EIS is not considered necessary.
BOEM-2022-0071-0249-0009	<p>Moreover, the DEIS fails to incorporate best practices and minimum guidelines that would apply to all offshore wind developments near the City of Newport and Town of New Shoreham. In specifically requiring cumulative impacts analyses, NEPA recognizes the significant effect that reasonably foreseeable projects can have on the surrounding landscape beyond the scope of a single development. BOEM’s analysis and methodology for assessing cumulative impacts in the DEIS are confusing and unclear. Consulting parties and the public have a right to understand BOEM’s conclusions and how it arrived at them. Currently, no reasonable person can interpret them.</p>	Apologies for the confusion on the cumulative impacts analysis. Sections 1.6 and 2.1.1 discuss how the cumulative impacts and the No Action Alternative are analyzed.

Comment No.	Comment	Response
BOEM-2022-0071-0249-0035	BOEM has the duty to assess adverse effects; the NHPA does not place the duty on consulting parties to extrapolate, guess, or fill in the blanks. Without a comprehensive understanding of adverse effects on NHLs, BOEM cannot possibly demonstrate all possible planning to minimize harm because the full extent of Sunrise Wind’s adverse effects is unknown	The EIS document provides a detailed description of the impacts of the Project. The EIS Introduction, Sections 1.5 and 1.6, provides the methodology for assessing the environmental impacts used for this federal action in accordance with NEPA requirements and other regulatory frameworks. Chapter 2 of the EIS provides information on how alternatives were scoped, including scoping meetings for public involvement. Chapter 3 of the EIS identifies the affected environment, including as it relates to cultural resources and historic properties, provides the basis for IPFs for affected resources, and analyzes impacts. BOEM is addressing all of the regulatory requirements of the NHPA Section 106 process, including NEPA substitution, as it proceeds through the NEPA analyses. BOEM informed the public and all NHPA Section 106 consulting parties that would use the NEPA process to substitute for the steps in the Section 106 process when it released the NOI for the Project. BOEM has engaged in, currently engages in, and will continue to consult with Tribal Nations, SHPOs, Advisory Council on Historic Preservation, and consulting parties involved in historic preservation within the development areas. Consultation has included and will continue to include cultural resource identification, assessment of effects, and resolution of adverse effects on historic properties.
BOEM-2022-0071-0249-0037	BOEM HAS INAPPROPRIATELY CLASSIFIED DOCUMENTS AS CONFIDENTIAL AND FRUSTRATED PUBLIC SCRUTINY.	The EIS and its appendices are all publicly available, when appropriate. Documents contained within the COP contain sensitive and confidential material, which is up to the developer to publicly release.
BOEM-2022-0071-0249-0038	Section 304 of the NHPA protects certain sensitive information about historic properties from disclosure to the public when such disclosure could result in a significant invasion of privacy, damage to	Thank you for your comment, sensitive material was not disclosed to the public.

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	the historic property, or impede the use of a traditional religious site by practitioners.	
BOEM-2022-0071-0249-0042	<p>As the above list demonstrates—and which comprises the most important aspects of environmental permitting review—BOEM has conducted its NEPA and NHPA under a cloud of secrecy, which is the opposite of how Congress intended these laws to operate. Therefore, we request that BOEM immediately make all technical reports public unless a legitimate reason exists for confidentiality and only after NPS and ACHP review. Congress passed NEPA and the NHPA to help ensure that the public could understand the effects of government undertakings on the natural, cultural, and historic environment. Section 304 of the NHPA allows sensitive information to be redacted but does not allow blanket and indiscriminate non-disclosure. Keeping Sunrise Wind reports confidential undermines this public intent, especially where it does not appear that BOEM has any legitimate justification for keeping the reports confidential and exempt from the Freedom of Information Act or FOIA.</p>	<p>BOEM has consulted with the Advisory Council on Historic Preservation and coordinated with the NPS about a plan on how to handle sensitive information potentially subject to Section 304 of the NHPA. BOEM has not yet formally initiated the Section 304 consultation pursuant to 36 <i>CFR</i> 800.11(c) for the Section 106 consultation on the Project. The NPS has informed us that the Section 304 regulations of the NHPA do not specify when or if an agency is required to initiate consultation with the Secretary of the Interior within the course of an ongoing Section 106 consultation. In addition, the NPS advised BOEM that it is acceptable for a federal agency to wait to disclose Project findings to the public until identification of historic properties, including sites of religious and cultural significance to tribes, and potential effects to these properties have concluded and consensus evaluations of NRHP eligibility have been completed. From the beginning of the Section 106 consultation for the Project, BOEM has planned to distribute the reports that contain sensitive information to the consulting parties and to post publicly available summaries or redacted versions of Section 106– related documents to BOEM's website. The consulting parties have received all the available information and documentation associated with this Section 106 consultation, including sensitive information that could be subject to Section 304. The basis for making all of the revised technical reports confidential (reports associated with the preparation of the Draft EIS) as opposed to redacting sensitive portions and making the documents public is as follows: the documents could contain sensitive information that could be subject to Section 304 of the NHPA.</p>

Comment No.	Comment	Response
BOEM-2022-0071-0249-0044	<p>In conclusion, BOEM must revise the DEIS and associated reports for the reasons explained above. BOEM must also declassify and make publicly available all documents that BOEM has inappropriately withheld from public review and restart the NEPA and NHPA process so that consulting parties and the public can consult meaningfully with BOEM to resolve Sunrise Wind’s adverse effects.</p>	<p>The EIS and its appendices are publicly available. Some documents within the COP contain sensitive and confidential material, and it is up to the developer to publicly release them. The sensitive information on historic properties that was either summarized in publicly available documents or redacted from public documents is information that relates to the ownership, character, and location of historic properties that are not necessarily of public record, particularly archaeological sites and sites of traditional religious and cultural significance to Tribal Nations. While BOEM shared complete, unredacted versions of all documentation with consulting parties for their review, BOEM did not provide full versions of all Section-106-related documentation to the general public. However, BOEM did make public summaries or redacted versions of all such documentation to facilitate public involvement in the Section 106 process and comment on the Draft EIS.</p>
BOEM-2022-0071-0251-0002	<p>First and foremost, we do not believe that comment periods offered by BOEM for any of the various offshore wind lease areas has given the commercial fishing industry adequate time to keep up with BOEM’s new “fast and furious” approach to mainline the offshore leasing and approval process and prepare and comment. It does appear through scheduling multiple comment due dates within days of each other that BOEM is trying to overwhelm our industry and our stakeholders, which in New York is comprised almost solely of small-family businesses. Due to the breadth of reading material for each lease area, we believe BOEM should allow for a full ninety days from a draft EIS release to the comment period due, and</p>	<p>Thank you for your comments and for taking the time to review the EIS. We understand the schedule was difficult but BOEM's intention was not to overwhelm stakeholders or the industry. The comment period is legally required to be 45 days long, the SRWF EIS comment period was extended to 60 days to allow more time for the public and stakeholders to review and provide comments. While the overlapping comment periods was unfortunate, not allowing overlap would have consequences for the EIS schedules as they are only supposed to take 2 years from the date of the Notice of Intent.</p>



Comment No.	Comment	Response
	specifically start a 90-day clock, so that no other BOEM comment period could be scheduled until the 90-day clock is over, meaning zero overlap between comment periods.	

**O.6.25. Other Topics**

**Table O-33. Responses to Comments on Other Topics**

Comment No.	Comment	Response
BOEM-2022-0071-0249-0041	<p>BOEM has either labeled the following documents as “confidential” or redacted them in the Construction and Operations Plan:</p> <ul style="list-style-type: none"> <li>• Appendix D – Certified Verification Agent</li> <li>• Appendix E1 – Emergency Response Plan/Oil Spill Response Plan</li> <li>• Appendix E2 – Safety Management System</li> <li>• Appendix F – Conceptual Project Engineering Design Drawings/Additional Project Information</li> <li>• Appendix G1 – Marine Site Investigation Report</li> <li>• Appendix G2 – Munitions and Explosives of Concern (MEC) and Unexploded Ordnance (UXO) Risk Assessment with Risk Mitigation Strategy</li> <li>• Appendix G3 – Foundation Feasibility Assessment</li> <li>• Appendix G4 – Cable Burial Feasibility Assessment</li> <li>• Appendix K – Air Quality Emissions Calculations and Methodology</li> <li>• Appendix R – Marine Archaeological Resources Assessment</li> <li>• Appendix S1 – Terrestrial Archaeological Resources Assessment</li> </ul>	<p>Developers can mark certain documents as confidential or redacted according to BOEM's criteria.</p>

Comment No.	Comment	Response
	<ul style="list-style-type: none"><li>• Appendix S2 – Terrestrial Archaeological Resources Phase 1B Assessment – REDACTED</li><li>• Appendix T – Historic Resources Visual Effects Assessment (not labeled confidential in COP but no link provided)</li><li>• Appendix W – Economic Modeling Report</li><li>• Appendix Z – Cultural Resources Mitigation Plan</li></ul>	

## O.7. General Comment Summaries and Responses

### O.7.1. General Support

**Table O-34. General Support Comments**

Comment No.	Comment	Response
BOEM-2022-0071-0003	I support the Sunrise Wind, LLC application. This project will bring much needed energy to New York State with minimal environmental impact. I urge the rapid completion of the permit review process to allow this critical infrastructure project to move to construction.	Thank you for your comment.
BOEM-2022-0071-0004	<p>Hello, My name is Eleanor Kobel and I have lived on the east end of Long Island since I was born in 1964. I am in full support for our wind farm and offshore wind power. It's much needed, because of climate change and fossil fuels alone. We need to think about the future. This project will produce clean energy, as well as creating jobs, and secure our natural resources to preserve not only our beautiful east end but our planet. It all has to start somewhere. We can start this change for a better future for not only our children and grandchildren but for our planet.</p> <p>Thank you, Eleanor Kobel</p>	Thank you for your comment.
BOEM-2022-0071-0005	I am Southampton Town resident, a geologist/environmental scientist, a NYS Certified Profession Geologist, and a recreational waterman. I support the development of alternative energy sources and support the Sunrise Wind project. I believe this project will have minimal impact on the environment and will create an overall environmental benefit and create job opportunities.	Thank you for your comment.
BOEM-2022-0071-0006	i am in support of Sunrise Wind LLC's proposed Wind Farm Offshore in New York. Wind farms have proven productive and a safe way to provide electricity and reduce our dependency on fossil fuels, which contribute to global warming. My research has led me to believe that Ordtead is a world class and reliable developer and operator of	Thank you for your comment.

Comment No.	Comment	Response
	wind farm technology and we can feel confident that this development will be constructed safely, securely and using environmentally sound measures.	
BOEM-2022-0071-0007	<p>Progress is an interesting word. It means “the development of a better, advanced stage”. A simple example is electricity. A natural phenomenon such as lightning has progressed to the creation of the generator. This progression is not without caution. Obviously, the use of electricity is an enormous progression, but caution must be used regarding items such as the cost of and source of fuel. The establishment of off shore windmills is a further progression, using the natural phenomenon of wind power. The caution here is the health of the off shore environment and the associated aesthetics. The technology and research today enable us to build submersed infrastructure which will actually enhance the natural environment. This project will be invisible from and on the land. This is truly a step in the right direction.</p>	Thank you for your comment.
BOEM-2022-0071-0008	<p>Relic is a Long Island brand founded on making a local impact on our coastal environments. Our following and supporters consist of thousands of Long Islanders who are passionate about protecting the future of our coastlines. As a sponsor of our beach clean up station program, we find ourselves frequently discussing Sunrise Wind and their offshore wind projects with folks that we meet.</p> <p>From many interesting conversations, we have observed that those who are passionate about Long Island’s environmental future also support of wind energy. We frequently express our opinion that having access to clean energy, such as from this wind farm project, is critical in combating climate change. It is also vital to the future of our marine ecology on Long Island and in the North East.</p> <p>Additionally, relic supports the development of more jobs in this sector for Long Islanders. Together, we hope for a future that can support Long Island’s growing population and the struggling ecology of our coastlines and bays. We strongly feel that this project will play a vital role in achieving this future vision.</p>	Thank you for your comment.
BOEM-2022-0071-	My name is Alex Kravitz and I am a born/raised Long Islander with a dire love for its	Thank you for your

Comment No.	Comment	Response
0009	<p>environment. I have been fortunate to have had the opportunity to work on multiple sustainability projects with the Sunrise Wind organization. There is no question for the need of this clean energy project on Long Island. With the ever-pressing presence of climate change on our local environment, we need to take every step possible to open the door for change. Not only will this project contribute clean energy for our use, but it will also aid in benefiting the local marine life who share the waters nearby to the offshore site. The creation of this underwater structure, better known as an artificial reef, has been proven to be a positive contributor in increasing the habitable areas of our waterways for local marine species. If we are okay with the decimation of our ocean bottom attributed to oil drilling and commercial dragger fishing, we should have absolutely no refrain for the adoption of a clean energy project that will not only provide us a renewable energy source but also a habitat for local marine life.</p>	comment.
BOEM-2022-0071-0010	<p>My name is Brienne Ahearn and I'm the Program &amp; Development Director at The Butterfly Effect Project, a non-profit youth empowerment and mentoring organization that serves young people in Suffolk County. I'm submitting this comment in support of Sunrise Wind's Offshore Wind Farm. The Butterfly Effect Project had the unique experience of partnering with Sunrise Wind to support our chapter located on The Poospatuck Reservation, located in the Mastic area. With the support of Sunrise Wind, we implemented a technology training program that benefited both our Poospatuck youth and seniors. Poospatuck youth participants underwent a brief training program to learn how to navigate tablets, including downloading the necessary programs and applications, and learning how to use all of their functions. They then, in turn, taught their elders and grandparents to use the devices. This technology program benefited two of the most vulnerable populations in these communities; seniors and youth. Not only addressing the lack of access to technology and the inability to navigate it, but also providing our young people with supplemental income. Furthermore, it prepared youth for the upcoming school year, and addressed the issue of isolation among our senior population. Through this program, technology was a point of intergenerational sharing, learning, and relationship building.</p> <p>This project demonstrates Sunrise Wind's investment in the future of local youth and</p>	Thank you for your comment.

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	<p>communities. We all know the existential threat that the reliance on fossil fuels, and the devastating effects of climate change pose to our youth and our futures. Sunrise Wind Farm begins to address this threat, and offers a cleaner and brighter future for our children and communities. Clearly, the company is dedicated to holistic support of the community where it's located- using environmentally sound technology and innovative ideas to show youth what's possible. The Butterfly Effect Project lends its support.</p>	
<p>BOEM-2022-0071-0011</p>	<p>Historically Long Islanders" relationship with local waters has developed their unique sense of identity. Without projects like Sunrise Wind's proposed wind farm, this identity will continue to fade away as our waters become commercially and recreationally unsustainable. We must act quickly to establish wind farm infrastructure to provide residents of the North East with clean energy sources. If we permit dragging and oil drilling, why should we not allow a wind farm that will actually promote habitat for marine species? As the legend said himself, "There will be no Island left for Islanders like me" if we don't act quickly and in a combined effort to reverse the negative impact we have made with our dependence on fossil fuels. I stand in support of this wind farm project and hope that it can be established as soon as possible, as everyday is vital in the extremely time sensitive battle to preserve the state of our environment and identity as Long Islanders.</p>	<p>Thank you for your comment.</p>
<p>BOEM-2022-0071-0012-0001</p>	<p>To whom it may concern: Hi I'm Kelsie Linell. I am proud to say that I hold my 100 ton license and am co-captain of my fathers two fishing vessels the M/V Fleet King and the M/V Fleet Queen. I am proud to be here and support the Sunrise Wind's Draft Environmental Impact Statement. And as a fishing vessel captain, I am also proud to be directly working to support the development and construction of Orsted's Sunrise Wind project. Our environment is changing, and its effects are felt on land and on the water. We need clean energy and we need it now, we need to stop digging ourselves into a hole that we might not be able to get out of. No doubt, at first Offshore wind energy was scary. But the more my family did our own research, we realized that the concerns we and other fishermen had -while real- real, but with investigation and real engagement with offshore wind people, we cam to our own conclusion. Offshore wind</p>	<p>Thank you for your comment.</p>

Comment No.	Comment	Response
	<p>could be a new way to sustain our family business. In fact, the scout work we have done through Sea Services has allowed me to stay working on the water. Today, I still have to juggle a few things to make ends meet, but I see our offshore wind work as a way for me to continue the family fishing business for another generation. And I think it's very important to be doing our part to help address the warming climate. This will sound corny, but nature has been good to us, and it seems to me that this is a way for us to give a little back to nature. Please approve Sunrise Wind's DEIS as quickly as possible and move through the long list of other offshore wind projects as thoroughly and as quickly as possible! Thank you for your time. Kelsie Linell Co-Captain M/V Fleet King / M/V Fleet Queen 101 Mill Hill Road South Chatham, MA 02659</p>	
<p>BOEM-2022-0071-0012-0002</p>	<p>To whom it may concern: My name is Matt Linnell and I own the M/V Fleet King and M/V Fleet Queen. I have been a commercial fisherman my entire adult life. For generations, we have depended on the very waters where Orsted's Sunrise Wind will be constructed for our livelihood. I am here to add my support for the Project's "DEIS" and to urge you to expedite its full approval. Let me tell you why. Like everyone who fishes or transits through these so called "lease areas," we were extremely concerned about offshore wind development. The idea seemed bad on its face. We were all frightened that closing down all these fishing grounds would crush our business. We heard that these offshore wind companies hailing from across the Atlantic didn't have any real interest in our industry and in working with us. We heard a lot of things and we were frightened. But over my lifetime, fishing has grown far more challenging due to migration, quotas and over-regulation. It is harder than ever to make a living doing what we love. So my family and a group of fishermen dug in to try to answer the question for ourselves: "Is offshore wind the final nail in our coffin, or could it be a new opportunity?" Everyone is entitled to their own opinions. And I am offering ours. We found that some of the information being put out there was just incorrect. The most important issue was that these wind farms in the U.S. will not be closed to fishing and turbines will be spaced to allow for safe fishing and safe passage. There is no doubt that a nautical mile is plenty of space to set gear and to safely transit. We will have to get used to it, but that's more than enough space. We found that many other things</p>	<p>Thank you for your comment.</p>



Comment No.	Comment	Response
	<p>have proven to be less alarming than they may sound in the press. So, about 18 months ago, we qualified to become Vessel Partners with Sea Services. And with their support and funding, we upgraded our two vessels" health and safety platforms. And that resulted in much needed additional work. We have since scouted for about 180 days in the northeast and in the mid-atlantic. I am proud to say that there were zero resulting gear strikes. And through Sea Services, we have had the opportunity to work up close with Orsted and a few other offshore wind developers. This has allowed us to build trust and to realize that there is a sincerity to this vision working together. Offshore wind work won't be all roses. But that's fine. Fishing isn't all roses either. But our family believes in the future of these two industries. And that In the combination lies the difference between a struggling generational fishing family, and a diversified, thriving family business. Therefore, I offer my complete and enthusiastic support for Sunrise Wind's DEIS. Sincerely, Matt Linnell 101 Mill Hill Road South Chatham, MA 02659</p>	
<p>BOEM-2022-0071-0012-0003</p>	<p>To whom it may concern: My name is Rob Cabral, and I have been a commercial fisherman for over 35 years. I own, and captain the F/V Provider. I speak on behalf of myself, and my family, as 3 of my 4 sons have worked aboard the Provider while in service to Orsted's projects. While it is no secret that many fisherman have concerns about offshore wind, my family decided to get involved and address these issues on a first hand basis. Then, through the leadership of of Sea Services, and the commitment from Orsted, we spent nearly 4 months upgrading certain physical requirements onboard the vessel, as well as extensive health and safety training and certifications for our captains, and all our crew members. It was quite an eye opening process, and I feel that all those involved have benefited greatly for it. This allowed us to win a first-ever commercial fishing scouting contract with Sea Services and Orsted, becoming the first commercial fishing vessel in the U.S. to meet the stringent training, environmental, and safety standards required for scout, and guard work in the offshore wind field. Orsted's commitment to having qualified fisherman involved in its projects has been quite surprising for a skeptical fisherman like myself. Through Sea Services, Orsted supplied funding for the necessary vessel upgrades, and all the</p>	<p>Thank you for your comment.</p>

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	<p>required training. Without this support we would most likely not have been involved with Orsted or offshore wind projects, as it all would have simply been too daunting of a task for one small company. Im happy to say that this year starts our 4th season working offshore wind projects. And in that time Orsted’s commitment, and standards to safety protocols, as well as environmental awareness has been second to none. We have logged over 450 days at sea, on various scouting projects. I am very proud to say that in all that time, the offshore wind research vessels that we have scouted for have had zero gear conflicts with the US commercial fishing fleet. I am proud of this statistic because it means that we have prevented a lot of guys from loosing their gear, and we have saved research vessels a lot of time and money from not having to stop the project to disentangle fishing gear from their scientific equipement. I personally have met some resistance, and slight animosity from some of my peers in the commercial fishing industry. This has not been an easy thing to deal with, as some of these guys I have known and worked with for over 30 years. Over time, some have seen the value of our work, especially the fisherman who have had gear in and around the survey areas. I have had many personal conversations with these fisherman, who are truly grateful for our work, and are comforted to know we are there to document their gear, and it’s location, and to make sure the survey vessels know, as well. I can speak for myself, and my crew, when I say that we are grateful for the opportunity to be involved with this project, and after what we have seen firsthand, are fully in support of the Sunrise Wind Project going forward. Sincerely, Captain Robert Cabral F/V Provider</p>	
<p>BOEM-2022-0071-0012-0004</p>	<p>To whom it may concern: My name is Robert Groves. I’d like to thank BOEM for this opportunity to speak in support of Sunrise Wind’s Draft Environmental Impact Statement. I have been a professional mariner for longer than I want to admit! I have fished, I have captained fishing vessels, offshore supply vessels, and most recently tug boats. I hold a 1600 ton Master of Towing license. I strongly believe in the need to accelerate and advance renewable energy and offshore wind. Yes, I have solar panels on my roof! But in particular, I strongly support the development and construction of Orsted’s Sunrise Wind project. The ocean environment is being effected by climate</p>	<p>Thank you for your comment.</p>

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	<p>warming today and I want to thank BOEM for doing the rigorous work of evaluating this offshore wind project and the many others in the queue. We need to get offshore wind mills spinning, and creating massive amounts of clean energy as soon as possible. I've recently captained Sea Services Vessel Partner M/V New Horizon for 40 days of scouting work with a crew of 5. Scouting work is good and important work. Because fishermen are so familiar with these waters and know how to communicate with other fishermen, our results are better than those of conventional vessels. It is clear to me that Orsted and the other offshore wind companies we have worked with have a real interest in reducing conflict. Scout work is just one example. Also, anyone who has fished has horror stories about one life threatening situation they have faced or another. Health and Safety are always a concern for guys on the water, and offshore wind developers who are using Sea Services are applying (and funding) very high HSE standards to boats and crews for upgrades and training. This is a big, big deal. Last, I know a lot of guys who just can't make a living fishing full-time anymore. Sunrise Wind and other offshore wind projects who have chosen to use fishing vessels for scouting and guard work have already provided a new way to bring home additional income.</p>	
<p>BOEM-2022-0071-0012-0005</p>	<p>To whom it may concern: My name is Scott Dernberger and I am Co-Captain on the F/V Provider. I have been a fisherman since 1991, but when I was approached with about offshore wind projects, I had serious doubts. Although many of my peers did not necessarily agree with the wind farm we decided to get involved. With help from Orsted we were able to get needed vessel upgrades and safety training for everyone onboard. Over the past several years that we have been scouting, we have developed a level of trust with our colleagues in the fishing industry that we are there to represent both them and Orsted to avoid gear conflicts. Many have expressed their appreciation to me for "keeping an eye" on their gear and helping avoid any conflicts by sharing gear positions with survey boats. Being the first scout vessel there was a learning curve that SS was there to help us through. I fully support the Sunrise Wind project and am happy to be a part of it. Sincerely, Captain Scott Dernberger</p>	<p>Thank you for your comment.</p>
<p>BOEM-2022-0071-0012-0006</p>	<p>To whom it may concern: My name is Scott Yerman. I have been fishing for 40 years, starting with my father when I was 8 years old. While I don't particularly enjoy</p>	<p>Thank you for your comment.</p>

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	<p>speaking at public hearings, I am actually glad to be here tonight in support of Orsted's Sunrise Wind project. There are three things that I want to share. 1. The concerns that remain out there are real about offshore wind, and I shared them. But after really digging into offshore wind with my father and other fishermen who are now part vessel partners in the Sea Services group, I came away much more realized than I thought possible. Particularly with the wind farms remaining open for fishing and the turbines spaced a mile apart, my biggest concerns were resolved. If more people did the same work, I'm pretty sure that they would come to the same conclusions we have: the Offshore Wind and Commercial fishing will be fine side by side for years to come. 2. Orsted's team have been straight shooters with us from the beginning a few years back. We were tough on them. As fishermen, we like straight talk and as it turns out, so do the Dane's. They do what they say. I can't ask for more than that. 3. Orsted is providing guys like me a new way to earn money. And it has already been good for me, and for my family. I am looking forward to working on Sunrise Wind once it's approved and into construction next year. Thank you. Scott Yerman Captain M/V Provider 5 C Street Westerly RI, 02891</p>	
<p>BOEM-2022-0071-0012-0007</p>	<p>To whom it may concern: My name is Tim Linell. I am the co-captain of the M/V Fleet King and M/V Fleet Queen. I have been a commercial fisherman for nearly 30 years. I am here tonight to support the Sunrise Wind DEIS. After a lot of concern and study I'm now very optimistic because we are actually working with offshore wind developers. And I don't see as much doom and gloom that you hear about on the docks, or read about in the press. Offshore wind is coming and we are making it work for us. As Sea Services Vessel Partners, we upgraded our two vessels' health and safety platforms. We have scouted for fixed gear for about 6 months and around 9000 miles of ocean ahead of large research vessels in the northeast and in the mid-atlantic. I am proud to say that there were zero resulting gear entanglements. With fishing regulations displacing many fishermen, we need these new opportunities to supplement shrinking fishing income. Tim Linell Co-Captain M/V Fleet King / M/V Fleet Queen 101 Mill Hill Road South Chatham, MA 02659</p>	<p>Thank you for your comment.</p>
<p>BOEM-2022-0071-</p>	<p>To whom it may concern: My name is C.J. Pinto. I'm here to fully lend my support for</p>	<p>Thank you for your</p>

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0012-0008	<p>Orsted/ Sunrise Wind Project draft DEIS. As a resident of Long Island, and having captained fishing vessels to tug boats for over 25 years, I am truly excited about the advance of offshore wind in the United States. Today, active fishing vessels need alternative revenue sources to keep boats fishing in the face of unrelenting government regulations. Offshore wind development and construction is playing an important role in allowing interested captain's new commercial opportunities. As vessel partners for Sea Services North America, two of our vessels the F/V Jo Ann V and F/V Gabrielle Elizabeth will be deployed on New York's Southfork and Sunrise Wind projects. This means important, additional work for captains and crews who otherwise might not get it. Orsted is the world leader in offshore wind farms for a reason. The Sunrise team has demonstrated a level of professionalism that seems unrivaled in the industry. And we are honored to play a small role in constructing these early wind farms. We know that this is only the beginning. We are investing in the offshore wind scout and guard vessel space and see Southfork and Sunrise Wind as the start of new business opportunities for our company and the men and women we employ. Please approve the Sunrise Wind Draft Environmental Impact Statement at speed to help this project create much needed jobs. Sincerely, Captain CJ Pinto Long Island, New York</p>	comment.
BOEM-2022-0071-0012-0009	<p>To whom it may concern: My name is Gary Yerman and I've been a commercial fisherman for 50 years. My son and I are the owners of New London Seafood Distributors, a New London-based unloading facility, and we have owned the business since 1989. It is home base for a dozen commercial fishing vessels both large and small, operating inshore in the sound and offshore to more than 100 miles. We are vital to their operations providing fuel, ice, arranging shipping of their annual 6,000,000 to 8,000,000 pounds of seafood to various markets. I write on behalf of both New London Seafood Distributors and as the co-founder of Sea Services, a multi-state consortium of active fishermen seeking to help build US offshore wind farms. I write in full support of Ørsted/Eversource's Sunrise Wind project. While offshore wind's development presents uncertainty to fishermen, it is just uncertainty. There is no doubt that uncertainty can be frightening and while the concerns raised by others was</p>	Thank you for your comment.

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	<p>important, we have to be willing to deal with facts rather than fear-based narratives. We have done a great deal of investigation and research and found that each of the concerns raised have been raised in wind projects around the world, with virtually no correlation between early concerns and actual commercial impact where fishing grounds remained open. Moreover, here in the U.S. we are calling on the global data and industry best practices to find solutions that will address the need for green energy, the fishing concerns and the fears of what is being labeled as “unknown.” As commercial fishermen, local businessmen and concerned citizens, we are first concerned about our community and profitability. Other fishermen have decided to pursue dollars in the form of disruption payments, but we have found another way. We have decided to pursue a sustainable and scalable way to participate in the development, to be constructively at the table. So, once we achieved a level of comfort with the Ørsted team, we began to look for ways for our vessels, along with others, to work the waters with the offshore wind industry. We have spent time and energy with the Orsted’s Sunrise Wind team, and we can say they are the very best in the offshore industry. Their investment in the project means a great deal for several New England fishing communities and we are already seeing the economic impact in New London. We want to see Sunrise Wind move forward rapidly. We have worked for nearly 4 years with Ørsted’s Northeast team and they have been straightforward, accessible and as open as we think they can be. We understand the concerns of some of our fishing colleagues, but given the level of commitment to investment, education, job creation and reduction of fossil fuels, we have seen benefits and know that coexistence is a good thing, for the greater good. Two years ago, two associates and I took a trip to Kilkeel Northern Ireland to meet with a group of fishermen organized into an efficient cooperative that provides scout and safety vessels when they are not fishing. We learned firsthand how the wind farms have impacted them and how they and the community have profited by them. We shared our concerns and discussed how they have worked together for a positive outcome. The results we saw were more than encouraging and we decided to put in the time and effort to duplicate the model. That model has become Sea Services North America, LLC. We recognize Ørsted’s</p>	

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	<p>commitments to fishermen as being the first to offer a substantial commercial contract that includes local fishermen to provide scout and safety vessels on the Sunrise Wind project. We completed thousands of miles of scouting with no issues and with that success it is providing further opportunities to commercial fishermen as guard vessels. That effort was rewarded with contracts that will supplement fishermen’s revenue that is capped by regulations and quotas. That new revenue source comes at a cost. Learning the technology, upgrading health, safety and environmental standards and actually doing the work is required. The opportunities are very real and with Orsted’s commitment, this is not a zero-sum game. It can be a win win. We strongly urge you to move the Sunrise Wind project forward with all appropriate speed. Sincerely, Gary Yerman New London Seafood Distributors 114 Smith Street New London, CT 06320 Cell 860-227-7283</p>	
BOEM-2022-0071-0015	<p>I support it fully...construction always has some impacts but look at what the impacts are. We need to address our energy problems and stop continuing with fossil fuel. It’s time for a change , wind power is the clear way to move forward and the time is now..</p>	<p>Thank you for your comment.</p>
BOEM-2022-0071-0018	<p>As an organization that is part of the developing U.S offshore wind industry supply chain, we support the Sunrise Wind Project. we believe that the Sunrise Wind Project will benefit the U.S. economy, environment, and our nation’s energy security. We urge you to favorably review this project on its current timeline and keep our industry developing and progressing.</p> <p>Dear Program Manager, We are writing to you today in support of the Sunrise Wind project. As America grows its offshore wind industry, we have the opportunity to shape the future of the energy market in the United States. Woods Hole Group offers over 35 years of experience of solving environmental problems, by providing data and support services, with a focus on serving clients along the coast, in the ocean, and in wetland and terrestrial environments. Relying on service, technical excellence and leadership, Woods Hole Group employs experienced engineers, scientists, and technicians. Initially formed in 1986, Woods Hole Group has nearly 100 employees between corporate headquarters in Massachusetts and client-centered regional offices</p>	<p>Thank you for your comment.</p>

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	<p>in Delaware, Maryland, and Texas. As part of the global CLS Group of companies, Woods Hole Group offers a broad range of services and expertise to benefit our clients and teaming partners. We have a real opportunity to build the future of the energy industry in our country. We are uniquely positioned to build the future of the green-energy industry in the US through the creation of lucrative job opportunities that will be sought after by those looking to build their American dream, create families, and purchase homes. We have the chance to create a green economy that will help to preserve and sustain our planet and deliver the next generation a cleaner environment and stronger future. It is a rare chance to get in on the ground floor of an economic revolution. This is our opportunity to impact the future through the creation of new relationships, supply lines, and new markets. We are proud to be a part of this revolution. BOEM provided multiple alternatives for further review. Within those alternatives, there is one that we believe BOEM should not consider – No Action. No Action could hinder further development of the developing U.S. offshore wind domestic supply chain. The supply chain needs clarity and confidence that projects can move forward, in a timely manner. Sunrise Wind will benefit the economy, environment, and our nation’s energy security. We urge you to favorably review this project on its current timeline and keep our industry progressing.</p>	
<p>BOEM-2022-0071-0019</p>	<p>February 9, 2023</p> <p>Local 338 RWDSU/UFCW, a labor union that represents over 13,000 men and women employed in a variety of different industries across New York State, including, food retail, pharmaceutical retail, health care and human services, transportation, agriculture, and cannabis.</p> <p>As a labor organization, we strongly support offshore wind developments. Large scale utility development like Sunrise Wind and other offshore wind projects will not only reduce our carbon footprint but will also mean a tremendous amount of economic opportunity in the form of jobs and economic benefits. We strongly believe that Americans should not have to choose between a good job and a clean environment –</p>	<p>Thank you for your comment.</p>



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	<p>we can and must have both.</p> <p>Furthermore, Offshore wind is urgently needed in the U.S. There is a huge coastal electricity demand and there is a world class resource on a large buildable continental shelf off the Northeast coast. Sunrise Wind is an important project for the nation's offshore wind industry. The comprehensive Draft Environmental Impact Statement outlines this in great detail. This project has gained deep and diverse stakeholder support among local, environmental and many labor organizations on Long Island as it has delivered on its economic commitments over the past several years. There was no opposition to the certification conditions for Sunrise Wind's transmission line which was drafted during the Article VII siting process by the New York State Public Service Commission.</p> <p>Orsted and Eversource's Sunrise Wind project is a broadly supported opportunity to not only drive the nation's clean energy future, but create quality, family sustaining jobs at the same time. Local 338 RWDSU/UFCW urges BOEM to move the Sunrise Wind project forward.</p>	
BOEM-2022-0071-0020	<p>As someone who has lived on Long Island for over 70 years, I believe that the offshore wind project is essential for the continued growth of the Long Island Community. The project is endorsed by local environmental and labor organizations. There is a constant demand for electricity and this project will provide renewable energy without pollution. I strongly urge BOEM to allow this project to move forward. This is a WIN-WIN for both the workers and residents who live in the Long Island Community.</p>	Thank you for your comment.
BOEM-2022-0071-0022	<p>Dear Program Manager: I am writing to you today in support of the Sunrise Wind project. As America grows its offshore wind industry, we have the opportunity to shape the future of the energy market in the United States. Global Maritime is a leading marine, offshore and engineering consultancy. Our 20 offices around the World were involved in 7000 turbine installations across the world. In addition to this unique global experience, our US office has 20-year experience in the Offshore Industry and has been pioneering the US Offshore Wind industry with involvement in</p>	Thank you for your comment.

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	<p>the first US commercial farm: Block Island Wind; more recently we were awarded scopes on Coastal Virginia Offshore Wind, New England Aqua Ventus, Ocean Wind, South Fork Wind, Revolution Wind and Sunrise Wind. Based on our understanding of the positive impact of Offshore Wind internationally, and on our US experience of the industry’s supply chain and labor capabilities, we are confident that carrying out the Sunrise Wind project will deliver economic and social benefits which are essential to the sustainable development of the state it is located in. We have the unique opportunity to build the future of the energy industry in our country. We are uniquely positioned to build the future of the green-energy industry in the US through the creation of lucrative job opportunities that will be sought after by those looking to build their American dream, create families, and purchase homes. We have the opportunity to create a green economy that will save our planet and deliver the next generation a cleaner environment and stronger future. It is a rare opportunity to get in on the ground floor of an economic revolution. This is our window to impact the future through the creation of new relationships, supply lines, and new markets. We are proud to be a part of this revolution. BOEM provided multiple alternatives for further review. Within those alternatives, there is one that BOEM should not consider – No Action. No Action could hinder further development of the U.S. offshore wind domestic supply chain. The supply chain needs clarity and confidence that projects can move forward, and in a timely manner. We need Sunrise Wind to be built. Sunrise Wind is good for the economy, environment, and our nation’s energy security. I urge you to approve this project on its current timeline and keep our industry working.</p>	
<p>BOEM-2022-0071-0023</p>	<p>On behalf of the Building and Construction Trades Council of Nassau and Suffolk Counties, I urge BOEM to take the necessary steps to move Sunrise Wind project forward. The Building and Construction Trades Council of Nassau and Suffolk Counties represents 65,000 members across 36 affiliated local unions. As all of our members are local, we are the true economic driver and barometer of Long Island. The offshore wind industry is imperative to the economic future of our council and subsequently our region. Sunrise Wind coupled with the other four currently awarded offshore wind projects to be sited off Long Island offers significant opportunity for economic</p>	<p>Thank you for your comment.</p>

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	<p>development and the creation of good-paying union and green-economy jobs. Long Island will establish a hub for an offshore wind workforce that will be at the center of a major industry that both strengthens our economy and combats climate change. Sunrise Wind is critical to meeting New York State’s clean energy mandate which requires 70% of New York’s electricity generation come from renewable energy by 2030 and calls for the development of 9,000 megawatts of offshore wind energy by 2035. Once again, I urge BOEM to move the Sunrise Wind project forward.</p> <p>Matthew Aracich President</p>	
BOEM-2022-0071-0024	<p>Dear Program Manager: I am writing to you today in support of the Sunrise Wind project. As a company that has been involved in the Offshore Wind Industry since it’s infancy on the east coast of the US, we are direct beneficiaries of the incredible growth opportunities offshore wind presents for companies both locally and nationally. Headquartered in NJ, Alpine has been operating in the offshore sector since 1957. We provide geophysical, geotechnical, hydrographic, environmental and oceanographic data collection services. Until offshore wind started developing in earnest on the east coast, Alpine had not seen in decades the kind of growth it encountered in the last 6 years. In the last 3 years alone, we have almost tripled in the number of people we employ and the revenue we generate. All of this growth, is due to the boom in offshore wind. The very nature of offshore wind construction, requires local manufacturing, and local employment. Alpine’s growth and success is testament to what Sunrise Wind is capable of offering to the communities it touches. Offshore wind, and Sunrise Wind in particular, is uniquely positioned to build the future of the green-energy industry in the US through the creation of lucrative job opportunities that will be sought after by those looking to build their American dream, create families, and purchase homes. We have the opportunity to create a green economy that will save our planet and deliver the next generation a cleaner environment and stronger future. I am making this statement as the President and owner of a company that has long been part of the Oil and Gas industry and has profited from its participation in the fossil fuel economy. However, it is important that we seize the opportunity to take</p>	Thank you for your comment.

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	<p>advantage of a less damaging source of energy. Offshore Wind presents a unique opportunity to not only provide sustainable and reliable energy, but also help deal with our climate change challenges. BOEM provided six alternatives for further review. Within those six alternatives, there is one that BOEM should not consider – No Action. No Action could hinder further development of the U.S. offshore wind domestic supply chain. The supply chain needs clarity and confidence that projects can move forward, and in a timely manner. That clarity generates capital investment and encourages hiring. Alpine has invested millions in equipment and hiring of staff since it became involved in the first offshore wind projects. We need Sunrise Wind to be built. Sunrise Wind is good for the economy, and in particular the Tri-State area which as a NJ company we are part of. It is also a win for the environment, and our nation’s energy security. I urge you to approve this project on its current timeline and keep our industry working.</p>	
<p>BOEM-2022-0071-0028</p>	<p>To Whom It May Concern:</p> <p>My name is Esther Hernandez-Kramer. I am a teacher and a union member. As a union member, I support offshore wind. Projects like Sunrise Wind will not only reduce our carbon footprint but they will also provide economic opportunity in the form of jobs and economic benefits. Americans can and must have good jobs and a clean environment. I urge BOEM to move forward with BOEM’s permitting process with regards to the Orsted and Eversource’s Sunrise Wind project.</p>	<p>Thank you for your comment.</p>
<p>BOEM-2022-0071-0030</p>	<p>As a person who has worked in the renewable energy space for nearly 20 years, starting in solar and evolving into wind, I am proud to be involved with the Sunrise Wind project as a true pioneer of offshore wind in the US. While no solution to our energy needs is perfect, offshore wind is by far the best solution available to our energy crisis. Additionally, I see tremendous opportunities for offshore wind to evolve further into a very sustainable and beneficial practice. One of many examples is the opportunity to create structure and habitat for our marine environment. I look forward to Sunrise Wind paving the way for a cleaner and greener future for our planet.</p>	<p>Thank you for your comment.</p>

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BOEM-2022-0071-0034	<p>Dear Program Manager: I am writing to you today to express my strong support for the Sunrise Wind project. Edison Chouest Offshore ("ECO") is headquartered in Louisiana and has been in the business of engineering, constructing, owning and operating offshore marine vessels since 1960. We are recognized today as the most diverse and dynamic marine transportation solution provider in the world. ECO operates a growing fleet of almost 300 vessels, up to 525 feet in length, that serves a global customer base. ECO is the largest provider of offshore marine vessels to the U.S. offshore marine industry, the largest provider of offshore marine service vessels to the Central and South American markets and provide world-class services on every ocean, including the Arctic and Antarctic regions. ECO also operates port terminal facilities in the United States, Brazil and Guyana, where we provide terminal and logistics support services to most major offshore energy producers. Staying on the forefront of new technologies is an integral part of the ECO vision, as evidenced by recent patents and advances in the areas of emissionreduction technologies, integrated bridge systems, remote monitoring of vessel systems and global communications. The success of ECO has been built upon constructing and operating the highest quality and most technologically advanced vessels in the world, and maintain an aggressive focus on reduction of greenhouse gas emissions. ECO's diverse fleet of vessels serves oil &amp; gas, U.S. miliary, the river cuise industry as is currently construction the first two (2) U.S. Jones Act-compliant windfarm Service Operations Vessels (SOV). Renewable Energy is not new in the United States but offshore wind is only now at the threshold of becoming a national industry in the United States with a pipeline of over 35,000 megawatts of power across thirteen (13) states in various stages of development. In order to fully and responsibly develop each wind farm project the supply chain of required vessels, components, materials, shore facilities and human capital is enormous. The United States is uniquely positioned to build the future of the green-energy industry while creating lucrative job opportunities that will be sought after by those looking to build their American dream, create families, and purchase homes. We have the real opportunity to create a green economy that will save our planet and deliver the next generation a cleaner environment and stronger future. This is a rare opportunity and</p>	Thank you for your comment.

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	<p>ECO is proud to be a part of this revolution. BOEM has provided multiple alternatives for further review. Within those alternatives, there is one that we encourage BOEM not to consider and that is "No Action." The alternative of "No Action" would be a major impediment to the U.S. offshore wind domestic supply chain development at a critical point in this nascent industry which requires clarity and confidence that projects will move forward. ECO, and the United States, needs Sunrise Wind to be built. This project is good for the U.S. economy, the environment, and for our nation's long-term energy security. I urge you to approve this project on its current timeline and keep our industry working.</p>	
BOEM-2022-0071-0035	<p>Sunrise Wind coupled with four other currently awarded offshore wind projects to be sited off Long Island's shores offers significant opportunities for economic development and the creation of good-paying union jobs. Long Island can become the hub for an offshore wind workforce that will be at the center of a major industry that both strengthens our economy and fights climate change. I urge BOEM to allow the permitting process to move forward by approving Sunrise Wind's Draft Environmental Impact Statement.</p>	Thank you for your comment.
BOEM-2022-0071-0037	<p>As a resident of mastic Beach, a single father of three and a person struggling to make ends meet, I want to express my support for the sunrise wind farm. I worry about the world my kids are growing up in and the uncertainty of our resources like clean water, affordable costs of living and our dependence on fossil fuels. This is the only logical path to a cleaner and more sustainable future. We need this project to lead the way to more like it.</p>	Thank you for your comment.
BOEM-2022-0071-0039	<p>As a resident of Aquebogue, I am writing in support of Sunrise Wind. Offshore wind is a critical path to clean energy and opportunity here in New York. Sunrise Wind will create hundreds of jobs to generate enough clean energy for nearly 600,000 homes each year. Please allow this project to move forward so we can realize its immense benefits. Thank you.</p>	Thank you for your comment.
BOEM-2022-0071-0040	<p>The urgent need for offshore wind for Long Island becomes more apparent each day. The rate that the seas rise is not due to nature, but due to human activity. Sunrise</p>	Thank you for your comment.

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	<p>Wind can help to minimize it. There is also a great opportunity off our shores to generate electricity from a renewable resource just miles away. I support Sunrise Wind Farm. We all should.</p>	
<p>BOEM-2022-0071-0041</p>	<p>The New York League of Conservation Voters is a New York statewide advocacy organization committed to renewable energy and a clean energy future. Offshore wind is a top priority for us.</p> <p>Offshore wind is critical to meet New York’s and the Country’s renewable energy goals, reduce our reliance on fossil fuels and rebuild around a green energy economy, which will provide family-supporting jobs and improve public health. New York has committed to 70% renewable energy by 2030 and 100% clean energy by 2040, including 9,000 megawatts of offshore wind by 2035.</p> <p>But we won’t meet our goals if we only talk about clean energy. It must be turned into reality with real projects on the ground.</p> <p>Sunrise Wind is key to meeting these goals.</p> <p>Sunrise Wind brings significant environmental and economic benefits.</p> <p>This project will generate enough clean energy to power approximately six hundred thousand homes, and will eliminate the generation of more than fifty million tons of CO2 over the project’s lifetime by displacing polluting fossil fuel power.</p> <p>Beyond the environmental benefits, Sunrise Wind will promote clean, reliable, and safe development of domestic energy sources and clean energy job creation. Hundreds of millions of dollars will be invested, and more than eight hundred jobs will be created, including family-sustaining union jobs.</p> <p>The Sunrise Wind team have been nothing short of amazing partners in this process,</p>	<p>Thank you for your comment.</p>

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	<p>making every effort to receive and implement community feedback. This shows in the DEIS report where the majority of the impacts identified are moderate or below, with many important benefits as well.</p> <p>The New York League of Conservation Voters supports the Sunrise Wind Project and encourages the speedy advancement of the project. Thank you for the opportunity to comment on this important project.</p>	
BOEM-2022-0071-0042	I support the Sunrise Wind, LLC's proposed wind farm. We need to accelerate the clean energy transition. As a resident of NYState, I want to reduce our reliance on all dirty and polluting and nonrenewable energy sources. I drive an electric car which I charge with my solar panels and want to see our state act as a leader in this necessary and beneficial transition.	Thank you for your comment.
BOEM-2022-0071-0043	We need to use every arrow in our quiver to reduce our dependence on fossil fuels. Mother nature has provided many opportunities for us to live a more sustainable life. Technology and leadership should be the main drivers of change.	Thank you for your comment.
BOEM-2022-0071-0047	I am a resident of Glen Head, NY (Long Island) and fully support the Sunrise Wind Farm Offshore. I am an Energy consultant and have studied wind generation as part of my consultancy and for my Masters Degree in Energy Management. I am not at all involved in the Sunrise Wind Farm. Diversifying our energy supply and converting to renewable energy sources are essential to a sustainable energy future.	Thank you for your comment.
BOEM-2022-0071-0050	Sunrise Wind coupled with four other currently awarded offshore wind projects to be sited off Long Island's shores offers significant opportunities for economic development and the creation of good-paying union jobs. Long Island can become the hub for an offshore wind workforce that will be at the center of a major industry that both strengthens our economy and fights climate change. I urge BOEM to allow the permitting process to move forward by approving Sunrise Wind's Draft Environmental Impact Statement.	Thank you for your comment.
BOEM-2022-0071-0051	Hello, My name is Joseph O.Kommer and I reside in Riverhead NY as a permanent resident. I am a long term resident of the east end of Long Island and spent the	Thank you for your comment.



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	<p>previous 30 plus years teaching Environmental and Marine Science to students at Westhampton Beach High School. Both my time as a teacher and my time before that as a student of marine and environmental sciences across the US has brought me to strongly support the Sunrise Wind Farm Offshore generation project. It is incumbent upon BOEM, NMFS, USFW and the USCorps of Engineers to maintain vigilance in identifying and mitigating foreseen and unforeseen adverse impacts. All development has negative impacts. In such environments as the continental shelf and the waters surrounding it is of the utmost necessity to implement those plans necessary to protect those resources and to do so into perpetuity. It must continue to be a paramount concern as we (society) begin to transition to alternative energy sources in our changing world. The necessity of developing these resources does not mean it can be done cheaply or with impunity. We do however have the best of experience in developing offshore projects based upon development of petroleum resources in areas like the North Sea and the Gulf of Mexico. That experience is replete with success in extraction and success in mitigating even the horrific effects of marine spills in sensitive areas. The necessity, the imperative is to do this project and set the standards for projects to follow that avoid the worst of those things and account for the others with utmost care and planning and implementation. The expertise required is already on deck. The scientific community that I know is already involved in the studies that will help characterize the organisms of greatest concern and the environments they transit or call home. It is my hope that the scientists engineers and planners do their job and that the politics and economics of developing these necessary resources work to the ultimate success of this and other projects like it.</p>	
BOEM-2022-0071-0057	<p>Offshore wind is urgently needed in the U.S. There is a huge coastal electricity demand and there is a world class resource on a large buildable continental shelf off the Northeast coast. Sunrise Wind is an important project for the nation’s offshore wind industry. The comprehensive Draft Environmental Impact Statement outlines this in great detail. This project has gained deep and diverse stakeholder support among local, environmental and labor organizations on Long Island as it has delivered on its economic commitments over the past several years .There was no opposition to the</p>	Thank you for your comment.

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	certification conditions for Sunrise Wind’s transmission line which was drafted during the Article VII siting process by the New York State Public Service Commission. With such broad community support, I urge BOEM to move the Sunrise Wind project forward.	
BOEM-2022-0071-0058	Offshore wind is urgently needed in the U.S. There is a huge coastal electricity demand and there is a world class resource on a large buildable continental shelf off the Northeast coast. Sunrise Wind is an important project for the nation’s offshore wind industry. The comprehensive Draft Environmental Impact Statement outlines this in great detail. This project has gained deep and diverse stakeholder support among local, environmental and labor organizations on Long Island as it has delivered on its economic commitments over the past several years .There was no opposition to the certification conditions for Sunrise Wind’s	Thank you for your comment.
BOEM-2022-0071-0059	Construction of the Sunrise Wind project will be performed under a Project Labor Agreement and create more than 800 direct jobs and over 1200 indirect jobs in New York. Creating union jobs will boost our local economies and provide opportunities for the next generation of workers through apprenticeship training. I urge BOEM to permit this project and put our men and women in the building trades to work.	Thank you for your comment.
BOEM-2022-0071-0061	I am writing today because the jobs this will bring to our membership and future membership will be significant and it will be a great boost to the local community’s through out New York state. Teamsters Local 294 is in full support of this project.	Thank you for your comment.
BOEM-2022-0071-0071	Program Manager: I write on behalf of the 10,000 members of Local 1102 RWDSU/UFCW. Many of our union members and their families live on Long Island and in the Tri-State area. As a diverse union, we know that a forward-looking economy is the best way to empower working people. The Sunrise Offshore Wind Project is exactly the type of development that our members are seeking. Firstly, Local 1102 members support efforts to use the renewable resources at our fingertips to reduce our reliance on fossil fuels. After seeing the devastating effects of climate change with weather events such as Superstorm Sandy, our members and their families are ready to power the transition to a green economy. As a region and as a nation we should strive to lead	Thank you for your comment.

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	<p>on these technologies and systems to initiate a clean energy revolution. It is the right choice both economically and environmentally. The Sunrise Wind Project, led by the Orsted and Eversource joint venture, is a huge step in the right direction. Moreover, this project brings indirect opportunities beyond the clean energy jobs alone. With a new industry to meet New York State’s 70% clean energy by 2030 goal, thousands of jobs will be needed to service, feed, and clothe the workers making the Sunrise Wind Project operational. With labor-management already cooperating, the Orsted/Eversource venture will boost local economies for generations to come with good, union jobs. We must take action to reshape our economy and energy system in the fight against climate change. The Sunrise Offshore Wind Project is a perfect step forward and Local 1102 proudly stands with this project’s diverse stakeholder group. We strongly urge BOEM to move forward with Sunrise Wind’s permitting process.</p>	
<p>BOEM-2022-0071-0072</p>	<p>Program Manager Office of renewable Energy Bureau of Ocean Energy Management, Offshore wind is urgently needed in the U.S. There is a huge coastal electricity demand and there is a world class resource on a buildable continental shelf off the Northeast coast. Sunrise Wind is an important project for the nation’s offshore wind industry. Construction of the Sunrise Wind project will be performed under a project Labor Agreement and create more than 800 direct jobs and over 1200 indirect jobs in New York. As a union member, I support offshore wind. Large scale utility development like Sunrise Wind and other offshore wind projects will not only reduce our carbon footprint but will also mean a tremendous amount of economic opportunity in the form of jobs and economic benefits. Creating union jobs will boost our local economies and provide opportunities for the next generation of workers through apprenticeship training. I urge BOEM to permit this project and put our men and women in the building trades to work. In Solidarity, Michael Gendron CWA 1109</p>	<p>Thank you for your comment.</p>
<p>BOEM-2022-0071-0073</p>	<p>I’m a big supporter of the offshore wind and the Sunrise Wind project. I live in Holbrook, Town of Islip. We need to transition from fossil fuels to renewable energy for the sake of our children and grandchildren. We need to forward not backwards Thank you, Adelaide Fenton</p>	<p>Thank you for your comment.</p>

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BOEM-2022-0071-0075	The planned Sunrise Wind offshore wind project will bring jobs, training and economic benefits directly to union families and local communities.	Thank you for your comment.
BOEM-2022-0071-0076	Off shore wind farms will provide a huge boost to the upstate economy that is needed so much and provide a lot of good union jobs	Thank you for your comment.
BOEM-2022-0071-0078	The only way we are going to get the US to be self-reliant in regards to energys is via Offshore Winds. For now and the future, for my children, and their children, and their grandchildren. Please! For the love of God and life!	Thank you for your comment.
BOEM-2022-0071-0079	Dear Program Manager: I am writing to you today in support of the Sunrise Wind project. As America grows its offshore wind industry, we have the opportunity to shape the future of the energy market in the United States. Boskalis is a leading global dredging and offshore contractor and maritime services provider. We offer a unique combination of experts, vessels and activities. We have been operating globally for over 100 years, with a strong base in the US for the last 40 years. In addition to our traditional dredging activities we offer a broad range of maritime services for the offshore energy and renewables sectors. Boskalis positively contributes to climate change mitigation by helping to expand access to renewable power and by facilitating the energy transition by developing infrastructure to deliver affordable and clean energy. Our safety and those of our broader team is paramount. Boskalis operates its progressive global safety program No Injuries, No Accidents (NINA), which is held in high regard in the industry and by our clients. By leveraging our expertise in the renewables sector, we have the unique opportunity to help build the future of the energy industry. We are uniquely positioned to build the future of the green-energy industry in the US through the creation of job opportunities that will be sought after by those looking to build their American dream, create families, and purchase homes. We have the opportunity to create a green economy that will save our planet and deliver the next generation a cleaner environment and stronger future. It is a rare opportunity to get in on the ground floor of an economic revolution. This is our window to impact the future through the creation of new relationships, supply lines, and new markets. We are proud to be a part of this revolution. BOEM provided multiple alternatives for	Thank you for your comment.

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	<p>further review. Within those alternatives, there is one that BOEM should not consider – No Action. No Action could hinder further development of the U.S. offshore wind domestic supply chain. The supply chain needs clarity and confidence that projects can move forward, and in a timely manner. We need Sunrise Wind to be built. Sunrise Wind is good for the economy, environment, and our nation’s energy security. I urge you to approve this project on its current timeline and keep our industry working. Sincerely, Jared Dent Project Director Sunrise Wind</p>	
BOEM-2022-0071-0080	<p>Expanded offshore wind infrastructure is essential if our country is to meet its climate goals and protect its natural environment for years to come. Clean energy is the future and the federal government should be supporting clean energy projects in any and all ways that it’s able to. While potential environmental impacts of such structures are valid concerns, there are methods where the impacts of such structures can be reduced. This results in a situation where the environmental benefits vastly outweigh its disadvantages. As a New Yorker in a coastal community, I completely support this project.</p>	Thank you for your comment.
BOEM-2022-0071-0082	<p>I am resident of Stony Brook and I am in support of this program. We do have to ensure that this project gets completed on time and under/on budget. Offshore winds farm will provide clean, renewable power and will help us reach our decarbonization goals!</p>	Thank you for your comment.
BOEM-2022-0071-0084	<p>As a resident of Baiting Hollow in Suffolk County, NY I support offshore wind and the Sunrise Wind project. This project will help New York transition from fossil fuels to renewable energy and create many sustainable jobs. It will be located over 30 miles offshore and connect in Brookhaven to bring renewable energy directly to 600,000 Long Island homes. I support this project.</p>	Thank you for your comment.
BOEM-2022-0071-0085	<p>Dear Program Manager,  As a resident of Sagaponack and Mount Kisco, New York, I am writing to strongly urge the BOEM to approve the permit application for Sunrise Wind so that we can begin to realize the benefits of this regionally significant clean energy project as soon as</p>	Thank you for your comment.

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	<p>possible. We can't fight climate change without transitioning away from fossil fuels to renewable energy. Time is of the essence, and we have to do everything in our power to make this a cleaner and safer world for our children. And we must continue to support offshore wind for our national energy security. Thank you so much in advance for your time.</p>	
<p>BOEM-2022-0071-0086</p>	<p>Sunrise Wind coupled with the other four currently awarded offshore wind projects to be sited off Long Island offers significant opportunity for economic development and the creation of good-paying union and green-economy jobs. Long Island can become a hub for an offshore wind workforce that will be at the center of a major industry that both strengthens our economy and combats climate change. Sunrise Wind is critical to meeting New York State's clean energy mandate which requires 70% of New York's electricity generation come from renewable energy by 2030 and calls for the development of 9,000 megawatts of offshore wind energy by 2035. I urge BOEM to move the Sunrise Wind project forward.</p>	<p>Thank you for your comment.</p>
<p>BOEM-2022-0071-0087</p>	<p>Dear Program Manager, As America is shifting its focus to a sustainable long term energy source, so are we at LJUNGSTROM. We are a 100-year-old company that has its roots embedded deeply into the fossil fuel industry. LJUNGSTROM recently has planted a new seed, so to speak, into fabricating secondary steel for the Offshore Wind Energy markets. This new opportunity has not only transformed our business, but also the community around us, here in Wellsville, NY. This new market has enabled us to make some vast improvements to our factory. These improvements include a state-of-the-art climate-controlled coating facility, a Computer Numeric Controlled Structural cutting machine, and several other machines dedicated to delivering results in this Offshore Wind Energy market. This Offshore Wind market also has enabled us to hire over 75 new employees, over the last year, to help meet the demands of these new contracts. And this is just the start, as we are looking forward to hiring another significant number of new employees this year. These are exciting times for everyone in Wellsville! So, to say that LJUNGSTROM supports the Sunrise Wind project, is an understatement. We are a part of Sunrise Wind! Because of projects like Sunrise Wind, we can employ hundreds of great people and help them provide for their families and</p>	<p>Thank you for your comment.</p>

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	the community. Please keep this project moving forward, on-time, because our future needs to be greener, sooner rather than later!	
BOEM-2022-0071-0088	I totally support this project! We need more clean and renewable energy in the USA!	Thank you for your comment.
BOEM-2022-0071-0089	<p>I am writing in support of the Sunrise Wind Project. This is a positive step away from fossil fuels. It will help us achieve our NYS goals toward renewable energy. Personally, I think the modern windmills make a beautiful landscape element.</p> <p>The arguments against this project, noise, bird death, and disrupting the view from land are unfounded. I have actually walked in a windfarm (on land) and yes, there is noise when you are in the midst of the windmills. But, in the car parked on the road beside the farm, with the windows up it was quiet. A short walk from the farm, there was no noise. The farm in this instance is distant from land and, as I said above, I think it will add visual interest. Yes, there are some instances of bird death, but they are relatively few and there are way to manage and minimize the problem. I believe more birds die from being caught by cats at bird feeders; we have not yet prohibited either bird feeders or cats.</p>	Thank you for your comment.
BOEM-2022-0071-0090	As life long east end resident, I wholeheartedly support the Sunrise Wind project. Energy independence is a critical issue for eastern LI. Our kids and future depend on us taking the meaningful steps towards renewable non-fossil based energy. PEASE APPROVE THIS PROJECT!	Thank you for your comment.
BOEM-2022-0071-0091	<p>Offshore wind will reduce our reliance on fossil fuels and will provide family-supporting jobs and improve public health. New York has committed to 70% renewable energy by 2030 and 100% clean energy by 2040, including 9,000 megawatts of offshore wind by 2035. But we won't meet our goals if we only talk about clean energy. It must be turned into reality with real projects on the ground.</p> <p>Sunrise Wind is key to meeting these goals</p>	Thank you for your comment.
BOEM-2022-0071-	As a member and recent honoree of the New York League of Conservation Voters for	Thank you for your

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0093	our dedication to supporting the preservation of our environment, I would encourage you to support the development of the proposed wind farm offshore New York (aka Sunrise Wind). Being in the business of offering a total turnkey solution to providing EVSE charging infrastructure, and also being an owner/operator of several Long Island charging ports, we clearly recognize the need for available electrical energy in volume far beyond what we have utilized in the past. Further, the demand for electricity to support our charging station as well as hopefully thousand more in New York can only benefit from the availability of wind farm harnessed energy supported by appropriate and ample battery storage facilities. Without them, the costs of dispensed electricity as impacted by demand charges will stifle innovation and prevent businesses from being able to afford to transition to clean energy.	comment.
BOEM-2022-0071-0095	Make it happen, we need it! China is way ahead of us in renewable energy and we are the richest country in the world.	Thank you for your comment.
BOEM-2022-0071-0096	I support approval for the Sunrise Wind Farm construction. Offshore wind is essential for New York to achieve its atmospheric-carbon-reduction goals. The location of the wind farm takes into consideration the aesthetics of seashore beauty by siting the windmills far enough offshore.	Thank you for your comment.
BOEM-2022-0071-0098	We are in a crisis regarding both energy and climate change. We need to taper off using fossil fuels and go green	Thank you for your comment.
BOEM-2022-0071-0099	I think this is a good idea--one whose time has come. We need to reduce our use of fossil fuels, whether by uses of solar panels, solar wind farms, electric cars or heat pumps.	Thank you for your comment.
BOEM-2022-0071-0100	We need more offshore wind to hope to achieve our clean energy goals and create a healthier, more stable future for our children. As a resident of Yonkers, I write to urge BOEM to approve the permit application for Sunrise Wind so that we can begin to realize the benefits of this regionally significant clean energy project as soon as possible. We can't fight climate change without transitioning away from fossil fuels to renewable energy as a major investment supported by our State, and the nation.	Thank you for your comment.
BOEM-2022-0071-	Offshore wind will substantially aid out transition from fossil fuels to offshore wind as	Thank you for your



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0102	<p>our cleaner source of energy. The work that NYLCV is doing to support clean energy is going to have a material effect on the futures of all of us, without your efforts, our beautiful island could eventually become inhabitable.</p> <p>Keep up the good work.</p> <p>Ray LeCann,</p>	comment.
BOEM-2022-0071-0103	Our future as American's lies with creating sustainable clean energy sources such as wind turbines.	Thank you for your comment.
BOEM-2022-0071-0104	As a New Yorker, I support the Sunrise Wind project and associated wind power projects across our state's land and waters. Local, clean energy is the best way to keep New York's power grid safe amidst the growing climate crisis and the provocations of petro-states such as Russia. Sunrise Wind is an investment in the future of our state that will pay off immeasurably in the long run.	Thank you for your comment.
BOEM-2022-0071-0105	I support Sunrise Wind and the offshore wind projects that will help support our union jobs!	Thank you for your comment.
BOEM-2022-0071-0107	I am in full favor of the Sunrise Wind Farm Offshore New York.	Thank you for your comment.
BOEM-2022-0071-0108	<p>The Sunrise Wind project is vital to our community!</p> <p>As a mother, I believe this project is vital to our community! It will help New York transition from fossil fuels to renewable energy, save Long Islanders money and most importantly help reduce carbon emissions and work to protect the environment for our children. The Not-in-my-backyard argument doesn't make sense because it will be located over 30 miles offshore and it will bring renewable energy directly to 600,000 Long Island homes. I support this project because clean energy is important to our future!</p>	Thank you for your comment.
BOEM-2022-0071-	We need to invest in clean energy immediately!	Thank you for your

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0109		comment.
BOEM-2022-0071-0111	<p>Dear Program Manager: I am writing to you today in support of the Sunrise Wind project. Having been employed in the fishing industry for over a decade has shown me the bountiful resources that can be sustainably harvested from our oceans and wind energy will be no different. The wind projects, while I was at first skeptical of how it would impact the fishing industry, have proven to be a job multiplier for numerous individuals like myself. The growing employment opportunities created by projects like this one have provided outlets for individuals in a plethora of trades to transition into this rising job market. Also, it has been made apparent that projects utilizing Fisheries Liaison Officers have made every best effort available to minimize any potential impacts within the local fishing communities.</p> <p>BOEM provided multiple alternatives for further review. Within those alternatives, there is one that BOEM should not consider – No Action. No Action could hinder further development of the U.S. offshore wind domestic supply chain. The supply chain needs clarity and confidence that projects can move forward, and in a timely manner. We need Sunrise Wind to be built.</p> <p>Sunrise Wind is good for the economy, environment, and our nation’s energy security. I urge you to approve this project on its current timeline and keep our industry working. Sincerely,</p> <p>Fisheries Liaison Officer</p>	Thank you for your comment.
BOEM-2022-0071-0112	Writing in support of this wind project which will provide jobs and clean energy to New Yorkers!	Thank you for your comment.
BOEM-2022-0071-0113	Sunrise Wind - Offshore wind is indispensable to New York’s clean energy future and we encourage NYLCV members and everyone who cares about clean energy to speak up for offshore wind!	Thank you for your comment.

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	Offshore wind will reduce our reliance on fossil fuels and will provide family-supporting jobs and improve public health. New York has committed to 70% renewable energy by 2030 and 100% clean energy by 2040, including 9,000 megawatts of offshore wind by 2035. But we won't meet our goals if we only talk about clean energy. It must be turned into reality with real projects on the ground. Thank you	
BOEM-2022-0071-0114	I am writing to express my full support of this project.	Thank you for your comment.
BOEM-2022-0071-0118	To be brief, if the benefits out weigh the costs to birds, fish undersea habitats I am for it.	Thank you for your comment.
BOEM-2022-0071-0119	A sustainable New York needs clean energy. Let's invest in our State's clean energy future. Let's not rely on fossil fuels any longer than necessary. Long Islanders at ready to harness the wind's power and embrace a clean, sustainable future.	Thank you for your comment.
BOEM-2022-0071-0121	We have to start now to do something to help our environment and get away from oil forts too late.	Thank you for your comment.
BOEM-2022-0071-0122	Over the past 30 years, we have lost 50% of Earth's coral reefs. The scientific consensus indicates that the primary cause of this is climate change brought on by global warming. Wind power is undeniably a solution. Wind power, specifically offshore wind power, is one the most efficient sources of renewable energy production humans have ever created. As we begin to phase out of our dwindling supply of conventional & harmful fossil fuels, utility energy production needs to be powered by renewable sources. I encourage all permitting entities to help propel the USA to achieve this accomplishment.	Thank you for your comment.
BOEM-2022-0071-0123	I love the idea of offshore wind farms, assuming that due diligence is taken to ensure all environmental guidelines are followed and scientists are actively tracking the impacts of these farms in the short, medium and long term on ocean ecosystems.	Thank you for your comment.
BOEM-2022-0071-0124	Just Build it and stop "Pussy Footing" around. This is a needed project that will help relieve the nation of some economic and environmental woes!!!!	Thank you for your comment.
BOEM-2022-0071-	I am in strong support of renewable energy and offshore wind. Please allow the	Thank you for your

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0129	Sunrise Wind project to proceed!	comment.
BOEM-2022-0071-0130	I support expanding offshore wind projects	Thank you for your comment.
BOEM-2022-0071-0132	I live on eastern Long Island and have for 78 yrs. I think this offshore wind farm is a major asset for this area and any others it may service. I have sailed past oil derricks in the ocean and these windmill are a lot safer in many ways.	Thank you for your comment.
BOEM-2022-0071-0133	<p>Attention of US Bureau of Ocean Energy Management Re :Sunrise Wind Project for New York</p> <p>My name is Kevin Cawley, and I am the Director of the Thomas Berry Forum for Ecological Dialogue at Iona University in New Rochelle NY. I speak in favor of the Sunrise Wind offshore wind project. Offshore wind will reduce our reliance on fossil fuels and will provide family-supporting jobs and improve public health. New York has committed to 70% renewable energy by 2030 and 100% clean energy by 2040, including 9,000 megawatts of offshore wind by 2035. But we won't meet our goals if we only talk about clean energy. It must be turned into reality with real projects on the ground. Pope Francis has noted in Laudato Si, his encyclical letter on care for our common home: "There is an urgent need to develop policies so that, in the next few years, the emission of carbon dioxide and other highly polluting gases can be drastically reduced, for example, substituting for fossil fuels and developing sources of renewable energy." (LS 26) The United Nations Intergovernmental Panel on Climate Change says that avoiding catastrophic climate change requires keeping global average temperatures within 1.5 Celsius degrees above pre-industrial levels. We need to switch to renewable sources for electricity now to avoid this temperature rise. The connectivity question must also be addressed. To get all this electricity from where it will be generated to where it is used, we also need a massive expansion of transmission—a tripling or quadrupling in capacity under some scenarios. Several studies conclude that achieving the need- ed level of wind and solar requires building on the order of 100 gigawatts a year out to 2050. To put this in perspective, one good-</p>	Thank you for your comment.

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	<p>sized nuclear power plant, or a very large wind farm, has a capacity of about 1 gigawatt. So, we would have to build the equivalent of around 100 similar projects every year to meet the energy needs we know will be upon us. The clock is ticking.</p> <p>Again, Pope Francis reminds us: “Results take time and demand immediate outlays which may not produce tangible effects within any one government’s term. That is why, in the absence of pressure from the public and from civic institutions, political authorities will always be reluctant to intervene, all the more when urgent needs must be met. To take up these responsibilities and the costs they entail, politicians will inevitably clash with the mindset of short-term gain and results which dominates present-day economics and politics. But if they are courageous, they will attest to their God-given dignity and leave behind a testimony of selfless responsibility. “ (LS 181)</p> <p>I urge the Bureau of Ocean Energy Management to support the Sunrise Wind project and do everything in its power to expedite the rapid completion of this essential infrastructure.</p> <p>Br. Kevin Cawley, Thomas Berry Forum at Iona University, February 14, 2023</p>	
BOEM-2022-0071-0134	I support the wind project to help New York get off fossil fuels and use natural resources to generate power. By carefully locating wind farms offshore where it won't be disruptive visually or otherwise, it is a win/win for all New Yorkers and world citizens!	Thank you for your comment.
BOEM-2022-0071-0135	Any moves toward renewable energy in all forms should be lauded and encouraged. After reading about wind farming, I can't seem to find a credible adverse effect when implemented correctly. It seems like a no-brainer. As a native East Ender, I enthusiastically support this initiative and can't wait to see it come to fruition. Let's go!	Thank you for your comment.
BOEM-2022-0071-0136	What happens to the wind turbines when there life expectancy is done?	Thank you for your comment.

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BOEM-2022-0071-0137	Offshore wind w'll greatly reduce our dependence on fossil fuels. I support Sunrise Wind project off Long Island.	Thank you for your comment.
BOEM-2022-0071-0138	Dear Program Manager: I am writing to you today in support of the Sunrise Wind project. As the US grows its offshore wind industry, we can shape the future of the energy market in the United States. Riggs Distler & Company, Inc. has grown over the past century into one of the largest union utility, mechanical, and electrical contractors in the United States. With talented leadership and mentoring at all levels, we promote a safe, exciting, and challenging work environment. Our philosophy is to empower employees to grow and evolve with our business—all with union support. We are proud of our strong connection and reputation with local suppliers to provide economic opportunities for surrounding area businesses as we continue to build the local supply chain needed to support the offshore wind industry as general contractor in multiple states in the Northeast. This project is a chance to make a lasting impact through the creation of new relationships, supply lines, and markets to build reliable and innovative infrastructure to support and empower future generations. Sunrise Wind is good for the economy, environment, and our nation's energy security. I urge you to approve this project on its current timeline and keep our industry working. Sincerely, Stephen M. Zemaitatis Jr. President & CEO Riggs Distler & Company, Inc.	Thank you for your comment.
BOEM-2022-0071-0140	Full speed ahead with offshore wind in the USA, especially in the New York bite. Site onshore facilities in a variety of states to share job growth- but make the system cohesive. Coordinate permitting and fast track them. Aggregate Environmental Impact reviews so that other projects can use the same data. Make it easier for more US companies to get into the offshore wind game. It is pathetic that we have ceded this fantastic industry to European majors.	Thank you for your comment.
BOEM-2022-0071-0142	Dear Ms. Baker: On behalf of The International Brotherhood of Electrical Workers, Third District, I am writing in support of Proposed Action-Alternative B of the DEIS on Sunrise Wind's COP. Nationally, the IBEW represents 775,000 active members and retirees who work in a wide range of fields, including utilities, construction, telecommunications, broadcasting, manufacturing, railroads, and government. These	Thank you for your comment.

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	<p>members include approximately 55,000 workers in New York State. We stand with President Biden’s Executive Order 14008 and New York State in its commitment to renewable and clean energy sources, such as offshore wind. We are committed to collaborating closely with partners across all levels of government, and the private sector, to achieve the President’s and Governor Hochul’s clean energy goals. We are committed to ensuring that sustainable energy projects occurring within the United States are designed and built to minimize their impact on the environment, with safety as a top priority, and to support IBEW members with safe, family-sustaining jobs. Sunrise Wind is a joint venture between Orsted, the world’s most sustainable energy company, and a global leader in offshore wind energy, and Eversource, New England’s largest and premier energy delivery company to provide more than 1000 megawatts of clean, renewable energy to New York State. The Sunrise Wind project will provide a significant contribution to the Federal and State goals of clean energy by providing the energy to power more than 600,000 homes. In addition to the critical clean energy, Orsted and Eversource have committed to utilizing union workers to construct the project. The hundreds of union jobs will provide upward mobility for working class residents of New York. The project will also encourage the development of the U.S. based supply chain for offshore wind which will lead to tens of thousands of good paying, family sustaining jobs. The IBEW has been working with both Orsted and Eversource over the last several years to better understand the offshore wind industry’s needs and the ensuing workforce required for these critically important projects. These companies have clearly demonstrated their commitment to workers, and we believe this concern will translate well for environmental impact during the construction, operations and eventual decommissioning of their projects. The IBEW encourages BOEM to approve Proposed Action - Alternative B without undue delay.</p>	
BOEM-2022-0071-0143	I support the Sunrise Wind project! Offshore wind will reduce our reliance on fossil fuels and will provide family-supporting jobs and improve public health. It seems like a no-brainer to move ahead.	Thank you for your comment.
BOEM-2022-0071-0144	I am 100 per cent in favor of wind energy. As a sailor, I know that Sunrise Wind is well located to take advantage of southwesterly summer thermals rising over Long Island.	Thank you for your comment.

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	Actually, for the benefit of the planet, and all life as we know it; we MUST wean ourselves off of fossil fuels as soon as possible. Sunrise wind is well positioned to help with this effort.	
BOEM-2022-0071-0146	I am in support of Sunrise Wind’s proposal for an offshore wind farm in New York. We must replace dirty sources of power asap. The warming of our planet must be controlled, and offshore wind installations are a necessity to reaching this goal.	Thank you for your comment.
BOEM-2022-0071-0149	I support this project to build clean energy infrastructure in New York. Our state can be a climate leader.	Thank you for your comment.
BOEM-2022-0071-0150	I fully support the proposed wind farm, which will reduce our reliance on fossil fuel, provide jobs, and supply Long Islanders with energy. Please allow this project to go forward. We must do all we can to protect present and future generations from the devastating effects of climate change	Thank you for your comment.
BOEM-2022-0071-0151	My husband and I live on the North Fork of Long Island, NY, and are supporters of the offshore wind project. There are many reasons to positively consider the offshore project, but the first and most important reason is that our number one asset, the water that surrounds this island, is a resource that can help us transition to a greener power system and we have to start somewhere. Hansen and other scientists have said that 2035 is a dangerous turning point, so let’s get at least something productive under way. We’ve talked enough.	Thank you for your comment.
BOEM-2022-0071-0152	Dear Program Manager: I write to express support for the Sunrise Wind project. The Haugland companies have been building state-of-the-art transmission infrastructure for over 20 years. We’ve worked on a great number complex, interesting projects throughout our history, but it would be difficult to find a project more interesting than the work to support the U.S. offshore wind industry, including Sunrise Wind. We have had the opportunity to build the onshore infrastructure for South Fork Wind, which will be complete and operational this year. We will also be working to support the construction of Sunrise Wind, a vastly larger and more complex project. We appreciate BOEM’s careful consideration of the Sunrise Wind project and understand that BOEM provided six alternatives for further review. Within those six alternatives, there is one	Thank you for your comment.



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	<p>that BOEM should not consider - No Action. Without action, New York will not realize Sunrise Wind’s tremendous potential to create jobs and grow the supply chain. Sunrise Wind is good for New York’s economy and the region’s environment. We at Haugland Energy urge you to approve this project and keep our state’s momentum going.</p>	
<p>BOEM-2022-0071-0155</p>	<p>Dear Program Manager: I am writing to you today in support of the Sunrise Wind project. As America grows its offshore wind industry, we have the opportunity to shape the future of the energy market in the United States. Ordtek is an independent UXO Risk Management consultancy providing unparalleled expertise and guidance across the energy and construction sector. Established in 2012, acquired by Venterra in 2022 and headquartered in Norfolk, Ordtek has provided support to projects all over the world. Recent projects have been situated in Western and Northern Europe, to the USA and across several countries in the APAC region. We have the opportunity to build the future of the energy industry in America, and we are uniquely positioned to build the future of the green-energy industry in the US through the creation of lucrative job opportunities, that will be sought after by those looking to build their American dream, create families, and purchase homes. We can create a green economy that will save our planet and deliver the next generation a cleaner environment and stronger future. It is a rare opportunity to get in on the ground floor of an economic revolution. This is our window to impact the future through the creation of new relationships, supply lines, and new markets. We are proud to be a part of this revolution. BOEM provided multiple alternatives for further review. Within those alternatives, there is one that BOEM should not consider – No Action. No Action could hinder further development of the U.S. offshore wind domestic supply chain. The supply chain needs clarity and confidence that projects can move forward, and in a timely manner. We need Sunrise Wind to be built. Sunrise Wind is good for the economy, environment, and the nation’s energy security. I urge you to approve this project on its current timeline and keep our industry working. Sincerely, Lee Gooderham Director</p>	<p>Thank you for your comment.</p>
<p>BOEM-2022-0071-0159</p>	<p>As a member of the New York State carpenters local to 91 I totally support offshore wind energy that would power up to 6000 homes in the state. Please support this.</p>	<p>Thank you for your comment.</p>

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BOEM-2022-0071-0165	Renewable resources are the future. There is a ticking time bomb we are still embracing that is our current dependence on fossil fuels. Renewable resources such as wind, solar, geothermal and biofuels are the only practical future for our planet, further dependence on fossil fuels will ensure there will be no future.	Thank you for your comment.
BOEM-2022-0071-0166	<p>BOEM DEIS Hearing-Testimony Suggestions • Sunrise Wind coupled with four other currently awarded offshore wind projects to be sited off Long Island’s shores offers significant opportunities for economic development and the creation of good-paying union jobs. Long Island can become the hub for an offshore wind workforce that will be at the center of a major industry that both strengthens our economy and fights climate change. I urge BOEM to allow the permitting process to move forward by approving Sunrise Wind’s Draft Environmental Impact Statement.</p> <ul style="list-style-type: none"> <li>• Construction of the Sunrise Wind project will be performed under a Project Labor Agreement and create more than 800 direct jobs and over 1200 indirect jobs in New York. Creating union jobs will boost our local economies and provide opportunities for the next generation of workers through apprenticeship training. I urge BOEM to permit this project and put our men and women in the building trades to work.</li> <li>• As a union member, I support offshore wind. Large scale utility development like Sunrise Wind and other offshore wind projects will not only reduce our carbon footprint but will also mean a tremendous amount of economic opportunity in the form of jobs and economic benefits. I strongly believe that Americans should not have to choose between a good job and a clean environment – we can and must have both. Orsted and Eversource’s Sunrise Wind project is an opportunity to not only drive the nation’s clean energy future, but create quality, family sustaining jobs at the same time. I urge BOEM to move forward with BOEM’s permitting process.</li> <li>• Sunrise Wind coupled with the other four currently awarded offshore wind projects to be sited off Long Island offers significant opportunity for economic development and the creation of good-paying union and green-economy jobs. Long Island can</li> </ul>	Thank you for your comment.

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	<p>become a hub for an offshore wind workforce that will be at the center of a major industry that both strengthens our economy and combats climate change. Sunrise Wind is critical to meeting New York State’s clean energy mandate which requires 70% of New York’s electricity generation come from renewable energy by 2030 and calls for the development of 9,000 megawatts of offshore wind energy by 2035. I urge BOEM to move the Sunrise Wind project forward.</p> <ul style="list-style-type: none"> <li>• Offshore wind is urgently needed in the U.S. There is a huge coastal electricity demand and there is a world class resource on a large buildable continental shelf off the Northeast coast. Sunrise Wind is an important project for the nation’s offshore wind industry. The comprehensive Draft Environmental Impact Statement outlines this in great detail. This project has gained deep and diverse stakeholder support among local, environmental and labor organizations on Long Island as it has delivered on its economic commitments over the past several years .There was no opposition to the certification conditions for Sunrise Wind’s transmission line which was drafted during the Article VII siting process by the New York State Public Service Commission. With such broad community support, I urge BOEM to move the Sunrise Wind project forward.</li> </ul>	
BOEM-2022-0071-0169	<p>Dear Program Manager: I strongly support approval of the DEIS for Sunrise Wind’s Construction and Operations Plan, Alternative B - Proposed Action. The IBEW's members and leadership in New York and in our 3rd District have been deeply involved in supporting the offshore wind industry over the last several years and are preparing our already well trained workers with skills necessary to work in the offshore industry. We anticipate hundreds of high paying, quality jobs in the offshore industry with partners such as Orsted and Eversource. These companies have committed to safety and environmental responsibility and have demonstrated their commitment in those critical areas very well to date. As noted in the DEIS, Alternative C-1 could be a viable option to reduce certain fish habitat impact from moderate to minor but it is unclear upon my review what the commercial viability of such change would be on the project. Please move forward with the approval of Alternative B - Proposed Action without</p>	Thank you for your comment.

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	delay.	
BOEM-2022-0071-0171	<p>Program Manager: I write on behalf of the 10,000 members of Local 1102 RWDSU/UFCW. Many of our union members and their families live on Long Island and in the Tri-State area. As a diverse union, we know that a forward-looking economy is the best way to empower working people. The Sunrise Offshore Wind Project is exactly the type of development that our members are seeking. Firstly, Local 1102 members support efforts to use the renewable resources at our fingertips to reduce our reliance on fossil fuels. After seeing the devastating effects of climate change with weather events such as Superstorm Sandy, our members and their families are ready to power the transition to a green economy. As a region and as a nation we should strive to lead on these technologies and systems to initiate a clean energy revolution. It is the right choice both economically and environmentally. The Sunrise Wind Project, led by the Orsted and Eversource joint venture, is a huge step in the right direction. Moreover, this project brings indirect opportunities beyond the clean energy jobs alone. With a new industry to meet New York State’s 70% clean energy by 2030 goal, thousands of jobs will be needed to service, feed, and clothe the workers making the Sunrise Wind Project operational. With labor-management already cooperating, the Orsted/Eversource venture will boost local economies for generations to come with good, union jobs. We must take action to reshape our economy and energy system in the fight against climate change. The Sunrise Offshore Wind Project is a perfect step forward and Local 1102 proudly stands with this project’s diverse stakeholder group. We strongly urge BOEM to move forward with Sunrise Wind’s permitting process.</p> <p>Sincerely, Alvin Ramnarain President</p>	Thank you for your comment.
BOEM-2022-0071-0177	Living on Long Island is costly. Please consider this when setting working standards for local projects that are publicly funded thank you.	Thank you for your comment.
BOEM-2022-0071-0184	It’s good for the planet, labor, jobs, economy. Please allow it to go through	Thank you for your comment.
BOEM-2022-0071-	As a member of local 25 IBEW I’m in full support of this very important project. the	Thank you for your

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0186	changes that the world is undergoing is far reaching and every one of us has to decide what is best not just for ourselves but our families, communities and the environments inwhich we live in. We have to give our children a advantage to succeed and achieve far more than we have and we do this by supporting projects like the sunrise wind farm. This will provide us the oppportunity to come together as a strong union to do our part in providing clean energy for a better tomorrow. thank you.	comment.
BOEM-2022-0071-0187	I would like to express my full support for the Sunrise Wind offshore wind project. This project is a big step toward a cleaner future for my children . Thank you!	Thank you for your comment.
BOEM-2022-0071-0188	I am a Local 25 I B E W electrician that lives on Long Island , New York I fully support this Sunrise offshore wind project off the shores off Long Island These are jobs that are much needed to sustain living here on the island. Not to mention that it is clean , safe and renewable source of electricity that will last for years with no carbon emissions Tommy S	Thank you for your comment.
BOEM-2022-0071-0196	I am in support of the Sunrise Wind project and think that it is long overdue. The amount of energy that can be produced cleanly is vital to the future for Long Island.	Thank you for your comment.
BOEM-2022-0071-0200	On behalf of 620 Sierra Club members and supporters in NY, I am attaching the following comment submissions. The Sierra Club is strongly supportive of this project.  "We need offshore wind to meet New York's climate mandate and stop climate change from worsening. As a New Yorker, I support responsible projects like the proposed Sunrise Wind farm. Sunrise Wind will be built with New York union labor. It will deliver power to one of the key load centers of the state, Long Island, and help to displace gas power from one of the dirtiest parts of New York's grid. We need offshore wind to replace fracked gas; without it, we cannot hope to protect our sensitive marine environment, our communities, and our future. Please approve the Construction & Operations Plan for this project."	Thank you for your comment.
BOEM-2022-0071-0206	Dear Program Manager: We write to you on behalf of the members of the Business Network for Offshore Wind (the Network) to provide comments on the Sunrise Wind Draft Environmental Impact Statement [BOEM-2022-0071] published in the December	Thank you for your comment.

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	<p>16, 2022 Federal Register. The Network is the largest nonprofit organization solely focused on the development of the offshore wind industry and its supply chain. Since 2013, the Network has brought together business and government, both domestically and internationally, to educate and to prepare companies and small businesses to enter the offshore wind market. The Network uses the voice of its members to educate and support federal, state, and local policies to advance the development of the U.S. offshore wind industry. The Network empowers its members with the education, tools, and connections necessary to participate in this booming industry. The Network commends BOEM on its decade of work bringing the Sunrise Wind project forward and recent advancement of a Draft Environmental Impact Statement as proof of the Biden-Harris Administration’s clear interest in advancing the U.S. offshore wind industry. Development of the Sunrise Wind project will make important contributions towards national and state offshore wind goals and the establishment of a local supply chain. Advancement of this project is in the declared public interests of the United States and the state of New York. Presidential Executive Order No. 14008, issued on January 27, 2021, states it is the policy of the United States to combat the climate crisis, reduce climate pollution in every sector of the economy, and spur well-paying jobs and economic growth especially through the development of clean energy technologies and infrastructure. Furthermore, the executive order specifically calls on the Secretary of the Interior to review permitting processes in offshore waters to increase renewable energy production in those waters, with the goal increasing offshore wind power in the United States to 30 GW and creating good jobs. The project is designed to contribute to New York’s offshore wind energy goal. The Sunrise Wind farm is expected to begin construction soon after BOEM’s approval and can begin providing necessary renewable energy to New York. Sunrise Wind is expected to begin commercial operations in late 2025 with a total capacity of up to 1,034 megawatts (MW). Sunrise Wind’s annual production will be enough to power approximately 600,000 average New York homes. In addition, Sunrise Wind can play a key role in helping New York meet the state’s goals outlined in the 2019 Climate Leadership and Community Projection Act. The project represents a significant step towards meeting</p>	

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	<p>the state’s goal of 70% of the state’s electricity generated from renewable sources by 2030. Moreover, Sunrise Wind will fulfill 11% of New York’s overall offshore wind goal of 9,000 MW by 2035. By moving forward with the approval of the Sunrise Wind and completing the draft environmental impact statement BOEM is driving New York’s offshore wind program one step closer to having steel in the water and helping the state meet its clean energy goals. The Network supports BOEM’s deliberate consideration and commitment to environmental protection. The Network encourages BOEM to continue moving the Sunrise Wind project forward with the recognition of the enormous environmental and economic benefits the project offers, especially compared to a “No Action” alternative. Net reductions in air pollutant emissions resulting from the Proposed Action are expected to contribute to long term benefits for communities by displacing emissions from fossil fuel generated power plants. Sunrise Wind project as proposed would result in annual avoided emissions in NOx (1,474 tons), SO2 (1,534 tons), VOCs (106 tons), PM2.5 (471 tons), and CO2 (2,592,802 tons) (COP p 4-141) I. Sunrise Wind’s Impact on the U.S. Supply Chain The Biden Administration has taken significant actions to bring transparency and predictability to the offshore wind leasing and permitting process, including the full federal permitting approval of Vineyard Wind and the issuance of the Record of Decision for South Fork Wind. BOEM and the Department of Interior are already taking steps to build that long-term pipeline by releasing a longer-term leasing plan Path Forward 2021-2025 for offshore wind leasing in U.S. waters. Just last week, the Department of Interior announced new proposed regulations that would modernize offshore wind processes in order to decrease costs and market uncertainty. In the face of growing global demand, sending clear market signals to attract investment to the U.S. is critical to ensuring U.S. offshore wind deployment goals are met. The Demand for a Domestic Offshore Wind Energy Supply Chain, a report published by NREL, studied the capacity to fulfill the administration’s deployment goal of 30 GW by 2030 and found “additional facilities will be required to achieve a fully domestic offshore wind supply chain.”i This fact takes on increasing importance as the report notes it is “unlikely that international suppliers will have sufficient throughput to support the construction of both European</p>	

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	<p>and U.S. offshore wind energy projects.” Accordingly, if the U.S. does not develop a robust domestic offshore wind supply chain, surging global demand for offshore wind project components, services, and raw materials could prevent the U.S. from reaching state and federal offshore wind deployment targets. A follow-up report released earlier in 2023 found that the U.S. market would require \$6 billion in new investments in factories, ports, vessels, etc., to ensure the nation matches its 30. GW buildout. And up to \$22.4 billion to build out a sustainable domestic supply chain Encouragingly, actions by the Department of Interior are already driving substantial investment decisions. The Network closely tracks the market and found that public and private investors committed \$2.2 billion in new funding in 2021, including commitments to develop nine major component facilities that will manufacture the foundations, towers, cables and blades of offshore wind turbines. In 2022, the market generated \$5.44 billion in new lease revenues for the U.S. government, reflecting an increased investor confidence in the U.S. market which will be crucial to a full build-out of the U.S. industry. Advancing Sunrise Wind is crucial to maintaining this momentum. The global offshore wind industry is growing exponentially, which will further strain global supply chains. In 2021, market analysts predicted global offshore wind capacity would reach 270 GW by 2030, in line with Network calculations of 254 GW by 2030. With only 57.2 GW installed by the end of 2021 (after 30 years of offshore wind development) the global market was facing a steep installation curve in order to reach established targets. Many nations have accelerated their timelines often in response to the Russian invasion of Ukraine. Denmark, Belgium, the Netherlands and Germany agreed to increase their offshore wind capacity “fourfold” by 2030 – equating to 50 GW of new capacity in nations with only 15 GW currently installed. British Prime Minister Boris Johnson called for increasing his nation’s targets to 50 GW by 2030, a 25% increase over current targets. According to Renewable UK, the global pipeline of offshore wind demand doubled in a year. Actions that delay project timelines must be avoided to the greatest extent possible. Project investments are ongoing and demand for materials, skilled labor, and critical equipment is dependent upon timely implementation. The Network urges BOEM to advance the Sunrise Wind project on its</p>	



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	<p>timeline. Direct Benefits to New York and the U.S. Supply Chain In building out offshore wind in the U.S., Sunrise Wind project developer Orsted has invested \$2 billion into the U.S. economy and has a supply chain touching upon 41 states. (See <a href="https://us.orsted.com/our-impact/supply-chain">https://us.orsted.com/our-impact/supply-chain</a>) The proposed project is already directly contributing to the formation of a U.S. supply chain, and major investments are dependent on its advancement. The port investment alone will have substantial impacts on redevelopment efforts in two different regions in New York as well as in the State of Connecticut. Construction and operation of Sunrise Wind will create more than 800 direct jobs and over 1200 indirect jobs in New York. Construction and operation of Sunrise Wind will result in direct investment of more than \$400M in New York state. To bolster their commitment to the project, Sunrise Wind is providing \$10 million to launch a national offshore wind training center at Suffolk Community College and \$5 million for a research and development partnership with Stony Brook University. As part of the project a steel fabricator in Western New York will fabricating anode cages to create at least 100 jobs.. The anodes will be assembled with foundation components in the Capital Region, seeding a supply chain that can continue to serve additional offshore wind project creating 230 jobs at Port of Coeymans.</p> <p>Orsted/Eversource is creating an operations and maintenance (O&amp;M) hub at Port Jefferson that will be the home port of a Service Operation Vessel that will support maintenance and operation of the developers’ portfolio of projects in the northeast. Because of the size of this project, in addition to the two ports mentioned above, Orsted/Eversource and the federal government are investing \$255 million into the Port of New London<sup>1</sup> to develop it as a staging and assembly port and a \$90 million investment at the Port of Davisville-Quonset to be used for operations and maintenance. The Sunrise Wind project is also supporting the building of the first US-built service operations vessel (SOV) and 5 crew transfer vessels; the SOV will be built by Edison Chouest’s shipyards in Louisiana, Mississippi and Florida, and supplies for the vessel will be sourced in 12 states. In addition, the company has entered into a charter agreement to use the first Jones Act qualified wind turbine installation vessel, the Charybdis, a \$550 million vessel being constructed in Brownsville, Texas. Additionally,</p>	

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	<p>the New York workforce and more broadly domestic workers will gain entry into the offshore wind workforce and receive invaluable experience to be applied in future projects. II. Comments on the Proposed Alternatives The Network begins by commending BOEM for recognizing the importance of state public policy by maintaining a commitment to achieve up to 1,034 MW with 94 WTG, delivering clean power to New York. While the Network appreciates environmental and fishing deconflicting considerations undertaken during the process including impacts to complex fish habitats, it is clear that pursuing either Alternative C1 or C2 do not offer significant benefits over Alternative B and could lead to unneeded project delays as shown in the analysis. The DEIS notes the fishing activity in the Lease Area accounts for a very small percentage (0.16 percent) of the total revenue across all fisheries covered by a Fishery Management Plan in the Mid-Atlantic and New England region. The DEIS notes that 75% of commercial vessels fishing the lease area derived less than 1% of their total annual revenue from the lease area, an incredibly low number. (DEIS 3-412). This is demonstrated by the fact that there is no change in impact to commercial and for-hire recreational fisheries when comparing the proposed Action to the two alternatives C-1 and C-2. (ES-xi). We emphasize the importance of maximizing the capacity to deliver energy from the project in order to achieve present and future commitments while reducing costs, amplifying community benefits and safeguarding the environment. Furthermore, the Network encourages BOEM to think about holistic economic and environmental impacts when considering alternatives. The Network recommends that BOEM implement the goals of Alternative B, while recognizing, based on the valuable input that BOEM has received during the process, there may be ways to improve upon the project while ensuring the timeline continues to move forward without delay. IV. Conclusion The Business Network for Offshore Wind and its members strongly encourage BOEM to maximize the ability of the lease area to generate and transmit as much electricity as possible to support the national and state of New York goals for renewable energy delivered to the grid. According to the Biden Administration, “More opportunities are ahead, including an estimated \$109 billion revenue opportunity across the offshore wind supply chain this decade, and East Coast</p>	

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	<p>Governors are laying the groundwork to seize them. Having already set commitments to procure nearly 40 GW of offshore wind, these states are providing a strong demand signal for clean energy that will lower energy costs for American families while protecting them from volatile fossil fuel price spikes.” Equally important, the Network urges BOEM to focus on avoiding delay in project implementation that could threaten already challenged supply lines and postpone needed employment. These employment opportunities will directly benefit the residents in the region in which the project is proposed. BOEM noted that “there will be notable and measurable benefits to employment, economic output, infrastructure improvements, and community services, especially job training, because of offshore wind development.” The air quality and other environmental benefits resulting from expanding renewable energy resources cannot wait. The impacts of Sunrise Wind’s current design are materially no different than the alternatives analyzed in the DEIS. The Network strongly recommends moving forward with the proposed action in the DEIS and approval of Sunrise Wind’s COP. Very truly yours, /s/ Ross Gould Ross Gould Vice President of Supply Chain Development Business Network for Offshore Wind</p>	
<p>BOEM-2022-0071-0207</p>	<p>Brothers and Sisters,</p> <p>As union families, we strongly believe in solving today’s environmental challenges in ways that both create and maintain quality jobs to build a stronger, fairer economy.</p> <p>The planned Sunrise Wind offshore wind project will bring jobs, training and economic benefits directly to union families and local communities.</p> <p>But your assistance is needed today to help the process advance through permitting process.</p> <p>After years of careful planning, community outreach, and extensive studies, the Draft Environmental Impact Statement for the Sunrise Wind project has been released for public comment. This is major milestone in the overall permitting process. Now,</p>	<p>Thank you for your comment.</p>

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	<p>people across the U.S. can submit comments on the DEIS, calling on the Bureau of Ocean Energy Management (BOEM) to keep offshore wind projects on track, without delay.</p> <p>But we need to amplify labor’s voice and let BOEM know how important the project is in delivering union jobs.</p> <p>We encourage all members to make their voices heard, as offshore wind has the potential to stimulate local economies throughout New York – and more regulatory hurdles from BOEM would put delivering those union jobs at risk!</p> <p>BOEM is now accepting comments from the public until February 14, 2023 and we need your help to speak out!</p> <p>We’d ask that you take a minute of your time today to easily submit comments online in support of the project – encouraging BOEM to move the permitting process forward and unlocking the economic and jobs potential of the U.S. offshore wind industry.</p> <p><b>ONLINE WRITTEN COMMENTS</b></p> <p>First, copy one of these four messages: (right click on a computer or hold your finger down on a smartphone)</p> <p>As a member of the NYS Carpenters Union, I write in support of Sunrise Wind. Offshore wind projects are critical to solving today’s environmental challenges in ways that both create and maintain quality jobs to build a stronger, fairer economy.</p> <p>Sunrise Wind alone is investing hundreds of millions of dollars in New York that will create hundreds of union jobs around the state. And once complete, the project will power more than 600,000 homes annually with clean energy.</p>	

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	<p>Orsted and Eversource, the project developers, have signed a Project Labor Agreement with the North American Building Trades and Local Building Trades Councils to ensure their projects will be built with local union labor. This important agreement gives us confidence that Sunrise Wind will be constructed under fair and equitable terms for members of our union family.</p>	
<p>BOEM-2022-0071-0209</p>	<p>As Executive Director of Renewable Energy Long Island (a 501-c-3 organization) and resident of Long Island, I support responsibly developed offshore wind projects in general, and, in this case, the Sunrise Wind project. This project will help New York transition from fossil fuels to renewable energy and create hundreds of jobs throughout its design, construction and operating lifetime. It will be located over 30 miles offshore, interconnect to the Long Island electric grid in Brookhaven township, and inject electricity generated from an abundant and renewable energy source directly to 600,000 homes in the region. Unfortunately, we now have just a small window of time left to address the global climate crisis. We need to deploy climate solutions which are commensurate in scale to the magnitude of the problem, and we need to bring these solutions to bear within a decade or so. Building offshore wind farms and building the industry that supports such infrastructure is one solution which will help us to reach the required scale and speed of deployment. I thank BOEM for its diligent work on offshore wind power and specifically on this Sunrise Wind project, and urge you to move forward as expeditiously as possible to ensure that our region, the State of New York, and the country will be able to harness our offshore wind resource and the environmental and economic benefits that come with it.</p>	<p>Thank you for your comment.</p>
<p>BOEM-2022-0071-0213</p>	<p>To whom this may concern. I am in support of the wind energy projects off shore. Being in New York we should always be ahead in providing energy solutions today for tomorrows problems. I have been to other states that have them on land and they are not an eyesore so to have them so far off shore where they will never be seen should not even be a discussion. If I could I would put one on my own property. Renewable energy can only be a good thing. Thank you and God bless America!</p>	<p>Thank you for your comment.</p>

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BOEM-2022-0071-0214	I support the Sunrise Wind Project. This will help the environment with clean energy production. Please approve this project. Thank you.	Thank you for your comment.
BOEM-2022-0071-0215	As A Proud Union Member, Born On Long Island, I Am Exited And Eager To Make Great Strides In Going Green, And Making Cleaner Reusable Energy. This Will Only Be A Win Win For The Environment, Working Families, And The Outlook Of The Future Of Our World. I Encourage BOEM To Help In This Incredible Endeavor, To Make Our World A Better Place For All Humankind. God Bless!!	Thank you for your comment.
BOEM-2022-0071-0216	I believe it is important to explore all aspects of clean, renewable energy resources, including the costs to mine the energy. Aesthetics/ locations/ documented impact on wildlife (positive and negative) are significant as well, and I believe should be part of the broad picture when considering any energy resource.	Thank you for your comment.
BOEM-2022-0071-0218	We need more wire like this to get us off fossil fuels.	Thank you for your comment.
BOEM-2022-0071-0223	As a member of the Long Island Federation of Labor, I am writing to encourage this project to go through. We need clean energy on Long Island. We have lagged behind in progress for many years. This project will bring much needed jobs and technology to the union workers of Long Island. In order to grow and keep pace with an economy, we must have the jobs to do so. Marie Boyle, RN, BSN NYSNA BOARD OF DIRECTORS EXECUTIVE COUNCIL LONG ISLAND FEDERATION OF LABOR	Thank you for your comment.
BOEM-2022-0071-0227	SLR Consulting US LLC (SLR) is pleased to submit the following comments on the Draft Environmental Impact Statement (DEIS) for the Sunrise Wind Project (SWP) Construction and Operations Plan (COP). SLR is an international environmental and advisory services consultancy with over 430 employees in 34 offices throughout the US, including many in the Northeastern US where the subject project will be located. Throughout our almost 30-year history, SLR has conducted numerous expert environmental studies and analyses for both the renewable power and fossil fuel power industries in the US and globally. These documents have supported the lead environmental review agencies in conducting the necessary careful review of the environmental impacts of these onshore and offshore energy projects. Some of the	Thank you for your comment.

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	<p>energy projects we have supported have been under review of the Bureau of Ocean Energy Management. This offshore wind project jointly developed by Ørsted and Eversource will be the first to connect in New York and is a critical component of the State’s plan to meet its 100% renewable energy goals. New York State has established one of the more aggressive renewable power generation goals in the US, and a significant portion of this goal is planned to be met with thoughtfully designed offshore wind projects such as the SWP. Also, the US recently rejoined the Paris Climate Accord, signaling a renewed focus by the current Administration on reducing our economy’s carbon footprint. The Power Sector will undoubtedly play an important part in that effort. As we witnessed in Europe in SLR’s beginnings there, the development of a domestic support network skilled in offshore wind development will accelerate as projects such as SWP are approved. We see the SWP as an important early step in this regard. The thoughtful design, construction and operation of offshore wind power facilities can ensure that environmental impacts be minimized. BOEM’s DEIS is providing a thorough review of the environmental impacts of the construction and operation plan for the project. This review will ensure that the public’s interest in environmental protection is served while also allowing renewable power to thrive and grow and help the US achieve its carbon reduction goals in a cost-effective manner. SLR Consulting US LLC slrconsulting.com We appreciate the opportunity to provide these comments on the SWP COP DEIS. Sincerely, SLR Consulting US LLC</p>	
BOEM-2022-0071-0233	As a member of local 25 I am in support of Sunrise Wind solar project. William w Czaikowski	Thank you for your comment.
BOEM-2022-0071-0235	I support all green energy projects.	Thank you for your comment.
BOEM-2022-0071-0238	<p>The many Long Islanders who strive to live a healthy life while lessening our impact on our ecosystem strongly support the Sunrise Wind project. It is beneficial in every way.</p> <p>On a local level, it is impossible to overstate the positive impact of removing the fossil fuel emissions necessary to power 600,000 homes. We all breathe the same air, and</p>	Thank you for your comment.

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	<p>the fact that fossil fuel emissions kill millions around the globe and up to hundreds of thousands in the US every year needs to be factored into every decision regarding energy production. The quality of our air not only kills, but it sickens countless people of all ages—from the developing fetus to seniors to the immune compromised and everybody in between.</p> <p>On a global level, it is essential that we remove fossil fuel emissions from our atmosphere as soon as possible. The impacts of not addressing the destabilization of our climate will affect Long Islanders and every other part of our country and world.</p> <p>New York’s leadership on clean energy helps to set the tone for the world to follow, and requires anything but sacrifice from us. For our efforts, we will reap the benefit of hundreds of well-paid jobs, cleaner air, and a stable climate.</p> <p>For our region, for our world, for our children and future generations, we urge the BOEM to approve the permit application for Sunrise Wind.</p>	
BOEM-2022-0071-0239	<p>As a lifelong resident of Long Island I am in favor of Sunrise Wind offshore wind farm project. Sunrise plans to invest hundreds of millions of dollars to create clean renewable energy sufficient to power 600,000 homes on Long Island.</p> <p>The first home my wife and I purchased was in Island Park not far from an old LIPA power plant. This plant was rarely used at that time (mid to late 1990’s). When it was powered up it created a dark cloud of exhaust which was disturbing to see. Several people on our block were diagnosed with rare cancers. The family two doors down lost a young son to cancer. I don’t know if there was a causal link between these things but it was a factor in our decision to sell that home and move to a different area when our son was a toddler and we were expecting our daughter.</p> <p>I hope the clean energy produced by this wind farm will reduce the need to use obsolete and deteriorating power plants in Island Park, Northport, Port Jefferson and</p>	Thank you for your comment.



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	<p>other towns on Long Island during times of peak demand and will reduce the stress on our electric grid.</p> <p>Thank you for this opportunity to provide my opinion.</p> <p>Sincerely,</p> <p>William Adams Smithtown, NY</p>	
BOEM-2022-0071-0247	<p>Dear Program Manager: I am pleased to write this letter in support of the Sunrise Wind project. As the world's leading Geo-data specialist, Fugro provides integrated data acquisition, analysis and advice to help our clients mitigate risk during the design, construction, and operation of their assets. In the renewable energy market, our solutions have been used in over 50% of offshore wind farm projects globally. The expansion of offshore wind in the US is a key part of global transition to a sustainable energy future. We are proud to be part of this process, and have executed more than 25 offshore wind projects to date. For Sunrise Wind, our involvement has included site characterization services to inform cable corridor selection and turbine foundation design, among other critical development activities. It is a project that we believe should move forward as scheduled to become one of the first full-scale offshore wind developments in the country. Thank you for this opportunity to provide support for the Sunrise Wind project. Sincerely, Andrew Cooper Director Offshore Wind, Americas Branch Manager, Virginia</p>	Thank you for your comment.
BOEM-2022-0071-0252	<p>I believe very strongly in renewable energy. This project's long-term benefits go beyond our community and extend to the planet's well-being. The vision of our children's future is far more important than a few people's view from their houses. Please think big picture here!</p>	Thank you for your comment.
BOEM-2022-0071-0258	<p>Dear Members – As union families, we strongly believe in solving today's environmental challenges in ways that both create and maintain quality jobs to build a stronger, fairer economy. The planned Sunrise Wind offshore wind project will bring</p>	Thank you for your comment.

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	<p>jobs, training and economic benefits directly to union families and local communities. But your assistance is needed today to help the process advance through permitting process. After years of careful planning, community outreach, and extensive studies, the Draft Environmental Impact Statement for the Sunrise Wind project has been released for public comment. This is major milestone in the overall permitting process. Now, people across the U.S. can submit comments on the DEIS, calling on the Bureau of Ocean Energy Management (BOEM) to keep offshore wind projects on track, without delay. But we need to amplify labor’s voice and let BOEM know how important the project is in delivering union jobs. We encourage all members to make their voices heard, as offshore wind has the potential to stimulate local economies throughout New York – and more regulatory hurdles from BOEM would put delivering those union jobs at risk! BOEM is now accepting comments from the public until February 14, 2023 and we need your help to speak out! We’d ask that you take a minute of your time today to easily submit comments online in support of the project – encouraging BOEM to move the permitting process forward and unlocking the economic and jobs potential of the U.S. offshore wind industry. ONLINE WRITTEN COMMENTS The easiest way to share your support of this critical project is to submit comments ONLINE. First, click here to go directly to the Notice’s webpage: <a href="https://www.regulations.gov/document/BOEM-2022-0071-0001">https://www.regulations.gov/document/BOEM-2022-0071-0001</a> Then, follow these easy steps to submit your comment: · Click the “Comment” button on the top left · Once on the Comments page, enter the required personal information and your comment: · Either type or paste your comment in the appropriate field. · OR, you can attach/drop a file (Word doc, pdf, etc.) into the appropriate field to upload your comment (on organizational letterhead, for example). · As a member of IBEW Local Union 25 ,I write in support of Sunrise Wind. Offshore wind projects are critical to solving today’s environmental challenges in ways that both create and maintain quality jobs to build a stronger, fairer economy.</p> <p>· Sunrise Wind alone is investing hundreds of millions of dollars in New York that will create hundreds of union jobs around the state. And once complete, the project will</p>	

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	<p>power more than 600,000 homes annually with clean energy.</p> <ul style="list-style-type: none"> <li>· Orsted and Eversource, the project developers, have signed a Project Labor Agreement with the North American Building Trades and Local Building Trades Councils to ensure their projects will be built with local union labor. This important agreement gives us confidence that Sunrise Wind will be constructed under fair and equitable terms for members of our union family.</li> <li>· I urge BOEM to support the approval of Sunrise Wind so that we may get to work, and many more residents can begin to realize the multi-faceted benefits of this important project.</li> </ul>	
BOEM-2022-0071-0265	We need more wind farms! Offshore wind is a spectacular way to do it! I am a sailer and I LOVE seeing windmills in the water! Off shore wind Off shore wind!!!	Thank you for your comment.
BOEM-2022-0071-0266	I am all for this project as long as PSE&G uses any energy saving to either lower the cost of electric power to consumers, or uses the additional profit to upgrade the power infrastructure on Long Island - i.e. make underground power lines the standard and upgrade the entire island to this standard over the next 15 years. This will reduce our vulnerability in future severe weather events. They are asking the citizens to give up partial view of the ocean and clear access to it from the bay, so this can't just be for more profit on the part of the utility. This move needs to be reciprocal.	Thank you for your comment.
BOEM-2022-0071-0267	The principle of increasing sources of clean energy is absolutely necessary. However, information regarding potential adverse impacts affecting navigation and fishing should be fully vetted.	Thank you for your comment.
BOEM-2022-0071-0277	This is a great opportunity for folks in the trade union to partake in the green energy movement. We need opportunities to pivot our craft from industries that are being phased out. This would be an amazing opportunity to do just that and have it done safely with skilled union labor.	Thank you for your comment.
BOEM-2022-0071-0278	I want to keep this brief and short, there should be no reason why this project hasn't already hit the ground running. There are endless opportunities and environmental	Thank you for your comment.

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	<p>advancements that this project will bring, not to mention its clean energy which is what our world needs right now. Also the family's of not only the workers but the residents locally will be benefited hugely from this whether it be work opportunities or a better way of life.</p>	
<p>BOEM-2022-0071-0279</p>	<p>I think this is a step in the right direction as we need to continue to explore and expand our energy options particularly in the renewable energy sector.</p>	<p>Thank you for your comment.</p>
<p>BOEM-2022-0071-0282-0001</p>	<p>"My name is Tom Barracca. I'm currently employed with Stony Brook University and I'm the associate Director of Growth in the Office of Economic Development.</p> <p>I want to call and express my support of the Sunrise Wind Project as proposed by Ørsted and Eversource. Stony Brook University, for those who are not familiar with it, is a flagship research institute for the State of New York school system -- university system. In addition, I'm a longtime energy professional with over 29 years at local energy companies and utilities in New York State. In such role, I've served as project manager for renewable energy programs for the Long Island Power Authority, and as a manager of electric system reliability. More recently, I've worked in technology companies and offshore wind in the United States and Europe.</p> <p>I believe Sunrise Wind Project brings significant economic and environmental benefits to Long Island, New York, and the US economy. This project will be the second project in New York and will help achieve the State's aggressive energy mandate of nine gigawatts of offshore wind by 2035. Primarily, the economic benefits we're going to see is a creation of over 800 direct jobs and over 1200 indirect jobs in New York. Primarily, from the university standpoint, this project's very important. Ørsted and Eversource have worked with the State university system in NYSERDA, which I mentioned before to do groundbreaking studies in both electrical engineering and environmental marine scientists to support some of the work in the DEIS.</p> <p>Also, very important to us is the \$10 million used for the National Offshore Wind Training Center, which is located in Suffolk County to promote good-paying union jobs</p>	<p>Thank you for your comment.</p>

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	<p>as well as professional workforce development to support this huge growing industry in the US. From an environmental perspective, Ørsted has to be commended to start its analysis many, many years ago leveraging the groundbreaking work that was done by NYSEDA, to evaluate the optimal offshore site locations through Sunrise Wind" s Construction Operation Plan that BOEM submitted in 2020. I know firsthand that Ørsted and Eversource have been very, very visible in the community working with stakeholders to collect additional data since that time to support the plan that's in front of BOEM right now, to minimize the environmental impacts of the project, and make the most cost- effective, clean energy project they can. In this process also, the Sunrise Wind Team has been very transparent. They've had a number of stakeholder and community meetings here on Long Island and in the region, and they've listened to those stakeholders and the plan that's here today is a result of that. In addition, they've worked with Stony Brook University's leading program in atmospheric marine sciences, and they were looking for independent study of some of the challenges they're faced in doing this project, and I know firsthand that they've gotten some great results looking at the effects of the project on fish migration and trying to minimize those factors.</p> <p>From a utility perspective, clean energy is not just something mandated by the federal government located on the main East/ west corridor of transmission lines of the Long Island Power Authorities electric system, that serves over 1 million electric customers, population of 3 million customers, and only a thousand square miles. The LIPA System currently receives its electric generation from three major -- major fossil power plants, and many, many other small fossil fuel generators, as well as import cables from New York City, New Jersey, and New England.</p> <p>So, the bottom line is there – you're replacing a significant chunk of that fossil generation with clean energy in the load center where it's needed and from New York State, but it's something that's really needed in the Downstate New York area. As everyone probably knows, it's the most load- intensive area of the United States, and</p>	

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	<p>bringing clean power into this area is critical, and offshore wind's the best way to do it. Sunrise Wind is ideally located from a grid perspective, to bring over one megawatt of power into the Holbrook substation, which is located on the main East/ west corridor of transmission lines of the Long Island Power Authorities electric system, that serves over 1 million electric customers, population of 3 million customers, and only a thousand square miles.</p> <p>The LIPA System currently receives its electric generation from three major -- major fossil power plants, and many, many other small fossil fuel generators, as well as import cables from New York City, New Jersey, and New England. So, the bottom line is there -- you" re replacing a significant chunk of that fossil generation with clean energy in the load center where it" s needed.</p>	
<p>BOEM-2022-0071-0282-0002</p>	<p>Hi, my name is Laura Fabrizio, L- A- U- R- A, Fabrizio, F- A- B- R- I- Z- I- O, and I am the co- founder of the Moriches Bay Project. For those who don" t know, the Moriches Bay Project is a not- for- profit dedicated to improving water quality. We do that primarily through oyster farming and most of our placement is done in the Moriches Bay area.</p> <p>I want to convey my support for Sunrise Wind. I commend Ørsted for their dedication to creating a world that runs entirely on renewable energy, a concept that is past due, but it" s never too late to get started. The DEIS is a testament to the thorough and necessary analysis of environmental impact and is clear proof that the clear energy created from this wind forum is a great step in the right direction of protecting our environment.</p>	<p>Thank you for your comment.</p>
<p>BOEM-2022-0071-0282-0003</p>	<p>Hi, good evening. My name is Camden Ackerman, C- A- M- D- E- N, Ackerman, A- C- K- E- R- M- A- N. I'm actually here tonight just as a resident of Long Island who is very excited about this project.</p> <p>I really, really want to commend Governor Hochul in the State of New York for making this an initiative. And I can't echo enough the gentleman from Stony Brook for everything he said. I won't take five minutes to explain everything there because I</p>	<p>Thank you for your comment.</p>

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	<p>think he did a wonderful job. But offshore energy has been a proven and successful route for energy throughout the world and as a resident of Long Island, I am hoping that New York State, the federal government, and all of Long Island will embrace this vital resource which is going to bring net positives across our region.</p> <p>And to one other point that I've heard many times from local residents who are concerned about fishing in the area, I do want to credit BOEM for their presentation earlier in the evening, for pointing out the fact that these wind turbines create artificial reefs which not even theoretically it's been proven will expand our fish population in the ocean. And I'm very excited for all of this, and I want to thank everybody and thank you for BOEM for holding these hearings.</p>	
<p>BOEM-2022-0071-0282-0004</p>	<p>Good evening. My name is Helen Torkos. I'm hoping you can hear me. Great. It's Helen, H- E- L- E- N, Torkos, T- O- R- K- O- S. I'm a director of board of directors for the Shirley and Mastic Chamber. And we are excited about this project, and we've been hearing about it for so long. It's finally time that we got a little bit more detail and this venue here, this webinar is very important to us. So, we will be sharing this information with our board members and the rest of our membership in the board. Being that we are in the Mastic Shirley area, we know that the -- we don't want any impact as far as the residents, the commercial anything like that. And I think BOEM is doing a great job with making sure that there isn't a severe impact on residents. So, we appreciate that. And that's all the comment that I needed to make.</p>	<p>Thank you for your comment.</p>
<p>BOEM-2022-0071-0282-0005</p>	<p>Great, thank you so much. My name is George Povall, G- E- O- R- G- E, P- O- V- A- L- L, and I'm the executive director of All Our Energy. We're a Long Island nonprofit focused on environmental protection and education to empower public supportive renewable energy development and inspire action to protect that environment. And we've been actually pushing for environmentally responsible development of Offshore Wind since 2014 when we -- at our inception and we're very excited to see this moving forward now.</p> <p>So, this past Friday, CBS News reported that climate change warming effects on the</p>	<p>Thank you for your comment.</p>

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	<p>ocean in 2022 are equal to five Hiroshima- type atomic bombs being detonated every second, every day for the whole year in our oceans. This amount is equivalent of over 100 times of all of the electricity generated in 2021. We must understand climate change is the number one threat to a clean and healthy ocean and all of its creatures. Delayed action is a failure for humanity. And just because what is happening is not visible to the naked eye, does not mean our ocean is not already industrialized from that climate pollution.</p> <p>In addition, we should discuss what we are doing about all of the continuous current vessel strikes on whales, turtles, and other marine mammals that have happened these last few years tragically, and all before Offshore Wind even began. We need to make sure that these whales are protected, but to pretend that we need to protect them only from offshore wind in some imagined potential scenario and not actually address the current numerous continuous vessel strikes is really a high level of environmental malpractice. We recently have two dead whales during a time of near-zero offshore wind activity in the last few weeks, how organizations can undermine their own credibility, basically connecting these to offshore wind with no science proof or reality is really just sad.</p> <p>So, we look forward to continued stringent monitoring and holding developers, the federal government and the state government to the highest possible standards to require offshore wind construction operations and maintenance, including oversight. And that should include all other traffic in the area, including with penalties for others, breaking the rules in offshore wind area during those operations.</p> <p>All Our Energy support Sunrise Wind as part of the desperately needed large- scale buildout of Offshore Wind, we know is necessary to alleviate the climate impacts that cannot begin soon enough to displace the dirty fossil fuels that are at the heart of our climate crisis. And there at the heart right now, every day in all of our industrial lives without exception, we look forward to this transition.</p>	



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<p>BOEM-2022-0071-0282-0006</p>	<p>Thank you, Marcy. It" s Maura Sperry, M- A- U- R- A, last name is S- P- E- R- Y. I am the president of the Mastic Beach Conservancy, here in Mastic Beach.</p> <p>Our mission at the Mastic Beach Conservancy is we're committed to conserving and creating a blue-green trail on the six and a half miles of publicly accessible waterfront that is mostly wetlands. We are a very underserved, low to moderate- income community that is at sea level, basically, and has really suffered and is suffering from the negative impact of sea level rise.</p> <p>We support Sunrise Wind, Ørsted, and Eversource in their efforts here to combat climate change, which is really happening at quite an alarming rate as everybody's been talking about. We look forward to working with Sunrise to help our community not only work on mitigating some of the negative effects of the climate change and sea level rise, but also in helping to educate the community and others as to what's going on, how it's going on.</p> <p>A big part of our initiatives, our educational we're collaborating with Cornell Seatuck Environmental. We hope to be working with Stony Brook. We're working with all the different governments. So, we just support this effort and we really look forward to working as a community to make improvements and, and help us as an underserved community here in Mastic Beach with Ørsted Eversource and Sunrise.</p> <p>And just wanted to thank you for the time to speak and to let you know of our support. Oh, and just to mention that the Smith Point Bridge meeting is also tonight, so, some people might be running to go to that as well.</p> <p>All right, thank you so much.</p>	<p>Thank you for your comment.</p>
<p>BOEM-2022-0071-0282-0007</p>	<p>My name" s Adrienne Esposito. It" s A- D- R- I- E- N- N- E, E- S- P- O- S- I- T- O, Executive Director, Citizens Campaign for the Environment. CCE is a 120,000 - member organization throughout New York State whose mission is to protect our environment,</p>	<p>Thank you for your comment.</p>

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	<p>our natural resources, public health, and fight climate change. I'm also testifying tonight to offer strong support for the Ørsted Project as Sunrise Wind. Not only am I the executive director of CCE, but I'm also a Brookhaven Town resident who lives on the South Shore. And as a South Shore resident, we understand and live every day what it's like to be at ground zero for climate change. This is not something we read about, you know, in the newspaper or see on the news, this is something we see out our front doors. And so, it's not just hurricanes and big storms, it's even now simple rain events and norwesters that are doing damage to our homes, our properties, our infrastructure, and costing unbelievably amounts of money. So, climate change must be addressed. It is not a luxury item to address it, it's a necessity.</p> <p>As far as the Draft DEIS is concerned, there are many things that we thought were very comprehensive about it. We want to thank BOEM for including this section that evaluated the benefits of actually addressing climate change. So, one of the things we had asked for, and you included, was that if we did nothing and climate change continues, what kind of economic and environmental impacts would that have? So, we're glad to see a section in the Draft DEIS talking about the benefits of addressing climate change.</p> <p>One thing I did not see in there that I already requested, and we're going to put more extensive comments in writing, but as we connect offshore wind, such as Sunrise Wind to the Suffolk County grid, we will be able to taper down existing fossil fuel power plants. In this case, it'll most likely be Northport or end Port Jefferson Power Plant. That not only brings us reduced air emissions but what the Draft DEIS did not talk about is how that would improve the marine environment. Both the Northport power plant and the Port Jefferson Power Plant use open- loop cooling systems, which means that they are taking out larval in both finfish and shellfish from the Long Island Sound Estuary System, and from the harbors where that intake valve is located. Also, it's not just larval, it's also juvenile fish and sometimes horseshoe crabs. So, I think there should be some section in the Draft DEIS that talks about reduced intake by either</p>	

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	<p>Northport or Port Jeff as more wind comes online and how that benefits the marine ecology in either the Port Jeff Harbor or Northport Harbor, and the Long Island Sound Estuary, which is an estuary of national significance.</p> <p>The other thing I want to mention is, just to piggyback on something Tom said, which is downstate is the load area where we need to get more renewables online. And really offshore wind is the only large- scale answer to supplant -- supplanting and replacing these fossil fuel power plants. We can only do that with Offshore Wind. Yes, we can use some solar. Yes, we can use some battery storage, but they will not be able to generate the amount of megawatts we need to close down the three antiquated power plants, that now supply significant part of Long Island" s power grid that makes Sunrise Wind even more important.</p> <p>Last thing I just want to mention is that Ørsted should be commended on their outreach to local businesses, stakeholders" marine scientists, academia, environmental groups. They really have considered themselves partners and they listen and that is a lesson to be learned, I think, and that" s how we want this to be done so that the plan is modified and adjusted based on the stakeholder" s important knowledge of the area.</p> <p>And by the way, as a user and a lover of Smith" s Point Beach, I live just 15 minutes from there. That is an ideal location for the cable connection to come online. The parking lot has never been filled. It" s well -- it is the ample room there for the cable and I think it" s a really ideal selection location. So, thank you very much and we appreciate the opportunity to speak.</p>	
BOEM-2022-0071-0282-0009	<p>Yeah. Good evening.</p> <p>My name is Gary Yerman, G- A- R- Y, Y- E- R- M- A- N. And I" d like to thank BOEM for the opportunity to speak here tonight.</p>	Thank you for your comment.

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	<p>To whom it may concern, my name is Gary Yerman, and I've been a commercial fisherman for 50 years. My son and I are the owners of New London Seafood Distributors, a New London- based unloading facility, and we have owned the business since 1989. It is home base for a dozen commercial fishing vessels, both large and small, operating inshore in sand and offshore to more than a hundred miles. We are vital to their operations, providing fuel, ice, syringe, and shipping of their annual 6 to 8 million pounds of seafood to various markets. I write on behalf of New London Seafood Distributors and as a co- founder of Sea Services North America, a multi- state consortium of active -- excuse me, of active fishermen seeking to help build US Offshore Wind farms.</p> <p>I write in full support of Ørsted and Eversource" s Sunrise Wind project. While Offshore Wind" s development presents uncertainty to many fishermen, it is just that, uncertainty. There is no doubt that uncertainty can be frightening. And while the concerns raised by others was important, we have to be willing to deal with facts rather than fear- based narratives. We have done a great deal of investigation and research and found that each of the concerns raised have been raised in wind projects around the world with virtually no correlation between early concerns and actual commercial impact where fishing grounds remained open. Moreover, here in the United States, we are calling on the global data and industry best practices to find solutions that will address the need for green energy. The fishing concerns and fears of what is being labeled as unknown.</p> <p>As commercial fishermen, local businessmen, and concerned citizens, we are first concerned about our community and profitability. Other fishermen decided to pursue dollars in the form of disruption payments, but we have found another way. We have decided to pursue a sustainable and scalable way to participate in the development to be constructively at the table. So, once we achieved a level of comfort with the Ørsted team, we began to look for ways for our vessels, along with others to work the waters with the Offshore Wind Industry. We have spent time and energy with the Ørsted's</p>	

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	<p>Sunrise Wind team, and we can say they are -- they are the very best in the Offshore Wind Industry. Their investment in the project means a great deal for several New England fishing communities, and we are already seeing economic impact in New London. We want to see Sunrise Wind move forward rapidly. We have worked for nearly four years with the Ørsted's Northeast team, and they have been straightforward, accessible, and as open as we can think they can be. We understand the concerns of some of our fishing colleagues, but given the level of commitment to investment education, job creation, and reduction of fossil fuels, we have seen benefits and know that coexistence is a good thing for the greater good.</p> <p>Two years ago, two associates and I took a trip to Kilkeel Northern Ireland to meet with a group of fishermen organized into an efficient cooperative that provides scout and safety vessels when they are not fishing. We learn firsthand how the wind farms have impacted them and how they in their community profited from them. We shared our concerns and discussed how they have worked together for a positive outcome. The results we saw were more than encouraging, and we decided to put in the time and effort to duplicate this model. That model has become Sea Services North America.</p> <p>We recognize Ørsted's commitment to fishermen as being the first to offer a substantial commercial contract that includes local fishermen to provide scout and safety vessels on Sunrise Wind Project. We completed thousands of miles of scouting with our vessels, Sea Service vessels with no issues, and with that success, it is providing further opportunities to commercial fishermen as guard vessels. That effort was rewarded with contracts that will supplement fishermen's revenue that is kept by regulations and quotas.</p> <p>That new revenue source comes at a cost: Learning the technology, upgrading health, safety, and environmental standards, and actually doing the work is required.</p>	

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	<p>The opportunities are very real with Ørsted's commitment. This is a not -- this is not a zero- sum game. It is a win- win. We strongly urge that you move the Sunrise Wind project forward with all appropriate speed. Thank you for the opportunity to speak here tonight.</p>	
<p>BOEM-2022-0071-0282-0012</p>	<p>All right. Thank you. S- C- O- T- T, Y- E- R- M- A- N. I've been fishing for 40 years, starting with my father when I was eight years old. While I don" t particularly enjoy speaking at public hearings, I'm actually glad to be here tonight, in support of Ørsted Wind -- Sunrise Wind Project. There are three things I would like to share.</p> <p>The concerns that remain out there are real about Offshore Wind. I shared them, but after really digging into offshore wind with my father and other fishermen who are now part and vessel partners in the Sea Services Group, I came away much more convinced than I thought possible.</p> <p>Particularly with the wind farms remaining open for fishing and turbines space a mile apart. My biggest concerns were resolved. If more people did the same work, I'm pretty sure they would come to the same conclusion we have with offshore wind and commercial fishing industries will be fine side by side for years to come. Ørsted's team had been straight with us from the beginning a few years back. We were toughing them as fishermen. They do what they say, and I can't ask for more than that. Ørsted Wind is providing guys like me a new way to earn money and has already been good for me and for my family.</p> <p>I'm looking forward to working with Sunrise Wind this next year. Thank you.</p>	<p>Thank you for your comment.</p>
<p>BOEM-2022-0071-0282-0014</p>	<p>A- D- R- I- E- N- N- E, E- S- P- O- S- I- T- O, Executive Director of Citizens Campaign for the Environment.</p> <p>And a couple of points of clarity is all real quick. One is that I heard some folks saying that, you know, this is being rushed and it" s such a quick timeline, but actually offshore wind has been discussed and debated and researched and looked at for 18</p>	<p>Thank you for your comment.</p>

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	<p>years here in New York State. So, for us, it doesn't feel rushed, that it doesn't feel like a short turnaround, it feels like a long time in coming. So, we think the timeline" s just fine. The second thing is those that said, let's wait, you know, let's just wait and do something later. They clearly are not living on the South shore of Long Island where we feel the impact, as I said, of climate change on a routine basis. Waiting for us means worrying every day and paying for the continuing impacts associated with sea level rise.</p> <p>The third thing is we have to stop with these myths of whales. The whale mortalities have been increasing since the year 2017. When way before any exploration and assessments were being done for Offshore Wind firms, the three major causes of whale deaths are number one, ship strikes. Number two is entanglement due to commercial fishing equipment and lines left in the ocean. And the third unfortunately now is plastic pollution, which are filling up the whale's bodies. So, there's been necropsy reports, pathology reports, and there are things we need to do to protect whales and it's an urgent matter. But pointing researchers in the wrong direction hurts whales, doesn't help whales.</p> <p>And the last thing I just want to say is, you know, for those who say, well, wind isn't perfect, you" re right, you are a hundred percent correct. All large- scale energy infrastructure has some impact on our environment, but it is our obligation to choose the energy infrastructure with the least impact on the environment and to mitigate any impact it may have. And that's the process I think we're working to engage in altogether. Surely, we want to save whales and we also need to save the planet. We need to do both, and we can do both, but we shouldn't pit each both of those goals against each other. They should be partnership goals and goals we can do together collaboratively.</p> <p>So, without pointing fingers and saying disparaging things about environmental groups, I think there's a partnership to be heard there that we can accomplish saving</p>	

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	<p>nature, saving whales, and saving the planet and not compete for those goals, but rather enhance those goals. Thank you to BOEM for a great meeting and I appreciate the opportunity to make those final comments.</p>	
<p>BOEM-2022-0071-0283-0002</p>	<p>Yes. Hello, my name is Casey Petrashek. Spelled C- A- S- E- Y. Last name P- E- T- R- A- S- H- E- K. And I am here today representing the New York League of Conservation Voters, or NYLCV for short. NYLCV is a New York statewide advocacy organization committed to renewable energy and a clean energy future. Offshore wind is a top priority for us. Thank you for providing this opportunity to comment today. Offshore wind is critical to meet New York" s and the country" s renewable energy goals, reduce our reliance and fossil fuels, and rebuild around green -- green energy economy, which will provide family- supporting jobs and improve public health. New York has committed to 70 percent renewable energy by 2030 and 100 percent clean energy by 2040, including 9,000 megawatts of offshore wind by 2035 . We won" t meet our goals if we only talk about clean energy. It must be turned into reality with real projects on the ground.</p> <p>Sunrise Wind is key to meeting these goals. Sunrise Wind brings significant environmental and economic benefits. This project will generate enough clean energy to power approximately 600,000 homes and will eliminate the generation of more than 50 million tons of CO 2 over the project" s lifetime by displacing polluting fossil fuel power. Beyond the environmental benefits, Sunrise Wind will promote clean, reliable, and safe development of domestic energy sources and clean energy job creation. Hundreds of millions of dollars will be invested and more than 800 jobs will be created, including family- sustaining union jobs. The Sunrise Wind team has been nothing short of amazing partners in this process, making every effort to receive and implement community feedback. This shows in the DEIS report where the majority of the impacts identified are moderate or below with many valuable benefits as well. The New York League of Conservation Voters supports this arrangement project. Thank you for the opportunity to comment on this important project today.</p>	<p>Thank you for your comment.</p>
<p>BOEM-2022-0071-</p>	<p>Hi, I" m Beth Wahl. B- E- T- H, W- A- H- L. And I" m the past president of the Chamber</p>	<p>Thank you for your</p>



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0283-0003	<p>of Commerce of Mastic Beach in Shirley, and also the president of the William Floyd Community Summit. Most New Yorkers understand the need to combat climate change and the importance of building a more resilient economy, which is why New York has set the ambitious goal of producing offshore wind and energy by 2030 . We are proud that Suffolk County is leading the way of combating climate change and building a green economy powered by wind.</p> <p>Sunrise Wind will be the largest offshore wind farm in the country and will provide local businesses and manufacturers the chance to enter the evolving US shore on wind pipeline. With New York" s early focus on offshore wind, we are well- positioned to create a clean energy, and the offshore wind supply chain will create thousands of jobs. We have a unique opportunity to build the offshore wind supply chain here in Suffolk County and lead the way for the offshore wind in the United States. I believe in Sunrise Wind, and that offshore wind is critical to New York, our country, and actually the planet.</p> <p>Thank you so much for allowing me to comment.</p>	comment.
BOEM-2022-0071-0283-0004	<p>Hi there. Nicole Di Paolo, N- I- C- O- L- E D- I- P- A- O- L- O, and I represent the Bluegreen Alliance. The Bluegreen Alliance is a national organization that unites labor unions and environmental organizations to solve today" s environmental challenges in ways that create and maintain quality jobs and build a clean, thriving, and equitable economy. In the United States, we face the dual crisis of climate change and increasing economic inequality and for far too long we’ve allowed the forces driving both crises to create a wedge between the need for economic security and a livable environment. We know that this is a false choice, we can, and we must address both crises simultaneously and offshore wind energy presents an unequivocal opportunity to do so.</p> <p>That is why the Biden administration has committed to deploying 30 gigawatts of offshore wind by 2030 in unlocking a pathway to 100 gigawatts by 2050. To achieve</p>	Thank you for your comment.

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	<p>these goals, it is essential that projects advance in the permitting process as swiftly as responsible development will allow. For the Blue Green Alliance, responsible development means that projects are developed in an equitable and environmentally responsible manner with high- road labor standards and attention to equity and environmental justice. This includes five key criteria. First, projects maximize the creation of safe, high- quality, and accessible union jobs over the project" s lifetime. This includes commitments to union neutrality for manufacturing, operations, and maintenance jobs, and utilizing project labor agreements for construction. Second, projects expand domestic manufacturing along robust domestic, regional, and local supply chains by maximizing the use of US- made content. Third, projects deliver community benefits with attention to environmental justice and improving access to disadvantaged communities. Fourth, projects utilize the best available science, data technology, and adaptive management strategies to avoid, minimize, mitigate, and monitor impacts to fisheries, wildlife, and marine ecosystems. And fifth, projects are guided by robust and inclusive stakeholder engagement. This includes labor organizations, tribal nations, historically underrepresented or disadvantaged communities, low- wealth communities, communities of color, and impacted ocean users.</p> <p>These imperatives are consistent with federal statutes and the commitments that the that President Biden has made to deploy offshore wind energy in ways that strengthened domestic manufacturing, increased resiliencies to the impact of climate change, conserve biodiversity, deliver environmental justice, and spur well- paying union jobs, and economic benefits. The Sunrise Wind Project will make a significant contribution towards our national goals, as well as New York" s goal to deploy nine -- nine gigawatts of offshore wind by 2035 and we urge BOEM to advance it in the permitting process.</p> <p>Thank you so much for the opportunity to comment and for your work to ensure that offshore wind projects are done right for workers, communities, and the environment.</p>	

Comment No.	Comment	Response
	Thank you.	
BOEM-2022-0071-0283-0005	<p>Great, thank you. Yes, my name is Katie Cubina, K- A- T- I- E, last name is C- U- B- I- N- A, and I represent Mystic Aquarium, located in Mystic, Connecticut.</p> <p>Thank you for giving me the opportunity to testify on behalf of my organization. Here at Mystic Aquarium, our mission is to inspire people to care for and protect our ocean planet through conservation, education, and research, and it is those three areas that I oversee. When our guests come on campus, they see incredible exhibits in animals, but they also see the threats that our oceans face today. And one of the greatest threats that our oceans face is -- is that of global warming and climate change in all of the related issues that come with that. It is with that in mind that we are committed to putting our full support behind the Sunrise Wind Project and Ørsted Eversource in their efforts as it relates to the sustainable and responsible development of offshore wind.</p> <p>We are also committed through our research, education, and outreach program to be an active agent in -- in the responsible development of offshore wind through our research program, which focuses on marine biodiversity and aquatic animal health. As it relates to our guests and our young people, we have an exhibit on renewable ocean energy and within a gallery entitled, " Ocean Solutions." So, we can look to the ocean and with smart decision- making, responsibly develop aspects of the ocean to solve some of our most pressing environmental crises and climate is certainly at the top of the list.</p> <p>We also are committed to making sure that young people are prepared for all of the available jobs that will result from the emerging offshore wind industry on the Eastern seaboard. And so, with that in mind, we also work with Youth Serving Organizations in the region and through an exhibit on our campus because we know that the equitable employment and frontline communities who have borne the brunt of climate change</p>	Thank you for your comment.

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	<p>need to be adhered to the -- the best practices and principles for gaining access to the jobs that will be available.</p> <p>Our experience working with Ørsted Eversource has been really positive as a partner in this region, which we are in southeastern Connecticut, and we look forward to continuing to work with them to make sure that the goals of mitigating climate change and providing jobs to -- to our region are fulfilled. Thank you.</p>	
<p>BOEM-2022-0071-0283-0006</p>	<p>I am Stacy Sikes, S- T- A- C- Y S- I- K- E- S, and I am the Vice President of Government Affairs and Communications at the Long Island Association, which is our region" s leading business organization. Long Island has close to 3 million people and is larger than 15 states. And our goal at the LIA is to make Long Island the offshore wind capital of the United States. Sunrise Wind is key to that strategy.</p> <p>Ørsted and Eversource have demonstrated a strong and unwavering commitment to Long Island through a series of initiatives and investments. They have spent countless hours meeting and partnering with other Long Island Association members, community organizations, workforce development programs, small businesses including MWBE, and veteran- owned companies and labor unions.</p> <p>Sunrise Wind will result in significant economic and environmental benefits to Long Island. This offshore wind project will be the second to connect in New York and will help the State achieve its energy -- clean energy mandate to build nine gigawatts of offshore wind by 2035. The developers have been working closely with the Town of Brookhaven on its plan interconnection at the Holbrook Substation, and we are excited for this project to become operational by 2025 .</p> <p>Sunrise Wind submitted its construction and operation plan to BOEM in 2020 and has continued to work tirelessly to collect data and to provide all agencies and stakeholders with information on the benefits and environmental impacts of the project. The DEIS that is subject of -- that is the subject of this public comment process</p>	<p>Thank you for your comment.</p>

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	<p>is comprehensive, and the project will have substantial and -- substantial and meaningful long- term clean energy benefits and is transformative in terms of the economic opportunities it offers, including 800 direct jobs, 200 indirect jobs, and a direct investment of more than \$400 million in New York State.</p> <p>Sunrise Wind has already committed to the following: \$ 10 million for a National Offshore Wind Training Center that will be located in Brentwood in Suffolk County; \$ 5 million for a research and development partnership with Stony Brook University, locating an operations and maintenance hub in Suffolk County that will serve the joint ventures team of a portfolio of projects, and Port Jefferson will be the home port of a service operation vessel that will support maintenance operation of the portfolio of projects from the developers in the Northeast.</p> <p>Ørsted and Eversource are actively engaging local businesses to become part of the supply chain through several different Long Island Association events and forums across our region. Sunrise Wind offers tremendous opportunities to Long Island, New York State, and the entire United States as a way to transition to clean energy by meeting New York" s ambitious goal of 70 percent of renewable energy by 2035, creating good paying and union jobs, providing opportunities to businesses operating in traditionally underserved communities, and will further solidify a domestic offshore wind industry. And therefore, we ask that you approve the DEIS and Sunrise Wind Construction and Operations plan. Thank you.</p>	
BOEM-2022-0071-0283-0008	<p>Fantastic. Thank you. My name is Daniel Busi, spelled B as in boy U- S- I, and I work for Renewable Energy Long Island. In addition to being a program manager for Renewable Energy Long Island, I have 10 years of experience working in the field of sustainability along with a Bachelor of Science in environmental science. I" m not an alarmist. I don't consider myself an -- I consider myself an optimist, but there's no doubt in my mind that earth is in desperate need of change when it comes to our energy production.</p> <p>As we're talking about offshore wind, it's worth noting that over the past 30 years,</p>	Thank you for your comment.

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	<p>we've lost 50 percent of earth's coral reefs. We're currently going through a sixth extinction on this planet, a loss of life not seen for over 65 million years. And scientific consensus indicates that the primary cause of this is climate change brought on by global warming.</p> <p>The primary problem has been identified and so have solutions. Wind power is undeniably one of these solutions. Wind power, specifically offshore wind power is one of the most efficient sources of renewable energy production humans have ever created. As we begin to phase out our dwindling supply of conventional fossil fuels, utility energy production systems need to be powered by renewable options. Much of the rest of developed world knows this, and our European counterparts are far ahead. As someone who's traveled extensively throughout the Mediterranean Sea, the North Sea, the Baltic Sea, in 2014, nearly 10 years ago, was amazed at how extensive their offshore wind development was. As the USA begins this development process, I encourage all permitting entities to take note of their success and lessons learned and -- and help to propel the US to achieve similar accomplishments. That's all. Thank you.</p>	
<p>BOEM-2022-0071-0283-0009</p>	<p>Hi. Good afternoon. My name is Michael Daly. M- I- C- H- A- E- L D, as in David, A- L- Y. And thank you.</p> <p>I'd like to thank BOEM and the Army Corps and -- and Ørsted for all of the work that goes into creating this and I -- I represent East End YIMBY, but I'm speaking for myself today. East End YIMBY is an affordable community housing advocacy group on the East End of Long Island and we know what level of work that has to go into anything that's bringing about change in our communities. And we know that the public comment period can be arduous and very, very difficult, so you've done a great job today. Thank you for that. I'm in support of the Sunrise Wind LLC proposed wind farm offshore in New York. Wind farms have proven productive and a safe way to provide electricity and reduce our dependency on fossil fuels, which contributes to global warming. I am an East End resident currently I live in Sag Harbor, and I have been following the South Fork Wind project for a number of years. And I've had the good fortune to be educated</p>	<p>Thank you for your comment.</p>

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	<p>by people from Ørsted, from fishery people, from elected officials and -- and actually watched the -- the work that they" re doing to -- to bring that -- that project into development.</p> <p>So, I have -- while I have friends who are -- are -- are fisher people and farmers and also Native Americans, I -- we are -- we are friends of the Shinnecock Nation, and I'm so glad that you are including them in this conversation because they are the ultimate water defenders on our East End. From watching, I -- I have a great deal of confidence that this is going to be done correctly, and we certainly don't want to see any damage done to the cod industry, that's my favorite fish. But we are confident that through this process and the -- the technology that's been developed over many years, that this development will be constructed safely, securely, and using environmentally sound measures. So, thank you for all your work, and Godspeed on all of this.</p>	
<p>BOEM-2022-0071-0283-0011</p>	<p>Thank you. This is -- my name is Roger Clayman, R- O- G- E- R C- L- A- Y- M- A- N. I" m representing the Long Island Federation of Labor AFL- CIO. We are the fourth largest organization in the AFL- CIO of Central Labor Councils. We represent 250 , 000 union members on Long Island with their families. We've been promoting offshore wind for - - on Long Island for more than 10 years. I want to thank you for your opportunity to provide the reasons for -- from the perspective of organized labor to approve the Construction and Operations Plan, allowing this very much- needed offshore wind project to move forward.</p> <p>Sunrise Wind has worked hard to collect data and to provide all the agencies, stakeholders, and individuals with information on the benefits and potential environmental impacts of the project. From our perspective, that's the strength of the proposal submitted by Ørsted Eversource. They have demonstrated a unique ability to communicate with stakeholders with great clarity and detail over many years of planning in this region. The public can be assured that the substantial economic benefits offshore wind will bring to this region and the nation will be done in an environmentally sensitive manner and a way that is understood by the public.</p>	<p>Thank you for your comment.</p>

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	<p>There's really deep and diverse stakeholder support among local environmental and labor organizations on Long Island. I am really proud to say that Brookhaven Town Board and Suffolk County have executed agreements to authorize the use of publicly owned real estate and rights of way for the preferred route. I'm a -- I live- in Brookhaven at Suffolk County, so I -- I'm pleased that that has taken place.</p> <p>Of course, the jobs created by this project are a major interest to our labor movement. Construction and operation of Sunrise Wind will create more than 800 direct jobs and over 1,200 indirect jobs in New York. Construction of Sunrise Wind will be performed under a project labor agreement. This creates union jobs, which allows our communities to grow and prosper. It provides the opportunity for apprenticeship opportunities and pre- apprenticeship outreach into underserved communities. Long Island will become a center for offshore wind work -- the workforce and will be the center of a major industry that both strengthens our -- our economy and combats climate change at the same time.</p> <p>You've heard listed publicly some of the great benefits and investments, \$5 million research and development, partnership with Stony Brook, locating the Operations and Maintenance Hub in East Setauket, and Port Jefferson, the home to the port for service operations vessel, for operations and maintenance. There's also, of course, the supply chain which is very important for our region in Albany. But I'm -- can tell you from firsthand my work with the -- their investment, the \$10 million investment in the National Offshore Wind Training Center is going to be vital for everyone. It'll provide Global Wind organization certifications and is made possible by the investments of Ørsted Eversource.</p> <p>The -- we believe that as it's been stated and we've said this many times that -- that Americans should not have to choose between a good job and a clean environment. We can and must have both. And this project it's not only an opportunity not only to</p>	



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	<p>keep the -- our clean energy future on track, but we" ll create the family- sustaining union jobs at the same time.</p> <p>I urge BOEM to move forward with the Sunrise Winds permitting process. Thank you for the opportunity to speak.</p>	
<p>BOEM-2022-0071-0284-0001</p>	<p>Thank you for facilitating. My name is Jok Kommer. Joseph Kommer to those that want my real first name. I'm a homeowner in Riverhead, a retired science teacher from the east end of Long Island, and have spent the better part of my adult life on Eastern Long Island.</p> <p>I have no direct concerns on the organization of this project because it seems that BOEM and the Corps of Engineers and the other organizations are expressing at least due diligence on the science aspect and also obviously in the permitting process. I do think it's very important that given that there is both beneficial and adverse effects to be anticipated before, during, and after, that there is very close attention paid to those things, especially as related to onshore resources that are created for maintenance of the systems, and for delivery of the electricity but as well as the offshore concerns legitimately expressed by the fishing community, especially recreational fishermen. Many of those things have been addressed by spacing and other considerations on the turbines themselves. But it will require a continuous monitoring effort during the entire process of construction because that'll be very heavy shipping. And then also during the maintenance phase, while the turbines are in operation.</p> <p>I also have concern for the fact that as a part of this very great undertaking by the State of New York and also by the federal government in pushing it in other States as well, that these things be communicated effectively to the public. Part of that responsibility I think goes to the organizations that will generate the power and benefit from it financially. And so, they have a responsibility to the -- the constituents that are allowing these things to happen in their waters and crossing the land areas where they will cross. Toward that end, I think it's an important opportunity to educate people on</p>	<p>Thank you for your comment.</p>

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	<p>how things are done safely and what considerations are given to wildlife fisheries of all sorts to the benthic environment as well as to the coastal environments and in addition to the humans that will be affected by this project and by the other ones that will soon follow it. I am very much a proponent of wind energy off our shores and see that the beneficial impacts will certainly have to outweigh the adverse impacts but that they can also not be done at the cost of serious socioeconomic adverse impacts or ecological impacts.</p> <p>Thank you very much for the opportunity to speak, and I'll turn it back over to you, Marcy.</p>	
BOEM-2022-0071-0284-0002	<p>So again, that's Fred Zalcmán. Last name is spelled Z- A- L- C- M- A N, and I'm with the New York Offshore Wind Alliance. So again, thank you for allowing me to speak today in support of the Sunrise Wind Project, and to urge the prompt approval of the project's construction and operation plan. As I indicated, my name is Fred Zalcmán, I'm the director of the New York Offshore Wind Alliance. We're a diverse coalition of the world's leading offshore wind, project developers, environmental NGOs, labor, and other supporters all joined together to support the development of a robust and responsible offshore wind ecosystem in New York State.</p> <p>The Sunrise Wind Project is a critical component in New York's nation-leading effort to power its economy based entirely on clean, renewable, and carbon-free energy sources, New York's Landmark Climate Leadership and Community Protection Act. The project will provide enough electricity to serve the equivalent of 600,000 New York households and represents a significant down payment towards decarbonizing New York's grid. Studies indicate that New York will need nearly 20 gigawatts of offshore wind by 2050 to meet its decarbonization objective. And the Sunrise Wind Project is the first albeit, critically important step in that journey, instilling the confidence of diverse stakeholders from investors, workers, local communities, and ocean users, that this nascent technology can be deployed responsibly and at scale to meet our most pressing energy environmental and equity challenges.</p>	Thank you for your comment.

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	<p>Indeed, the Sunrise Wind Project is about much, much more than carbon- free electrons that will eventually produce. For example, the Sunrise Wind Project is the impetus for the developer’s significant investment in and modernization of New York" s port infrastructure. Including the transformation of the Port Jefferson Harbor into a regional operations and maintenance base for Ørsted’s portfolio of Northeast projects, creating hundreds of permanent high- quality, high- paying jobs over the 30 - plus years year operating life of these wind farms. And speaking of jobs, Sunrise Wind is investing heavily in workers. In collaboration with the union, construction, trades, academia, and local government, the Sunrise Wind Team is standing up the nation" s first training institute for the advancement of skills requisite to meet the offshore wind industry" s growing needs. The project is also helping to restore Upstate New York" s proud manufacturing legacy with investments like the one with Wellsville, New York- based Ljungstrom to fabricate advanced foundation components.</p> <p>The proponents of Sunrise Wind have developed the project with great care to avoid, minimize, and mitigate the potential negative impacts. The project" s construction and operation plan is the result of several years of careful study stakeholder consultation, negotiation, and design to account for the project area’s distinct geotechnical and geophysical characteristics, biology, and maritime uses. For example, the project" s turbine layout in a one nautical mile by one nautical mile east- west grid pattern was developed with significant input from the US Coast Guard joining leaseholders and commercial fishers to accommodate the safe navigation in and through the Sunrise Wind Lease area. As the DEIS reveals, the vast majority of impact areas are rated at moderate or below, with remaining residual impacts amendable in mitigation.</p> <p>So, thank you again for this opportunity to touch on some of the many unique benefits of this cutting- edge project. I urge BOEM to move carefully, but expeditiously to a final EIS, and COP approval.</p>	
BOEM-2022-0071-	Dear Program Manager:	Thank you for your

Comment No.	Comment	Response
0081	<p>I am writing to you today in support of the Sunrise Wind project. As America grows its offshore wind industry, we have the opportunity to shape the future of the energy market in the United States.</p> <p>American Offshore Services LLC (A-O-S) is a New Bedford, Massachusetts-based CTV owner and operator, providing personnel and equipment transportation to offshore wind farms and installations with custom-made vessels built in the US.</p> <p>We have the unique opportunity to build the future of the energy industry in our country. We are uniquely positioned to build the future of the green-energy industry in the US through the creation of lucrative job opportunities that will be sought after by those looking to build their American dream, create families, and purchase homes. We have the opportunity to create a green economy that will save our planet and deliver the next generation a cleaner environment and stronger future.</p> <p>It is a rare opportunity to get in on the ground floor of an economic revolution. This is our window to impact the future through the creation of new relationships, supply lines, and new markets. We are proud to be a part of this revolution.</p> <p>BOEM provided multiple alternatives for further review. Within those alternatives, there is one that BOEM should not consider – No Action. No Action could hinder further development of the U.S. offshore wind domestic supply chain. The supply chain needs clarity and confidence that projects can move forward, and in a timely manner. We need Sunrise Wind to be built.</p> <p>Sunrise Wind is good for the economy, environment, and our nation’s energy security. I urge you to approve this project on its current timeline and keep our industry working.</p> <p>Sincerely,</p> <p>Clark Buffam Managing Director</p>	comment.
BOEM-2022-0071-	Dear Program Manager:	Thank you for your

Comment No.	Comment	Response
0074	<p>I am writing to you today in support of the Sunrise Wind project. As America grows its offshore wind industry, we have the opportunity to shape the future of the energy market in the United States.</p> <p>Vaisala is a global leader in weather, environmental, and industrial measurements. Building on over 85 years of experience, Vaisala provides observations for a better world, with space-proof technology even exploring Mars and beyond. We are a reliable partner for customers around the world, offering a comprehensive range of innovative observation and measurement products and services, including the renowned WindCube suite of lidars for wind measurement.</p> <p>We have the unique opportunity to build the future of the energy industry in our country. We are uniquely positioned to build the future of the green-energy industry in the US through the creation of lucrative job opportunities that will be sought after by those looking to build their American dream, create families, and purchase homes. We have the opportunity to create a green economy that will save our planet and deliver the next generation a cleaner environment and stronger future.</p> <p>It is a rare opportunity to get in on the ground floor of an economic revolution. This is our window to impact the future through the creation of new relationships, supply lines, and new markets. We are proud to be a part of this revolution.</p> <p>BOEM provided multiple alternatives for further review. Within those alternatives, there is one that BOEM should not consider – No Action. No Action could hinder further development of the U.S. offshore wind domestic supply chain. The supply chain needs clarity and confidence that projects can move forward, and in a timely manner. We need Sunrise Wind to be built.</p> <p>Sunrise Wind is good for the economy, environment, and our nation’s energy security.</p>	comment.

Comment No.	Comment	Response
	<p>I urge you to approve this project on its current timeline and keep our industry working.</p> <p>Sincerely,</p> <p>Laura Lear Head of Global Marketing</p>	
BOEM-2022-0071-0044	<p>Dear Program Manager:</p> <p>I am writing to you today in support of the Sunrise Wind project. As America grows its offshore wind industry, we have the opportunity to shape the future of the energy market in the United States.</p> <p>VHB’s diverse team brings together our collective knowledge, technical excellence, and wide network of trusted relationships across our footprint to address our clients’ most complex challenges. VHB’s work helps improve mobility, enhance communities, build resilience, and contribute to economic vitality. Our holistic problem-solving philosophy is ingrained in all that we do, and each project considers environmental, social, and economic factors that result in sustainable solutions. VHB collaboratively applies technical skills anchored in this philosophy to deliver lasting results that help communities thrive for generations to come.</p> <p>We have the unique opportunity to build the future of the energy industry in our country. We are uniquely positioned to build the future of the green-energy industry in the US through the creation of lucrative job opportunities that will be sought after by those looking to build their American dream, create families, and purchase homes. We have the opportunity to create a green economy that will save our planet and deliver the next generation a cleaner environment and stronger future.</p> <p>It is a rare opportunity to get in on the ground floor of an economic revolution. This is our window to impact the future through the creation of new relationships, supply lines, and new markets. We are proud to be a part of this revolution.</p> <p>BOEM provided multiple alternatives for further review. Within those alternatives, there is one that BOEM should not consider – No Action. No Action could hinder</p>	Thank you for your comment.

Comment No.	Comment	Response
	<p>further development of the U.S. offshore wind domestic supply chain. The supply chain needs clarity and confidence that projects can move forward, and in a timely manner. We need Sunrise Wind to be built.</p> <p>Sunrise Wind is good for the economy, environment, and our nation’s energy security. I urge you to approve this project on its current timeline and keep our industry working.</p>	
<p>BOEM-2022-0071-0029</p>	<p>Dear Program Manager:</p> <p>I am writing to you today in support of the Sunrise Wind project. As America grows its offshore wind industry, we have the opportunity to shape the future of the energy market in the United States.</p> <p>At HeliService USA we are proud to be providing environmentally friendly offshore transportation in support of Sunrise Wind. Utilizing aircraft we minimize the impact on local marine life and consume less carbon than alternative options. We’re proud to have been chosen by Ørsted to provide these services and appreciate their focus on protecting the environment.</p> <p>As a Rhode Island based company we are staffed locally and will be hiring dozens more employees over the coming years. We also believe in supporting those who’ve served and well over 50% of our current employees are veterans. These are extremely well-paying jobs that support development of the local economy. Timely approval of this project is critical to us reaching our employment targets and our full level of staffing. Any delays could mean potential staffing cuts.</p> <p>We have the unique opportunity to build the future of the energy industry in our country. We are uniquely positioned to build the future of the green-energy industry in the US through the creation of lucrative job opportunities that will be sought after by those looking to build their American dream, create families, and purchase homes. We have the opportunity to create a green economy that will save our planet and deliver the next generation a cleaner environment and stronger future.</p> <p>It is a rare opportunity to get in on the ground floor of an economic revolution. This is our window to impact the future through the creation of new relationships, supply lines, and new markets. We are proud to be a part of this revolution. BOEM provided</p>	<p>Thank you for your comment.</p>

Comment No.	Comment	Response
	<p>multiple alternatives for further review. Within those alternatives, there is one that BOEM should not consider – No Action. No Action could hinder further development of the U.S. offshore wind domestic supply chain. The supply chain needs clarity and confidence that projects can move forward, and in a timely manner. We need Sunrise Wind to be built. Sunrise Wind is good for the economy, environment, and our nation’s energy security. I urge you to approve this project on its current timeline and keep our industry working.</p>	



**O.7.2. General Opposition**

**Table O-35. General Opposition Comments**

Comment No.	Comment	Response
BOEM-2022-0071-0013	Once again. No. <a href="https://dgrnewsservice.org/civilization/ecocide/climate-change/how-many-more-dead-whales/?utm_source=DGR+News+Service&amp;utm_campaign=19bd79de17-RSS_EMAIL_CAMPAIGN&amp;utm_medium=email&amp;utm_term=0_51489b99cd-19bd79de17-481430028">https://dgrnewsservice.org/civilization/ecocide/climate-change/how-many-more-dead-whales/?utm_source=DGR+News+Service&amp;utm_campaign=19bd79de17-RSS_EMAIL_CAMPAIGN&amp;utm_medium=email&amp;utm_term=0_51489b99cd-19bd79de17-481430028</a>	Thank you for your comment.
BOEM-2022-0071-0014	These wind turbines are. BAD idea. They are fossil fuel dependent. The energy it takes to mine, manufacture, install and operate over ride any benefit. They are also not efficient. They will cause more weather storms. They kill wildlife. They are noisy. They are ugly. They are destructive. Please stop these wind farms. They are worse than oil. Please plant trees.	Thank you for your comment.
BOEM-2022-0071-0016	At the outset, I state that I am in favor of developing wind power as a viable source of energy for our future. After examining the Mitigation and Monitoring document I have some questions and concerns before this project moves forward. The use of language like "to the extent practicable" seems like a vague enough loophole since the public does not really know what the corporation doing the work deems "practicable". Also, though the fishing industry, recreational fishing, and "protected species" have much specificity devoted to their concerns, it seems to me that ALL marine mammals are protected species (as of 1972). What, exactly, is "incidental" loss or damage to these mammals? How many is too many. We do not want to drive successful marine mammals into the same category as the North Atlantic Right Whale! At present, several other species of whales have washed up dead and at least one was caused by boat strike. Would these be considered "incidental"? Mitigating damage to bird and bat populations is critical. Has this corporation drawn from the experience of other companies in other countries where wind farms are in extensive use? How much of this prior experience has gone into the pre-construction planning of this off-shore development? What studies have been conducted regarding flight patterns, migration patterns, animal navigation systems? I would appreciate even more details shared with the public, people who have no technical or biological training, so that we can better understand the risks here, along with the benefits.	Thank you for your comment.
BOEM-2022-	This is a matter of national security and environmental concern. How can one foreign company	Thank you for your

Comment No.	Comment	Response
0071-0025	own the bulk of the power generation sold to half the country's population? You are killing our whales and our marine life. Destroying the last natural space has left.	comment. Marine Mammals are discussed in Section 3.11.
BOEM-2022-0071-0026	Industrialization of our oceans is insane. Will destroy tourism, tourism jobs, property values, marine ecosystems, navigation and both commercial and recreation fishing. Furthermore federal scientists warned against this and should not be ignored!	Thank you for your comment. These topics are discussed within the Final EIS under the following sections: Section 3.7, <i>Benthic Resources</i> , Section 3.10, <i>Finfish, Invertebrates and Essential Habitat</i> , Section 3.14, <i>Commercial Fisheries and For-hire Recreational Fishing</i> , Section 3.16, <i>Demographics, Employment and Economics</i> , Section 3.18, <i>Land Use and Coastal Infrastructure</i> , Section 3.19, <i>Navigation</i> , and Section 3.21, <i>Recreation and Tourism</i> .
BOEM-2022-0071-0027	Industrialization of our oceans is insane. Will destroy tourism, tourism jobs, property values, marine ecosystems, navigation and both commercial and recreation fishing. Furthermore federal scientists warned against this and should not be ignored!	Thank you for your comment. This comment is a duplicate of comment submission BOEM-2022-0071-0026.
BOEM-2022-	Off shore wind farms harm the environment and disorients sea life. These projects were not	Thank you for your

Comment No.	Comment	Response
0071-0101	properly vetted and researched prior to execution. These wind farms need to be stopped or at the very least researched far more. The next issue is the fact the blades cannot be recycled and properly repurposed, and or disposed of. Wind farms, in general have not thoroughly vetted, and also kill birds at an alarming rate, and also do not generate sufficient amounts of power to warrant the devastating actions and sound waves to marine life and to bird life. I do not support windfarms, I do support green energy solutions and wish for them to be many more but currently marine-based wind farms are not a solid solution, especially in low depth situation's such as Long Island sound this project must be prevented, and/or slow down to do far more research before it can continue . I am not in support of these projects and do not work for them to proceed. At the current moment I will vote against any, and all projects until a solid green energy solution is devised and put up for proper public debate that does not harm the environment and the creatures in our environment.	comment.
BOEM-2022-0071-0116	I am absolutely against this project! I am extremely concerned about our sea life both land and sea! I also do not want our beautiful ocean view filled with these monstrosities. I am very angry that they chose our beautiful Smith Point National Sea Shore for this nightmare project. I live near William Floyd Pkwy the construction as they install the cables will effect me greatly.. I have lived here all my life enjoying our beautiful great South Bay and the ocean and I'm terrified that those turbines will be seen by boaters who frequent the moriches inlet and ocean. 100 % AGAINST THEM!! I do not think they are a solution and I've heard many negative things about them, They will greatly affect our sea life including sea birds.	Thank you for your comment.
BOEM-2022-0071-0117	It is time to slowdown all windfarm projects on the east coast, specifically the northeast coast. They are killing our whales, birds and other ocean mammals. Stop the windfarms now before you kill more of our creatures.	Thank you for your comment.
BOEM-2022-0071-0128	STOP THIS WINFARM IMMEDIATELY!!!!!! 11 WHALES IN 3 MONTHS IS TOO MANY!!! THEY ARE CONFUSED AND GETTING HIT BY BOATS OR WHATEVER IS HAPPENING TO THEM! PLEASE STOP THIS IMMEDIATELY!!!! EVEN IF THERE IS A TINY CHANCE THESE EVENTS ARE RELATED, EVERY WHALE LIFE IS IMPORTANT!!! STOP THESE WINDFARMS IMMEDIATELY!! THEY WILL ALSO KILL MANY OF OUR OCEAN BIRDS!!!! WE ALL WANT CLEAN ENERGY, BUT NOT AT THE EXPENSE OF OUR BELOVED WILDLIFE!!!! VIRGINIA MATNEY	Thank you for your comment.

Comment No.	Comment	Response
BOEM-2022-0071-0131	Watch out for the poor whales. Where is the redundancy in wind energy. Where is the back-up when wind blows less 5 mph on a cloudy day.	Thank you for your comment.
BOEM-2022-0071-0160	First of all, why do we insist of locating these windmills offshore? The cost makes this unreasonable. Let me preface that I am very pro wind power, however did the fact that these are located in salt water? Maintenance will require a calm sea to work on these windmills, we have seen a very large number of both whales washed up from the sonic equipment, large amount of birds striking these windmills blades, and the long range plan to have sustained wind power would be more logical to have these built on concrete, creating more windmills erected at a much cheaper price	Thank you for your comment.
BOEM-2022-0071-0179	this sounds like a bad idea. i think that too many birds will be injured by this also as a power plant worker i know that there is a loss of power as it is shipped. this means that if you use power far from where you generate it that it is wasteful. we dont use a lot of power in the ocean.	Thank you for your comment.
BOEM-2022-0071-0180	<p>While it is imperative that we adopt renewable sources of energy I must caution that the mechanisms and processes to procure, transmit, store, and deliver the energy must meet requirements for any other industrial process- being "green" does not lessen this requirement. The Sunrise Offshore Wind Farm will generate power using large complex structures placed in a wilderness- The near-shore Atlantic Ocean. The transmission lines will be constructed and operate in the sea floor, through the littoral zone, through sensitive barrier beach, marshland, and lagoon (Bay) environs. Normally processes like energy production/ storage/ distribution are required to avoid sensitive areas and are restricted to areas zoned for industrial/ unrestricted commercial use. The plan to place the wind farm offshore and transmit the energy through these sensitive environs places a large burden on the project to make certain these environments are not damaged during construction, operation, maintenance, and decommissioning. I believe it would be much more prudent and effective to have a land-based operation on less sensitive ground where the negative effects of the construction and operation on the environment are more easily understood and mitigated.</p> <p>Respectfully; John Buckheit</p>	Thank you for your comment.

Comment No.	Comment	Response
BOEM-2022-0071-0193	Offshore wind is very dirty, dangerous and inefficient. Benefits of offshore wind do not balance with the hazards to the environment. Please do not go ahead with this project. We desperately need alternative energy but this is not the solution. Please do not damage the environment in the process of trying to save it.	Thank you for your comment.
BOEM-2022-0071-0201	No wind farm, please. Dangerous to the environment. Birds, Mammals.	Thank you for your comment.
BOEM-2022-0071-0246	I oppose off shore wind farms because they will kill too many birds & marine life.	Thank you for your comment.
BOEM-2022-0071-0254	These wind projects have obviously had a negative impact on oceanic creatures such as the deceased whales that have washed up on the NJ shore.	Thank you for your comment.
BOEM-2022-0071-0264	<p>I am 1000% opposed to the y green wind energy proposed by sunrise wind llc</p> <p>The environmental Impacts are so evident in whaling deaths, fish declines, and the EMF emitted by cables !! The servicing and construction of these mills which BTW are only 1/50 in service at any one time ! They freeze in winter, they cause seabird and migratory bird deaths - and the oils and lubricants they require are environmental Nightmares !!</p> <p>We are on the verge of announcing in the USA new zero impact, zero emission, lean and clear energy through equatorial magnetism and other new age technologies stifflled and held in secret by the cabal and corrupt politicians !!</p> <p>Free and clean energy is REAL AND GREAT FOR THE EARTH AND ITS INHABITANTS ... people and Animals !!</p> <p>We share this space and greedy fake wind energy companies are profiting from your ignorance. STOP R*PING OUR EARTH WITH FAKE WIND PROMITING FAKE CLEAN ENERGY !!</p> <p>VOTE NO TO WIND FARMS !!!! All of them !!</p>	Thank you for your comment.
BOEM-2022-	I am completely against wind farms being implemented on Long Island and along our shores. I	Thank you for your

Comment No.	Comment	Response
0071-0276	will work hard to stop these from coming to fruition.	comment.
BOEM-2022-0071-0282-0008	<p>Mike Conroy, C- O- N- R- O- Y, Responsible Offshore Development Alliance. I hadn't planned on offering verbal comment, but you know, I felt compelled to after hearing some of the -- some of the prior comments. Unlike others, you know, the commercial fishing industry still feels as if it is not at the table, but rather at the menu when it comes to discussing Offshore Wind. Prior comments have touted both the economic and the environmental benefits of Offshore Wind. When talking about economic benefits, we heard about jobs. Yes, it's undisputed that that jobs will be created, how many of these will be long- lasting I think remains to be seen but we must be mindful that there will be job losses. In New York alone, the commercial fishing industry accounted for roughly 3000 jobs in 2019 , that from a March 2022 NMFS report discussing fisheries economics of the US. And if you look across the entire mid- Atlantic region, which includes New York, New Jersey, Delaware, Maryland, and Virginia, that number is just below 30,000 jobs.</p> <p>The commercial fishing industry along the eastern seaboard is comprised of many small businesses. Not all of these businesses will be able to survive the incursion of the Offshore Wind Industry. This will surely negatively impact the shoreside businesses, which are dependent upon the fish harvested by our commercial fishermen and women. We must not forget the importance of our food security, which our domestic harvesters are a key element.</p> <p>We do not dispute the need to reduce our reliance on fossil fuels. We have always advocated for responsible development on the outer continental shelf. Unfortunately, the current BOEM process does not allow for a truly transparent public process at the outset from the siding decision- making process. Telling the ocean users where offshore wind is to be placed is vastly different than asking those users where offshore wind can be located, which will avoid impacts to those users, or at the very least, minimize those impacts which are unavoidable.</p> <p>Offshore wind is being touted as the answer to all of our climate issues, but Offshore Wind is not without its problems. Study came out in November, which found that offshore wind will change marine ecosystems. In May, NMFS, office of protected resources sent a letter to BOEM</p>	Thank you for your comment.

Comment No.	Comment	Response
	<p>highlighting concerns regarding impacts on lower levels of the food chain, which could have population impact to the critically endangered North Atlantic right whale. And over the last two months, at least seven whales have washed up on beaches in the area. I think contrary to what a prior speaker claimed, I do believe there was some survey work that was taking place during that timeframe. It may not have been for the Sunrise project, but I do believe there's been some survey work ongoing.</p> <p>And -- and like others, we will be submitting more detailed comments on or before the public comment deadline. Thanks.</p>	
<p>BOEM-2022-0071-0282-0010</p>	<p>My name is Ricardo Sanchez. I do not represent any organization other than the apparently growing number of citizens concerned with the speed with which the Offshore Wind project is growing, particularly in contrast to the much lower speed with which we are improving our understanding of the potential negative impacts of the project.</p> <p>A good example that would give some illustration to that idea of the slow progress in understanding of negative impacts is the April 22nd document by BOEM on the business of the open loop cooling systems.</p> <p>Basically, it's a short document that in virtually every paragraph closes with -- well, we really don't know. You know, for example, the elevation of temperatures may indeed force some animal capital to move from those warm waters, but then again, some fish may actually like to be in warm waters, you know, and that kind of thinking is throughout that document that really makes you think that will be really wise to wait until we actually figure out the quantitative impacts of these intervention before we just jump into building it.</p> <p>There is, for example, mention of some alternative cooling theory. However, that research only will finish by 2023, and by then we obviously be very deep into the project. So, a little bit of calm on actually racing to build this until we really understand the negative implications that can come in. Are really the whales threatened? It looks like they might be.</p>	<p>Thank you for your comment.</p>

Comment No.	Comment	Response
	<p>Well, why don't we actually really figure that out instead of saying, well, it appears that maybe, yeah, there was a connection. We don't know. We have the know-how to actually figure out these things. And I don't think it's being applied with equal enthusiasm compared to the enthusiasm of just building these things.</p> <p>That would be the extent of my comment.</p>	
<p>BOEM-2022-0071-0282-0011</p>	<p>My name is Constance Gee. C- O- N- S- T- A- N- C- E. Last name Gee, G- E- E. I had not -- I have nothing prepared. I had just tuned in to listen to this. This is the first time I've had the privilege of -- of listening to this sort of hearing. I live right at the Rhode Island- Massachusetts Border right on the water. And as I listen to the previous speakers, it seems like people have a lot to say that represent big organizations or universities that have been doing a lot of work with Ørsted and probably have taken money from Ørsted in some way or the other. And -- and they have nothing to say, but great things! And I've heard a speaker say that this idea of - that is going to -- that more fish are going to enjoy the area because of the -- because of the reefs, the artificial reefs that each one of the monopoles will -- will form. Oh, that that's a scientifically proven fact. I don't really think that's true. I think a lot of things that are being said tonight and everybody's patting each other on the back about it. I don't think a lot of this is proven. I don't think there's a lot of good studies that have been done as the previous speaker was saying about what is happening with the whale deaths. Yes, I know that there has been a large amount of whale deaths over the past few years, but not in that particular area where I do believe that there was sonar testing going on, looking for cabling, where they're going to put the cabling and the monopoles. So, it's just -- it's moving very fast.</p> <p>Also, the -- I'm concerned about the open water- cooling system. A previous speaker said that you had those in New York at a coal plant, power plant, and those would be closed down. Well but it's going to be moved over to Rhode Island. It seems to me like this should be a lot closer to New York than it is if the energy is going to New York. I'm sorry, I don't mean to be NIMBY here. I know that's a big charge, but I'd like to know more if you could tell us more about the open water- cooling system, the 8 million gallons of water it takes in every day and spews back out at what 90 degrees or something? I mean it's -- but we are changing the environment out</p>	<p>Thank you for your comment.</p>



Comment No.	Comment	Response
	<p>in our ocean at an incredible breakneck speed, especially as we put up thousands of these huge offshore wind turbines and all of the cabling that goes with it and the cooling systems. It just seems like we're doing it so fast and we're really not hearing adequate environmental impact studies about how it's going to affect marine life.</p> <p>So, I have great concerns as an individual citizen not representing any company, but thinking who speaks for -- who speaks for the ocean, who speaks for the whales, who speaks for the ocean?</p> <p>Everybody is just talking about, oh, it's going to be great economically, we're going to make this money. You know, we're all in for it. But I would just like to raise my hand to say I have some real concerns, and I think a lot of people do especially those of us who are going to be looking at about 2,000 of them off the shore and in the Rhode Island sound, and right in the middle of the most important winter- feeding ground for the North Atlantic right whale.</p> <p>So that's the extent of my comments but I have true concerns over this, and it breaks my heart to see how fast and furious everybody is going at this, who's going to make some money.</p>	
<p>BOEM-2022-0071-0283-0007</p>	<p>Okay, great. My name is Bonnie Brady. It's spelled exactly like it is in the chat. B- O- N- N- I- E, Brady B- R- A- D- Y. I'm the executive director of the Long Island Commercial Fishing Association. I'm sorry, someone put my hand down after I had raised it, so I'm sorry for the problem. Now, I guess we start the clock going now.</p> <p>We are not in support of this project seriousness in anything that could affect the population level of Southern New England Cod stocks. I'm going to refer to the letter that you all had received regarding the South Fork project, which is right next door to Revolution Wind, and is only about one- seventh of the size of what revolution is but the issues are specifically regarding this, that the pile driving, the sound, the unbound effect it's going to have on future responding behavior.</p> <p>Anyway, I don't know who that was. In a letter that was sent to James Bennett on October</p>	<p>Thank you for your comment.</p>

Comment No.	Comment	Response
	<p>25th of 2021, it specifically discussed BOEM" s response to NOAA"s EFH conservation recommendations for the South Fork Project, which is right next door. And it spoke specifically that this project and other -- other sources that are going to be for other wind farms have a high risk of population-level impacts on Southern New England Cod.</p> <p>It states the fact that BOEM did not listen to the time of year recommendations regarding, I believe protecting spawning cod on Cox" s Ledge. It stated that acoustic masking was the only environmental stressor that BOEM stated and that it " ceases as soon as the noise source stops," which is not true according to the National and Fisheries service. As they said, no support was provided for that conclusion, and the conclusion did not appear to be supported by peer review literature.</p> <p>Specifically, also it refers to the fact that there was an assumption by BOEM that no lingering effect and minimal impacts to Cod" s spawning aggregations that was inconsistent with the assessment of impacts that you presented for the Suffolk Plan, and for this DEIS, it seems to have been copied into it. There is a severe concern that not only by doing the initial work, which included bulldozing the ocean floor with the Ospate 400 (sic) destroying possibly centuries of glacial marine, pile driving, the larvae, and keeping the spawning cod out of the area could lose one of the last somewhat healthy stocks of codfish that we have in New England. Additionally, I heard Ms. Lapp refer to the cooling water intake system. It is kind of ironic that Joe Martens, who was the commissioner of the Department of Environmental Conservation during that time period, was the one that put a law forward that made it illegal to have any type of cooling water intake system that was an open system, and that they had to be completely closed. They were going to be made illegal in all New York land and or those that draw water, as in, I believe Caithness. So, you" re planning on taking 8.1 million gallons per day, sucking it out, and spitting it out as 90 -degree effluent in the water column where areas of water don't necessarily mix. And then the area of, I believe, 94 turbines, forgive me if I'm off by one or two, with the now documented wind wake effects, which actually can warm sea surface temperature. And additionally, take place up to 60 kilometers behind the site with warming of sea surface temperature, and a decrease in upwelling and downwelling.</p>	

Comment No.	Comment	Response
	<p>I find it shocking that none of the other environmental organizations have taken the time past the rudimentary climate change issues to look about thinking globally, but acting locally when it comes to this project. We do not support it. Thank you.</p>	
<p>BOEM-2022-0071-0283-0010</p>	<p>Sure. My name is Blair Bailey. I'm the General Counsel to the New Bedford Port Authority. It's B- L- A- I- R, Bailey, B- A- I- L- E- Y. I'd just like to make a couple comments on the -- on the EIS.</p> <p>First, a couple general comments. As was noted at the beginning of this, there are now 27 active leases for offshore wind areas in the Atlantic. And we still don't have fisheries mitigation guidance from BOEM.</p> <p>The first mitigation document that BOEM put out was in 2012, now we're considerably later and we still don't have the document. As a more specific comment, there's a couple of things. This is the second EIS that I've seen lately from BOEM where the evaluation of the No- action Alternative essentially says that doing nothing is going to have the same impact on commercial fishing as building the turbines. And the reason given for that is essentially all the other areas that BOEM has already approved, combined with NOAA fishing regulations, combined with global warming, fishing essentially is going to have -- have the same downfall as constructing 94 turbines in this area. With all due respect to BOEM, it's a little self- serving to approve an environmental impact statement and say the No Impact Alternative is exactly the same as the BOEM because we've already approved other wind areas. The other observation I would make is, as far as fisheries mitigation goes, and I put a question in -- in the -- in the questions, I know there's reference to a fisheries mitigation plan. I haven't been able to find it. It's not -- it's referenced in the -- in Appendix H in the mitigation under the -- the EIS as not an enforceable part of it.</p> <p>And then BOEM goes on to say that there will be a fisheries mitigation compensation fund consistent with the draft guidance that was submitted, or as it may be amended and as I said, it's -- it's still not out yet, so we don't know what that's going to look like at the end of the</p>	<p>Thank you for your comment.</p>

Comment No.	Comment	Response
	<p>day. But there's no fisheries mitigation plan attached to the COP that I can see. The only reference anywhere is that it's somehow available on the NYSERDA website. Just by way of reference as to who New Bedford, who we are here, we're essentially the port that's going to be most impacted by -- by any of the impact on the -- on the scallop fishery and other fisheries. We'll have 33 percent of the revenue from this particular area and most of the revenue from every other area in the New York Bight area. We bring in half a billion dollars a year in fisheries revenue and it's very concerning to us that while the race to put in offshore wind moves forward, there really isn't a lot of consideration given to the impact of lost revenue to both the fishermen and the ports that rely on these fishermen, the -- the shoreside businesses, the people employed by both the fishing industry and the shoreside businesses.</p> <p>So, my observation is the EIS doesn't really go far enough into requiring the mitigation that needs to happen. And that's -- that's it. Thank you.</p>	
BOEM-2022-0071-0284-0003	<p>Okay. Carl Van Warmerdam, C- A- R- L, V- A- N, W- A- R- M- E- R- D- A- M.</p> <p>I'm an advocate for the North Atlantic right whale, which there are 350 members left alive, whose only home is in the outer continental shelf of the eastern seaboard, which is where thousands of wind turbines are planned on being built. So, I'll start with what I stated yesterday, which is there's no section in this DEIS for the North Atlantic right whale, which is critically endangered, the most critically endangered whale, and one of the most imperiled mammals on the planet. Thankfully, we have sea turtles, which are included, which are also critically endangered. That needs to be rectified, they should have their own section, and it should encompass the Draft BOEM NOAA strategy for the North Atlantic right whale that needs to be incorporated into this DEIS. Now, on the table ES- 2 , which is the summary, comparison of the impacts between alternatives with no mitigation measures, you've gone down the list and I don't -- I cannot understand how there's no difference if you take butts, there's no, no difference along any of the alternatives. They're all minor. That's illogical. And it goes down the list too. When there's no alternative, it's still stated as minor when there should be no effect.</p>	Thank you for your comment.

Comment No.	Comment	Response
	<p>Now, I know you're taking into consideration climate change, but are you taking into the consideration of what it costs to build these turbines on climate change, the materials that will need to be mined and manufactured, the habitat that will be destroyed in their making, the Balsa wood forests that will need to be cut to get those wind blades. Those all need to be calculated. And if you're calculating climate change, those would definitely be offset. So all the -- you know, wind, wind is a renewable easy resource, correct. But the turbines that capture that energy are not. They're not clean, they're not green. They're, they're constructed and manufactured and use fossil fuel to produce. They will not eliminate carbon use, they will only add onto it. In the 50 years of renewable energy, carbon emissions have only increased. They're still increasing. If we want to decrease CO 2 emissions, we need to stop using fossil fuels. That means limiting air travel. No cruise line ships, cars. It doesn't matter what powers the car. You're still using metal that needs to be mined, which uses fossil fuels. The plants use fossil fuels. Those cars, whether they're electric or ICE, have wheels and tires. Where do those come from? So that all needs to be calculated in and should be figured into your scenarios. So, finishing up here, I really advise a no alternative on industrialization of our commons and the -- of what I would -- would say is extinction for the species of the right whale, they will destroy the zooplankton upon which they live and their only home. Thank you.</p>	

**O.7.3. Form Letters**

**Table O-36. Form Letter Comments**

Comment IDs	Comment	Response
<p>BOEM-2022-0071-0021 BOEM-2022-0071-0026 BOEM-2022-0071-0054 BOEM-2022-0071-0053 BOEM-2022-0071-0067 BOEM-2022-0071-0068 BOEM-2022-0071-0069 BOEM-2022-0071-0126</p>	<p>As a union member, I support offshore wind. Large scale utility development like Sunrise Wind and other offshore wind projects will not only reduce our carbon footprint but will also mean a tremendous amount of economic opportunity in the form of jobs and economic benefits. I strongly believe that Americans should not have to choose between a good job and a clean environment – we can and must have both. Orsted and Eversource’s Sunrise Wind project is an opportunity to not only drive the nation’s clean energy future, but create quality, family sustaining jobs at the same time. I urge BOEM to move forward with BOEM’s permitting process.</p>	<p>Thank you for your comment of support.</p>
<p>BOEM-2022-0071-0032 BOEM-2022-0071-0033 BOEM-2022-0071-0036 BOEM-2022-0071-0046 BOEM-2022-0071-0048 BOEM-2022-0071-0139 BOEM-2022-0071-0148 BOEM-2022-0071-0230</p>	<p>As a resident of Greenport, NY, I support offshore wind and the Sunrise Wind project in particular. This project will create hundreds of jobs in NY and generate immense investment in the state. I support this project for the clean energy and opportunity it will create.</p>	<p>Thank you for your comment of support.</p>

Comment IDs	Comment	Response
<p>BOEM-2022-0071-0110 BOEM-2022-0071-0115 BOEM-2022-0071-0038 BOEM-2022-0071-0182 BOEM-2022-0071-0250 BOEM-2022-0071-0056</p>	<p>The advance of offshore wind is critical to achieving our clean energy goals and creating a healthier future for our children. As a resident of Lindenhurst, NY I write to urge BOEM to approve the permit application for Sunrise Wind so that we can begin to realize the benefits of this regionally significant clean energy project as soon as possible. We can't fight climate change without transitioning away from fossil fuels to renewable energy.</p>	<p>Thank you for your comment of support.</p>
<p>BOEM-2022-0071-0045 BOEM-2022-0071-0070 BOEM-2022-0071-0083 BOEM-2022-0071-0092 BOEM-2022-0071-0094 BOEM-2022-0071-0097 BOEM-2022-0071-0106 BOEM-2022-0071-0120 BOEM-2022-0071-0221 BOEM-2022-0071-0240 BOEM-2022-0071-0241 BOEM-2022-0071-0281</p>	<p>As a resident of New York, I support offshore wind and the Sunrise Wind project. This project will help New York transition from fossil fuels to renewable energy and create hundreds of jobs. It will be located over 30 miles offshore and connect in Brookhaven to bring renewable energy directly to 600,000 Long Island homes. I support this project because clean energy is important.</p>	<p>Thank you for your comment of support.</p>

Comment IDs	Comment	Response
<p>BOEM-2022-0071-0060 BOEM-2022-0071-0066 BOEM-2022-0071-0125 BOEM-2022-0071-0145 BOEM-2022-0071-0153 BOEM-2022-0071-0156 BOEM-2022-0071-0162 BOEM-2022-0071-0164 BOEM-2022-0071-0181 BOEM-2022-0071-0191 BOEM-2022-0071-0202 BOEM-2022-0071-0212 BOEM-2022-0071-0217 BOEM-2022-0071-0219 BOEM-2022-0071-0237 BOEM-2022-0071-0258 BOEM-2022-0071-0260 BOEM-2022-0071-0261</p>	<p>write in support of Sunrise Wind. Offshore wind projects are critical to solving today's environmental challenges in ways that both create and maintain quality jobs to build a stronger, fairer economy.</p> <p>Sunrise Wind alone is investing hundreds of millions of dollars in New York that will create hundreds of union jobs around the state. And once complete, the project will power more than 600,000 homes annually with clean energy.</p> <p>Orsted and Eversource, the project developers, have signed a Project Labor Agreement with the North American Building Trades and Local Building Trades Councils to ensure their projects will be built with local union labor. This important agreement gives us confidence that Sunrise Wind will be constructed under fair and equitable terms for members of our union family.</p> <p>I urge BOEM to support the approval of Sunrise Wind so that we may get to work, and many more residents can begin to realize the multi-faceted benefits of this important project.</p>	<p>Thank you for your comment of support.</p>



Comment IDs	Comment	Response
<p>BOEM-2022-0071-0063 BOEM-2022-0071-0064 BOEM-2022-0071-0127 BOEM-2022-0071-0154 BOEM-2022-0071-0170 BOEM-2022-0071-0173 BOEM-2022-0071-0174 BOEM-2022-0071-0190 BOEM-2022-0071-0199 BOEM-2022-0071-0204 BOEM-2022-0071-0210 BOEM-2022-0071-0220 BOEM-2022-0071-0224 BOEM-2022-0071-0225 BOEM-2022-0071-0228 BOEM-2022-0071-0234</p>	<p>I write in support of Sunrise Wind. Offshore wind projects are critical to solving today's environmental challenges in ways that both create and maintain quality jobs to build a stronger, fairer economy.</p>	<p>Thank you for your comment of support.</p>
<p>BOEM-2022-0071-0157 BOEM-2022-0071-0168 BOEM-2022-0071-0175 BOEM-2022-0071-0185 BOEM-2022-0071-0189 BOEM-2022-0071-0197 BOEM-2022-0071-0231 BOEM-2022-0071-0259</p>	<p>Sunrise Wind alone is investing hundreds of millions of dollars in New York that will create hundreds of union jobs around the state. And once complete, the project will power more than 600,000 homes annually with clean energy.</p>	<p>Thank you for your comment.</p>

Comment IDs	Comment	Response
BOEM-2022-0071-0269 BOEM-2022-0071-0270 BOEM-2022-0071-0271 BOEM-2022-0071-0272 BOEM-2022-0071-0273 BOEM-2022-0071-0274 BOEM-2022-0071-0275	I fully support the Sunrise Wind project. This offshore wind farm will move us forward in the creation of sustainable energy alternatives. Future generations depend on such efforts to combat climate change.	Thank you for your comment of support.

## O.8. List of Commenters by Commenter Type and Submission Number

**Table O-37. Federal Agencies**

Submission ID	Commenter	Agency
BOEM-2022-0071-0167	John M. Mauger	U.S. Coast Guard
BOEM-2022-0071-0255	Jonathan Meade	U.S. Dep of the Interior, National Park Service
BOEM-2022-0071-0256	Michael Pentony	NOAA
BOEM-2022-0071-0171	Timothy Timmermann	U.S. Environmental Protection Agency

**Table O-38. State Government**

Submission ID	Commenter	Government Organization
BOEM-2022-0071-0194	Lisa Berry Engler	The Massachusetts Office of Coastal Zone Management
BOEM-2022-0071-0244	Terrence Gray	Rhode Island Department of Environmental Management
BOEM-2022-0071-0245	Kisha Santiago, Sean Mahar and Tom Alworth	New York State Dep. of Environmental Conservation, New York State Dep. of State, New York State Office of Parks, Recreation, and Historic Preservation
BOEM-2022-0071-0257	Thomas McIntyre	New York Department of Transportation

**Table O-39. Businesses and Organizations**

Submission ID	Commenter	Organization
BOEM-2022-0071-0002	ECONcrete	ECONcrete
BOEM-2022-0071-0008	Relic	Relic
BOEM-2022-0071-0010	Brienne Ahearn	The Butterfly Effect Project
BOEM-2022-0071-0017	Deep Sea Defenders	Deep Sea Defenders
BOEM-2022-0071-0018	Woods Hole Group Inc.	Woods Hole Group Inc.
BOEM-2022-0071-0019	Local 338 RWDSU/UFCW	Local 338 RWDSU/UFCW
BOEM-2022-0071-0022	Global Maritime	Global Maritime
BOEM-2022-0071-0023	Matthew Aracich	Building and Construction Trades Council of Nassau and Suffolk Counties
BOEM-2022-0071-0024	Robert Mearini	Alpine Ocean Seismic Survey, Inc.
BOEM-2022-0071-0029	Michael Tosi	HeliService USA LLC
BOEM-2022-0071-0031	Brian Vahey	American Waterways Operators
BOEM-2022-0071-0034	Dino Chouest	Edison Chouest Offshore and its family of affiliated companies
BOEM-2022-0071-0035	CWA Local 1109	CWA Local 1109
BOEM-2022-0071-0041	The New York League of Conservation Voters	The New York League of Conservation Voters
BOEM-2022-0071-0044	Kenneth (KC) Sahl	VHB
BOEM-2022-0071-0050	IBEW local 25	IBEW local 25
BOEM-2022-0071-0054	CSEA Local 330	CSEA Local 330
BOEM-2022-0071-0055	CSEA Local 330	CSEA Local 330
BOEM-2022-0071-0060	Randall Lambert	Millwrights Local 1163
BOEM-2022-0071-0061	Stanley Koniszewski III	Teamsters Local 294
BOEM-2022-0071-0062	Paul Nylin	IBEW Local 236

Submission ID	Commenter	Organization
BOEM-2022-0071-0063	IBEW LU#236	IBEW LU#236
BOEM-2022-0071-0064	Sheet Metal Workers SMART Local 83	Sheet Metal Workers SMART Local 83
BOEM-2022-0071-0065	Citizens Campaign for the Environment	Citizens Campaign for the Environment
BOEM-2022-0071-0066	Pat Tirino	BAC 2 NY/VT
BOEM-2022-0071-0068	District Council 9 Painters and Allied Trades	District Council 9 Painters and Allied Trades
BOEM-2022-0071-0069	Teamsters Local 1205	Teamsters Local 1205
BOEM-2022-0071-0070	Institute for Workforce Advancement	Institute for Workforce Advancement
BOEM-2022-0071-0071	Alvin Ramnarain	Local 1102 RWDSU/UFCW
BOEM-2022-0071-0072	Michael Gendron	Communications Workers of America 1109
BOEM-2022-0071-0074	Laura Lear	Vaisala
BOEM-2022-0071-0079	Jared Dent	Boskalis Offshore
BOEM-2022-0071-0081	Clark Buffam	American Offshore Services
BOEM-2022-0071-0086	Long Island Contractors' Association	Long Island Contractors' Association
BOEM-2022-0071-0087	Matthew T. Ferris	Arvos Ljungstrom LLC.
BOEM-2022-0071-0093	Green Energy Technology by JGM LLC	Green Energy Technology by JGM LLC
BOEM-2022-0071-0111	Maxwell Hall	Fisheries Liaison Officer
BOEM-2022-0071-0125	Roofers, Waterproofers Union Local 241	Individual Roofers, Waterproofers Union Local 241
BOEM-2022-0071-0126	Sean Moran	Laborers Local 190
BOEM-2022-0071-0127	Laborers Local 190	Laborers Local 190
BOEM-2022-0071-0133	Kevin Cawley	Thomas Berry Forum for Ecological Dialogue at Iona University
BOEM-2022-0071-0138	Stephen M. Zemaitatis Jr.	Riggs Distler & Company, Inc.
BOEM-2022-0071-0142	Dennis C. Affinati	IBEW - International Brotherhood of Electrical Workers - Third District

Submission ID	Commenter	Organization
BOEM-2022-0071-0145	Anthony Villa	Carpenters Local 290
BOEM-2022-0071-0147	Katie Almeida	The Town Dock
BOEM-2022-0071-0152	William Hougland	Haugland Group LLC
BOEM-2022-0071-0154	Chris Dugan	Carpenters Union Local 291
BOEM-2022-0071-0155	Lee Gooderham	Ordtek Limited
BOEM-2022-0071-0157	Zach Middleton	Millwrights Local 1163
BOEM-2022-0071-0158	Thomas A. Nies and Christopher M. Moore	New England and Mid-Atlantic Fishery Management Councils
BOEM-2022-0071-0159	Jim Murphy	New York State carpenters local to 91
BOEM-2022-0071-0161	Bryan Lohr	NYS Carpenters Union
BOEM-2022-0071-0163	Thaddeus Sendall	NYS Carpenters Union
BOEM-2022-0071-0165	Biofuel antagonists Global	Biofuel antagonists Global
BOEM-2022-0071-0166	Transport Workers Union Local 252	Transport Workers Union Local 253
BOEM-2022-0071-0170	Sarah Ferguson	IUOE Local 158
BOEM-2022-0071-0172	Timothy Midgette	NYS Carpenters Union
BOEM-2022-0071-0173	Michael Clifford	NYS Carpenters Union
BOEM-2022-0071-0174	North Atlantic States Regional Council of Carpenters	North Atlantic States Regional Council of Carpenters
BOEM-2022-0071-0176	Anthony Tubolino	International Operating Engineers Local 158
BOEM-2022-0071-0178	Daniel Reis	IBEW local 25
BOEM-2022-0071-0183	Andrew Raspanti	NYS Carpenters Union
BOEM-2022-0071-0186	Wilberto Arman	IBEW local 25
BOEM-2022-0071-0188	Tommy S.	IBEW local 25
BOEM-2022-0071-0192	Climate Jobs New York	Climate Jobs New York
BOEM-2022-0071-0195	Lenore Friedlaender	Climate Jobs New York

Submission ID	Commenter	Organization
BOEM-2022-0071-0198	Gordon M. Carr	New Bedford Port Authority Comment Letter
BOEM-2022-0071-0199	Edward Donlon	NYS Carpenters Union
BOEM-2022-0071-0200	Sierra Club	Sierra Club
BOEM-2022-0071-0203	Kerry Merkle	NYS Carpenters Union
BOEM-2022-0071-0204	Scott Griffith	NYS Carpenters Union
BOEM-2022-0071-0205	Jason Walsh	BlueGreen Alliance
BOEM-2022-0071-0206	Ross Gould	Business Network for Offshore Wind
BOEM-2022-0071-0207	Durwin Young	NYS Carpenters Union
BOEM-2022-0071-0208	Brian Wagner	Electricians Local #25
BOEM-2022-0071-0209	Renewable Energy Long Island (reLI)	Renewable Energy Long Island (reLI)
BOEM-2022-0071-0220	Joseph Brosnan	IBEW local 25
BOEM-2022-0071-0222	David Meers	NYS Carpenters Union
BOEM-2022-0071-0223	Marie Boyle	NEW YORK NURSING ASSOCIATION
BOEM-2022-0071-0224	William Drlfosse	NYS Carpenters Union
BOEM-2022-0071-0225	Robert Blaney	local union#25 Ives
BOEM-2022-0071-0226	Ryan Chaytors	Sunrise Wind LLC
BOEM-2022-0071-0227	Chris Lindsey and Andrew Dimitriou	SLR Consulting US LLC
BOEM-2022-0071-0228	Richard DiMitri	IBEW local 25
BOEM-2022-0071-0229	Meghan Lapp	Seafreeze Shoreside and Seafreeze Ltd.
BOEM-2022-0071-0232	Lisa Knight	Green Oceans
BOEM-2022-0071-0233	William W Czaikowski	local 25
BOEM-2022-0071-0234	Sam and Daniel Cordova	local 25
BOEM-2022-0071-0237	Timothy Morris	NYS Carpenters Union
BOEM-2022-0071-0238	HealthyPlanet	HealthyPlanet

Submission ID	Commenter	Organization
BOEM-2022-0071-0242	National Wildlife Federation, Natural Resources Defense Council, Conservation Law Foundation, et al.	National Wildlife Federation, Natural Resources Defense Council, Conservation Law Foundation, et al.
BOEM-2022-0071-0247	Andrew Cooper	Fugro
BOEM-2022-0071-0248	Lane Johnston	Responsible Offshore Development Alliance
BOEM-2022-0071-0249	William J. Cook	City of Newport, Newport Restoration Foundation, Preservation Society of Newport County, Salve Regina University, Town of New Shoreham, and Southeast Lighthouse Foundation
BOEM-2022-0071-0251	Bonnie Brady	Long Island Commercial Fishing Association
BOEM-2022-0071-0253	Billy Subject	NYS Carpenters Union
BOEM-2022-0071-0254	Finger Lakes	Finger Lakes
BOEM-2022-0071-0258	Anonymous	IBEW local 25
BOEM-2022-0071-0259	Anonymous	IBEW local 25
BOEM-2022-0071-0260	Anonymous	IBEW local 25
BOEM-2022-0071-0261	Anonymous	IBEW local 25
BOEM-2022-0071-0282-0002	Laura Fabrizio	Moriches Bay Project
BOEM-2022-0071-0282-0004	Helen Torkos	Chamber of Commerce
BOEM-2022-0071-0282-0005	George Povall	All Our Energy
BOEM-2022-0071-0282-0006	Maura Spery	Mastic Beach Conservancy
BOEM-2022-0071-0282-0007	Adrienne Esposito	Citizens Campaign for the Environment
BOEM-2022-0071-0282-0008	Mike Conroy	Responsible Offshore Development Alliance
BOEM-2022-0071-0282-0014	Adrienne Esposito	Adrienne Esposito
BOEM-2022-0071-0283-0001	Meghan Lapp	Seafreeze



Submission ID	Commenter	Organization
BOEM-2022-0071-0283-0002	Casey Petrashek	New York League of Conservation Voters
BOEM-2022-0071-0283-0003	Beth Wahl	President of the William Floyd Community Summit
BOEM-2022-0071-0283-0004	Nicole DiPaolo	Bluegreen Alliance
BOEM-2022-0071-0283-0005	Katie Cubina	Mystic Aquarium
BOEM-2022-0071-0283-0006	Stacy Sikes	VP of Gov Affairs and Communication at Long Island Association
BOEM-2022-0071-0283-0007	Bonnie Brady	Long Island Commercial Fishing Association
BOEM-2022-0071-0283-0008	Daniel Busi	Renewable Energy Long Island
BOEM-2022-0071-0283-0010	Blair Bailey	General Counsel to the New Bedford Port Authority
BOEM-2022-0071-0283-0011	Roger Clayman	Long Island Federation of Labor AFL-CIO
BOEM-2022-0071-0283-0012	Adrienne Esposito	Citizens Campaign for the Environment
BOEM-2022-0071-0284-0002	Fred Zalcman	New York Offshore Wind Alliance

**Table O-40. Individuals**

Submission ID	Commenter	Other Applicable Information
BOEM-2022-0071-0003	Aram Terchunian	
BOEM-2022-0071-0004	Eleanor Kobel	
BOEM-2022-0071-0005	Zeb Youngman	
BOEM-2022-0071-0006	Michael Daly	
BOEM-2022-0071-0007	William Tymann	
BOEM-2022-0071-0009	Alex Kravitz	
BOEM-2022-0071-0011	Aiden Kravitz	
BOEM-2022-0071-0012-0001	Kelsie Linell	
BOEM-2022-0071-0012-0002	Matt Linnell	
BOEM-2022-0071-0012-0003	Cpt. Robert Cabral	
BOEM-2022-0071-0012-0004	Robert Groves	
BOEM-2022-0071-0012-0005	Cpt. Scott Dernberger	
BOEM-2022-0071-0012-0006	Cpt. Scott Yerman	
BOEM-2022-0071-0012-0007	Tim Linell	
BOEM-2022-0071-0012-0008	Cpt. CJ Pinto	
BOEM-2022-0071-0012-0009	Gary Yerman	
BOEM-2022-0071-0013	Michelle Jones	
BOEM-2022-0071-0014	Patrice Tullai	
BOEM-2022-0071-0015	Bill Hoover	
BOEM-2022-0071-0016	Susan Goldberg	
BOEM-2022-0071-0020	Walter Barton	
BOEM-2022-0071-0021	Nick Hoh	
BOEM-2022-0071-0025	John Marks	

Submission ID	Commenter	Other Applicable Information
BOEM-2022-0071-0026	Kevin Kernan	
BOEM-2022-0071-0027	Kevin Kernan	Duplicate comment to BOEM-2022-0071-0026
BOEM-2022-0071-0028	Esther Hernandez-Kramer	
BOEM-2022-0071-0030	Brian Tymann	
BOEM-2022-0071-0032	David Kapell	
BOEM-2022-0071-0033	Patricia Feeley	
BOEM-2022-0071-0036	Eileen Kapell	
BOEM-2022-0071-0037	Stephen Morvillo	
BOEM-2022-0071-0038	Paul Eidman	
BOEM-2022-0071-0039	Celeste Tymann	
BOEM-2022-0071-0040	Michael Hansen	
BOEM-2022-0071-0042	SM B	
BOEM-2022-0071-0043	Lucas Rodriguez	
BOEM-2022-0071-0045	Patricia Harper	
BOEM-2022-0071-0046	Caitlin Kapell	
BOEM-2022-0071-0047	Joseph Lopes	
BOEM-2022-0071-0048	Kathryn Kapell	
BOEM-2022-0071-0049	Timothy McCarthy	
BOEM-2022-0071-0051	Joseph O. Kommer	
BOEM-2022-0071-0052	Sean Meehan	
BOEM-2022-0071-0053	Kevin Casey	
BOEM-2022-0071-0056	Robin Spiegelman	
BOEM-2022-0071-0057	Lawrence Germano	
BOEM-2022-0071-0058	Thomas Lawless	

Submission ID	Commenter	Other Applicable Information
BOEM-2022-0071-0059	James Pena	
BOEM-2022-0071-0067	Vanessa Jones	
BOEM-2022-0071-0073	Adelaide Fenton	
BOEM-2022-0071-0075	Jeffrey Stark	
BOEM-2022-0071-0076	Austin Martin	
BOEM-2022-0071-0077	Lewis Gross	
BOEM-2022-0071-0078	Peter McCartt	
BOEM-2022-0071-0080	Kevin McAleer	
BOEM-2022-0071-0082	Harish Yerramsetty	
BOEM-2022-0071-0083	Vincent Vertuccio	
BOEM-2022-0071-0084	Versha Gupta	
BOEM-2022-0071-0085	Pete Friedrich	
BOEM-2022-0071-0088	Marilyn Van Scoyoc	
BOEM-2022-0071-0089	Renee Toback	
BOEM-2022-0071-0090	Billy Mack	
BOEM-2022-0071-0091	Jack Polonka	
BOEM-2022-0071-0092	Madeleine Glick	
BOEM-2022-0071-0094	Joslyn Pine	
BOEM-2022-0071-0095	Peter Louis	
BOEM-2022-0071-0096	Mary Eagleson	
BOEM-2022-0071-0097	Kelly DeVine	
BOEM-2022-0071-0098	Kevin Grimes	
BOEM-2022-0071-0099	Patricia Brack	
BOEM-2022-0071-0100	Sherry Sass	

Submission ID	Commenter	Other Applicable Information
BOEM-2022-0071-0101	Kevin McGirr	
BOEM-2022-0071-0102	Raymond LeCann	
BOEM-2022-0071-0103	Donna Creagh	
BOEM-2022-0071-0104	Zoe Strassfield	
BOEM-2022-0071-0105	Malarie McGinnis	
BOEM-2022-0071-0106	Jennifer Valentine	
BOEM-2022-0071-0107	Alphonse Leonette	
BOEM-2022-0071-0108	Jennifer Wootton	
BOEM-2022-0071-0109	Liberty Howell	
BOEM-2022-0071-0110	Kerstin Bongiovi	
BOEM-2022-0071-0112	Susan Bonadonna	
BOEM-2022-0071-0113	Nancy Bolan	
BOEM-2022-0071-0114	Lisa Tymann	
BOEM-2022-0071-0115	William Doyle	
BOEM-2022-0071-0116	JodyAnn Weinman	
BOEM-2022-0071-0117	Julie Barnes	
BOEM-2022-0071-0118	Barbara Karyo	
BOEM-2022-0071-0119	Debra Engelhardt	
BOEM-2022-0071-0120	Elizabeth Stack	
BOEM-2022-0071-0121	Ike Rauth	
BOEM-2022-0071-0122	Daniel Busi	
BOEM-2022-0071-0123	Jessica Tierney	
BOEM-2022-0071-0124	Clifford and Pearl Bove	
BOEM-2022-0071-0128	Virginia Matney	

Submission ID	Commenter	Other Applicable Information
BOEM-2022-0071-0129	Felicia Metcalf	
BOEM-2022-0071-0130	John Van Sickle	
BOEM-2022-0071-0131	Richard Galli	
BOEM-2022-0071-0132	Jonathan Foster	
BOEM-2022-0071-0134	Amy Ziff	
BOEM-2022-0071-0135	Josh Lehman	
BOEM-2022-0071-0136	Jim Johnson	
BOEM-2022-0071-0137	Mary Troland	
BOEM-2022-0071-0139	Joshua Kapell	
BOEM-2022-0071-0140	Elizabeth Halliday	
BOEM-2022-0071-0141	Robert Berkowitz	
BOEM-2022-0071-0143	Anna Gedrich	
BOEM-2022-0071-0144	Steve Hopkins	
BOEM-2022-0071-0146	Frances Cerra Whittelsey	
BOEM-2022-0071-0148	Matthew Kapell	
BOEM-2022-0071-0149	Melanie Carnsew	
BOEM-2022-0071-0150	William and Jane Flinter	
BOEM-2022-0071-0151	April Thayer	
BOEM-2022-0071-0153	Scott Smith	
BOEM-2022-0071-0156	Jim Mason	
BOEM-2022-0071-0160	Peter Derkevics	
BOEM-2022-0071-0162	Alvin Sumpter	
BOEM-2022-0071-0164	Thomas Scheg	
BOEM-2022-0071-0168	Terry Middleton	

Submission ID	Commenter	Other Applicable Information
BOEM-2022-0071-0169	Edwin Hill Jr	
BOEM-2022-0071-0175	David Strum	
BOEM-2022-0071-0177	Kevin Owen	
BOEM-2022-0071-0179	Carl Maurer	
BOEM-2022-0071-0180	John Buckheit	
BOEM-2022-0071-0181	John Casciano	
BOEM-2022-0071-0182	Susan Haynes	
BOEM-2022-0071-0184	John Clifford	
BOEM-2022-0071-0185	Brian Biche	
BOEM-2022-0071-0187	Kerri Tymann	
BOEM-2022-0071-0189	Kenneth Madore	
BOEM-2022-0071-0190	Jared Carroll	
BOEM-2022-0071-0191	Christian Worhle	
BOEM-2022-0071-0193	Kevin Halpin	
BOEM-2022-0071-0196	Brian Chebuske	
BOEM-2022-0071-0197	Nicole Grodner	
BOEM-2022-0071-0201	Helen Lawrence	
BOEM-2022-0071-0202	Michael Riello	
BOEM-2022-0071-0210	Joseph Berdini	
BOEM-2022-0071-0211	Brian Schinella	
BOEM-2022-0071-0212	Thomas Savino	
BOEM-2022-0071-0213	A.J. Cordero	
BOEM-2022-0071-0214	James Dellamore	
BOEM-2022-0071-0215	Dennis Current	

Submission ID	Commenter	Other Applicable Information
BOEM-2022-0071-0216	C O F	
BOEM-2022-0071-0217	Michael Sweeney	
BOEM-2022-0071-0218	Chris Callahan	
BOEM-2022-0071-0219	Biggie Lyons	
BOEM-2022-0071-0221	Terri Brady	
BOEM-2022-0071-0230	Diana Gordon	
BOEM-2022-0071-0231	David Cordova	
BOEM-2022-0071-0235	Tom Albert	
BOEM-2022-0071-0236	Thomas Reichard	
BOEM-2022-0071-0239	William Adams	
BOEM-2022-0071-0240	Deborah Lombardi-Aiello	
BOEM-2022-0071-0241	Deborah Lombardi-Aiello	Duplicate comment to BOEM-2022-0071-0240
BOEM-2022-0071-0243	Daniel Sterk	
BOEM-2022-0071-0246	Mary Bridget Bohan	
BOEM-2022-0071-0250	B Ruth Montgomery	
BOEM-2022-0071-0252	Forrest Barnett	
BOEM-2022-0071-0262	Anonymous	
BOEM-2022-0071-0263	Anonymous	
BOEM-2022-0071-0264	Anonymous	
BOEM-2022-0071-0265	Anonymous	
BOEM-2022-0071-0266	Anonymous	
BOEM-2022-0071-0267	Anonymous	
BOEM-2022-0071-0268	Anonymous	
BOEM-2022-0071-0269	Anonymous	



Submission ID	Commenter	Other Applicable Information
BOEM-2022-0071-0270	Anonymous	
BOEM-2022-0071-0271	Anonymous	
BOEM-2022-0071-0272	Anonymous	
BOEM-2022-0071-0273	Anonymous	
BOEM-2022-0071-0274	Anonymous	
BOEM-2022-0071-0275	Anonymous	
BOEM-2022-0071-0276	Anonymous	
BOEM-2022-0071-0277	Anonymous	
BOEM-2022-0071-0278	Anonymous	
BOEM-2022-0071-0279	Anonymous	
BOEM-2022-0071-0280	Anonymous	
BOEM-2022-0071-0281	Anonymous	
BOEM-2022-0071-0282-0001	Tom Barracca	Transcript from January 18, 2023 meeting
BOEM-2022-0071-0282-0003	Camden Ackerman	Transcript from January 18, 2023 meeting
BOEM-2022-0071-0282-0009	Gary Yerman	Transcript from January 18, 2023 meeting
BOEM-2022-0071-0282-0010	Ricardo Sanchez	Transcript from January 18, 2023 meeting
BOEM-2022-0071-0282-0011	Constance Gee	Transcript from January 18, 2023 meeting
BOEM-2022-0071-0282-0012	Scot Yerman	Transcript from January 18, 2023 meeting
BOEM-2022-0071-0282-0013	Carl Van Warmerdam	Transcript from January 18, 2023 meeting
BOEM-2022-0071-0283-0009	Michael Daly	Transcript from January 23, 2023 meeting
BOEM-2022-0071-0284-0001	Joseph Kommer	Transcript from January 19, 2023 meeting
BOEM-2022-0071-0284-0003	Carl Van Warmerdam	Transcript from January 19, 2023 meeting