

## Appendix II-U4

### Search and Rescue Risk (SAR) Assessment Workshop Summary Report

March 2024

# Atlantic Shores SAR Risk Assessment Workshop Summary Report

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## List of Abbreviations

| Abbreviation | Definition                                |
|--------------|---|
| ADLS         | Aviation detection lighting system        |
| AGL          | Above Ground Level                        |
| AOR          | Area of responsibility                    |
| BOEM         | Bureau of Ocean Energy Management         |
| EMT          | Emergency Medical Technician              |
| ERP          | Emergency Response plan                   |
| FAA          | Federal Aviation Administration           |
| HAZID        | Hazard Identification                     |
| IFR          | Instrument Flight Rules                   |
| NOAA         | National Oceanic and Atmospheric          |
| NTMs         | Notice to Mariners                        |
| NVIC         | Navigation and Vessel Inspection Circular |
| OSS          | Offshore Substations                      |
| PIW          | Person in water                           |
| SAR          | Search and Rescue                         |
| USCG         | United States Coast Guard                 |
| VFR          | Visual Flight Rules                       |
| VHF          | Very High Frequency                       |
| WTA          | Wind Turbine Area                         |
| WTG          | Wind Turbine Generator                    |

## Introduction

This document summarizes the outcome of the Search and Rescue (SAR) Risk Assessment Workshop (the workshop) conducted in July 2021. The objective of the workshop was to methodically review the potential impacts of the proposed offshore wind projects (the projects) within the Bureau of Ocean Energy Management (BOEM) Lease Area OCS-A 0499 (the Lease Area) on the United States Coast Guard (USCG)'s SAR operations and identify existing safeguards and additional recommended measures to mitigate these impacts. The results from this workshop will inform the development of Atlantic Shores Offshore Wind, LLC (Atlantic Shores)'s Emergency Response Plan (ERP) as well as Atlantic Shores' ongoing efforts to implement practical measures that mitigate any potential impacts of the projects to other ocean users.

## Workshop Overview and Scope

The SAR Risk Assessment Workshop was held on July 20, 2021 from 12:30PM – 5:00PM ET and on July 21 from 1:30PM – 5:00PM ET via Microsoft Teams. The workshop included attendees from Atlantic Shores, the USCG, and BOEM along with other relevant stakeholders. A complete list of attendees can be found in Appendix A: Workshop Attendees.

The scenarios that were developed and assessed during the workshop focused specifically on foreseeable interactions between the proposed projects within the Lease area and helicopter-based SAR operations conducted by the USCG in and around the Lease area. The workshop took into consideration the proposed Wind Turbine Generator (WTG) dimensions and layout as proposed in the Project Design Envelope (PDE), including a 1,047 ft maximum tip height, a 919 ft rotor diameter, and a 1.0 x 0.6 nm turbine spacing. Build out of the full Lease Area was considered, including the area covered by the Construction and Operation Plan (COP) currently under review for the southern portion of the Lease Area as well and the northern portion of the Lease Area which will be covered in a future COP. Figure 1 shows these areas outlined in red and grey respectively.

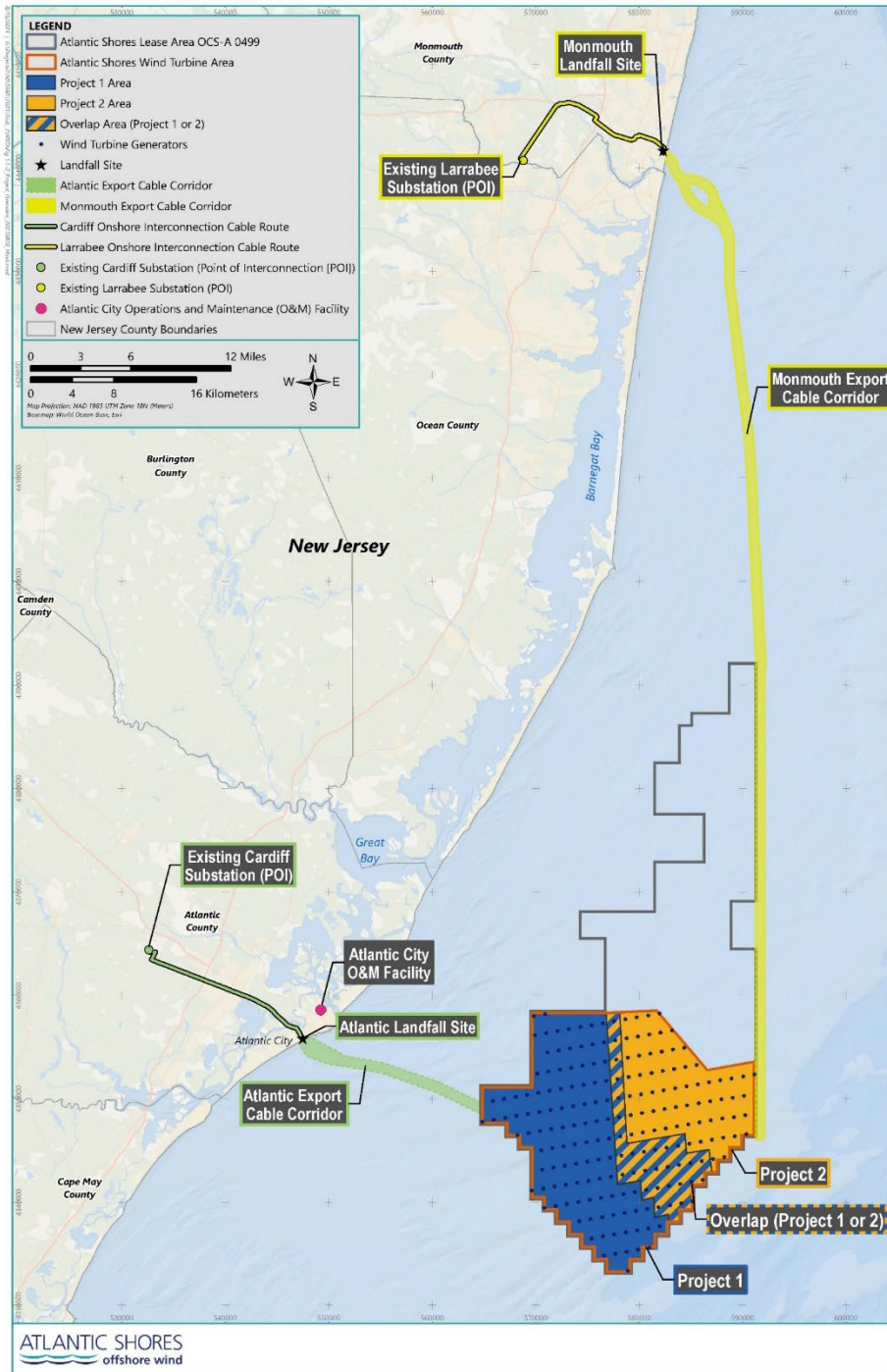


Figure 1: Lease OCS-A 0499

Atlantic Shores has already committed to mitigation measures or safeguards that meaningfully reduce the risk associated with conducting SAR operations in and around the proposed projects. These safeguards were reviewed during the workshop and considered when performing the risk assessments. These safeguards are summarized in Table 1.

**Table 1: Existing Safeguards**

| <b>Existing Safeguards</b>  |
|---|
| 1) A Marine Coordination Center is to be established, led by a Marine Coordinator. Activities of this Center will include monitoring daily vessel movements, implementing of communication protocols with external vessels, and monitoring safety buffers. The Marine Coordinator will be Atlantic Shore's primary point of contact with USCG, port authorities, and state and local law enforcement. |
| 2) Real-time meteorological/oceanographic measurements (waves, wind, currents) will be monitored across the Lease Area.   |
| 3) Atlantic Shores will regularly coordinate with the USCG and NOAA on chart updates as project components (e.g., foundations, WTGs, OSSs) are constructed, and regarding the issuance of Notices to Mariners (NTMs).   |
| 4) A Fisheries Liaison Officer has been hired as part of an overall Fisheries Communication Plan and will communicate and coordinate with the local commercial and recreational fishing community during the construction phase.  |
| 5) Coordination will be carried out with local port authorities on development of vessel traffic management plans for the various staging ports.  |
| 6) All construction and decommissioning vessels will display appropriate navigation lights and day shapes as per regulatory requirements.   |
| 7) Once constructed WTGs and OSSs will be marked and lit in accordance with USCG and BOEM requirements.   |
| 8) Aviation obstruction lighting will be provided on constructed WTGs and OSSs in accordance with FAA and BOEM requirements.  |
| 9) The WTGs and OSSs marked and lit in accordance with USCG and BOEM requirements, including alphanumeric tower designation, distinct lighting on corner towers/significant peripheral structures (SPSs), outer boundary towers and interior towers. Mariner Radio Activated Sound Signals (MRASS) on corner towers/SPSs and perimeter structures will be provided.                                   |
| 10) Implementation of rotor emergency braking system to stop and maintain the position of the WTG blades, nacelles, and other appropriate moving parts.   |
| 11) Possible provision of access ladders as a possible refuge for distressed mariners and a signaling device (to indicate presence on the structure).   |
| 12) Bi-annual testing of the communication and rotor braking systems.   |
| 13) Blades can be oriented to allow for nearly 1 nm access corridor in east-west direction  |

## Methodology

The workshop was facilitated by ABS Group and conducted using a hazard identified (HAZID) approach. Identified scenarios were assessed qualitatively to identify potentially hazardous conditions, assess potential consequences, identify existing mitigations, and document additional recommendations for consideration to further mitigate the consequences of the hazardous scenario. Only hazardous scenarios that were materially impacted by the development of the proposed projects were evaluated. This process is summarized in Figure 2.

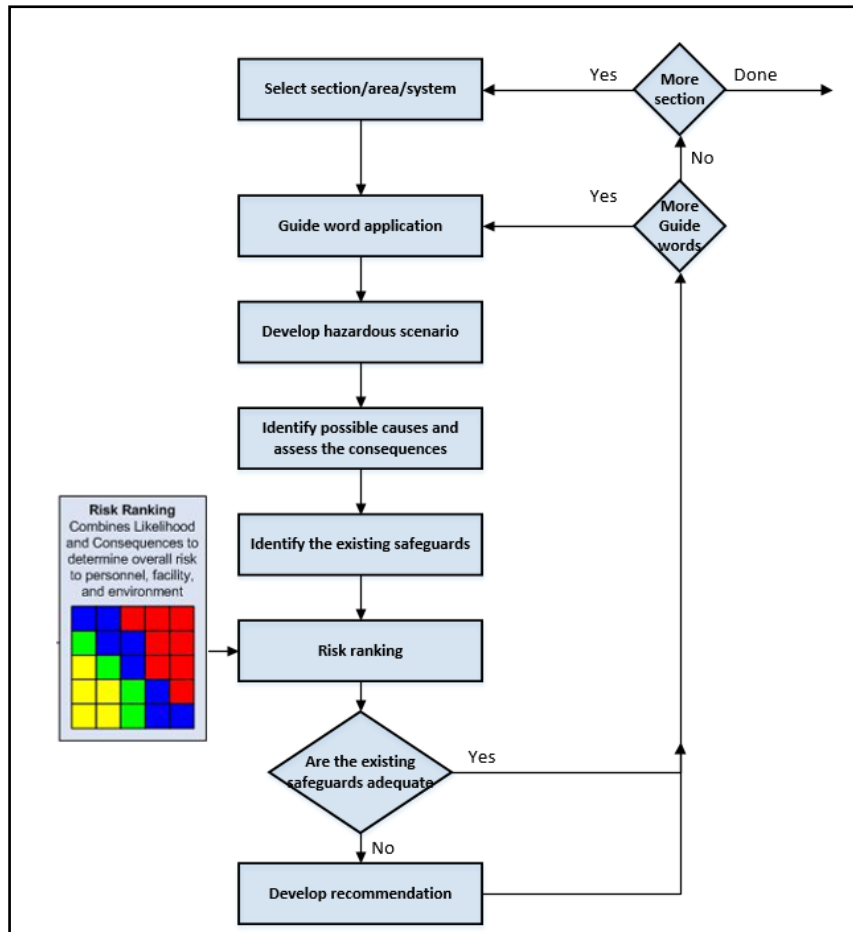


Figure 2: The HAZID Study Process

A Risk Assessment Worksheet was used to capture the discussion during the workshop and contains the following elements:

**Hazard** describes a broad category of factors that could lead to a hazardous scenario.

**Hazardous Scenario** describes a specific occurrence that could lead to consequences.

**Causes** describes a specific event that could occur in a hazardous scenario and result in a consequence.

**Consequences** refer to specific adverse impacts that result from a given hazardous scenario.

**Safeguards** are existing or planned measures that reduces the likelihood or severity of a given consequence.

**Risk Ranking** describes the risk associated with a particular consequence given the existing safeguards.



**Recommendations** are additional measures that could be considered to further reduce the risk associated with a given consequence.

**Mitigated Risk** is the risk ranking of a particular consequence after both the safeguards and recommendations are taken into consideration.

**Remarks** is used to capture any additional discussion that is not captured elsewhere in the worksheet related to a particular hazardous scenario.

A risk assessment was performed for each potential consequence to assign an existing risk level considering only existing safeguards. A summary of these existing safeguards can be found in Table 1. After additional recommended mitigations were identified, a second risk assessment was performed to find the risk level after implementing the identified recommendations. The risk rankings were assessed using the Risk Matrix shown in Figure 3 based on the “severity” and “likelihood” of the worst credible consequence. The worst credible consequence represents the most severe consequence that could reasonably be foreseen to occur as a result of the identified hazardous scenario. The likelihood is based on the probability of the selected worst credible consequence occurring.

Likelihood is ranked from A to E in increasing event frequency, and consequence is ranked from 0 to 5 in increasing severity. Figure 3 provides additional detail on the definition of likelihood and consequence severity levels. Once a likelihood and consequence severity are assigned, the risk matrix can be used to determine a risk ranking – a number/letter combination and corresponding color. Each color indicates a comparable overall level of risk regardless of the specific number/letter designation.

**Light Blue** – Very Low Risk

**Dark Blue** – Low Risk

**Yellow** – Moderate Risk

**Red** – High Risk

Mitigations and recommendations were considered that addressed moderate and high risk consequences. A mitigation that reduces the overall level of risk (for example, moving from a Red to a Yellow) is more impactful than a mitigation that changes the risk designation but does not change the overall risk level (for example, moving from a Yellow to a Yellow). Comparing the severity of the Risk Ranking and the Mitigated Risk provides an indication of the effectiveness of the recommendations for a given scenario at reducing the overall risk.

|                 |   | Consequence Severity  |    |    |    |    |    |    |
|-----------------|---|---|----|----|----|----|----|----|
|                 |   | 0   | 1  | 2  | 3  | 4  | 5  |    |
| Event Frequency | E | Has happened more than once per year at the Location                        | 0E | 1E | 2E | 3E | 4E | 5E |
|                 | D | Has happened at the Location or more than once per year in the Organization | 0D | 1D | 2D | 3D | 4D | 5D |
|                 | C | Has happened in the Organization or more than once per year in the industry | 0C | 1C | 2C | 3C | 4C | 5C |
|                 | B | Heard of in industry  | 0B | 1B | 2B | 3B | 4B | 5B |
|                 | A | Never heard of in industry  | 0A | 1A | 2A | 3C | 4C | 5A |

| Severity | People                         | Asset                              | Environment  | Reputation   |
|----------|--------------------------------|------------------------------------|--|--|
| 0        | No injury or health effect     | No Damage                          | No Effect  | No Impact  |
| 1        | Slight injury or health effect | Slight Damage < \$10K USD          | Slight Effect<br>Contained within the facility   | Slight Impact<br>Local public awareness, but no media coverage   |
| 2        | Minor injury or health effect  | Minor Damage \$10K to \$100K USD   | Minor Effect<br>Minor environmental damage, but no lasting effect  | Minor Impact<br>Local public concern, local media coverage   |
| 3        | Major injury or health effect  | Moderate Damage \$100K to \$1M USD | Moderate Effect<br>Limited environmental damage that will persist or require cleaning up                                       | Moderate Impact<br>Regional public concern, local stakeholders, e.g., community, NGO, industry, and government are aware, extensive local media attention, some regional and national media coverage   |
| 4        | PTD or up to 3 fatalities      | Major Damage \$1M to \$10M USD     | Major Effect<br>Severe environmental damage that will require extensive measures to restore beneficial uses of the environment | Major Impact<br>National public concern, impact on local and national stakeholders, extensive attention in national media, some international media coverage, potential for regulatory action leading to restricted operations or impact on operating licenses |
| 5        | More than 3 fatalities         | Massive Damage > \$10M USD         | Massive Effect<br>Persistent, severe environmental damage that will lead to a loss of commercial, recreational use             | Massive Impact<br>International public concern, high level of concern amongst governments and action by international NGOs, international media attention, significant potential for effect on   |

**Figure 3: Risk Matrix**

## Results and Recommendations

During the 2-day workshop, the team identified and evaluated 13 hazardous scenarios in 4 hazard categories, including Marine Hazards, Wind Farm Infrastructure, Helicopter Operations, and SAR Operations. Throughout the workshop, 16 recommendations were made to support the reduction of overall risk to USCG missions resulting from the full build-out of the offshore wind facility in Atlantic Shores Lease OCS-A 0499. These risk mitigation recommendations and assessed potential for reducing risk are summarized in Table 2. The full outcome of the workshop is captured in Appendix B: Risk Assessment Worksheet.

Atlantic Shores will review these recommendations in coordination with the USCG and key stakeholders and may elect to implement recommendations that are found to meaningfully reduce risk and meet other project criteria.

**Table 2: Recommendations**

| Hazard Category                              | Recommendation  | Existing Risk |   |      |   |     | Mitigated Risk |   |      |   |        |
|--|---|---------------|---|------|---|-----|----------------|---|------|---|--------|
|  |   | S             | E | Sev. | L | RR  | S              | E | Sev. | L | RR     |
| Marine Hazard                                | 1. Evaluate need for VHF direction finding equipment to aid helicopter search and rescue operation.<br>Presence of windfarm may lead to scenario where helicopter pilots might have difficulty in navigating through windfarm. Presence of VHF direction finding equipment will support helicopter pilots during search and rescue operation. | 5             | 2 | 5    | C | Red | 5              | 2 | 5    | B | Yellow |
| Marine Hazard                                | 2. Develop an Emergency Response Plan (ERP) to specify coordination, shutdown, and rescue procedures associated with wind farm. The ERP will need to reviewed and updated regularly based on feedback received from Atlantic Shores and the USCG as windfarm operations evolve.   | 5             | 2 | 5    | C | Red | 5              | 2 | 5    | B | Yellow |
| Marine Hazard<br>Wind Farm<br>Infrastructure | 3. Investigate if high-resolution thermal/infrared detection systems can be deployed across the Lease Area to assist in location of persons in water and/or vessels, across all weather conditions, and day/night operation.  | 5             | 2 | 5    | C | Red | 5              | 2 | 5    | B | Yellow |
| Marine Hazard                                | 4. Review needs for development of training covering the following areas: <ul style="list-style-type: none"> <li>• Search planning efforts</li> <li>• Pilot training</li> <li>• Hoist training</li> <li>• Pilot familiarization training</li> <li>• Lessons learned from international rescue training</li> </ul>                             | 5             | 2 | 5    | C | Red | 5              | 2 | 5    | B | Yellow |
| Marine Hazard<br>Wind Farm<br>Infrastructure | 5. Ensure WTG lights are compatible with night vision technologies to ensure they do not obstruct pilot visibility when night vision technologies are being used.   | 5             |   | 5    | C | Red | 5              |   | 5    | B | Yellow |
| Marine Hazard<br>Wind Farm<br>Infrastructure | 6. Review impact on aircraft radar readings due to WTG presence and if it can lead to any consequence of interest provide adequate safeguards accordingly. (Not ranked)   |               |   |      |   |     |                |   |      |   |        |

| Hazard Category          | Recommendation  | Existing Risk |   |      |   |        | Mitigated Risk |   |      |   |        |
|--------------------------|---|---------------|---|------|---|--------|----------------|---|------|---|--------|
|                          |   | S             | E | Sev. | L | RR     | S              | E | Sev. | L | RR     |
| Wind Farm Infrastructure | 7. Consider implementing passive monitoring in wind farm area to aid in locating of personnel during search operation in wind farm during emergency situations.                               | 4             |   | 4    | D | Red    | 4              |   | 4    | B | Yellow |
| Wind Farm Infrastructure | 8. Consider limiting access (e.g., safety zones) to wind farm during adverse weather conditions.  | 4             |   | 4    | D | Red    | 4              |   | 4    | B | Yellow |
| Wind Farm Infrastructure | 9. Review communication protocol to inform concerned authority on emergency situations within windfarm area.  | 3             |   | 3    | C | Yellow | 3              |   | 3    | B | Blue   |
| Wind Farm Infrastructure | 10. Review developing operating limitation of aircraft within wind farm to ensure aircraft can operate safely within wind farm area.  | 5             |   | 5    | D | Red    | 5              |   | 5    | B | Yellow |
| Wind Farm Infrastructure | 11. Review means to limit the time helicopter spends in wind farm area during SAR operation.  | 5             |   | 5    | D | Red    | 5              |   | 5    | B | Yellow |
| Wind Farm Infrastructure | 12. Review minimum spacing between WTGs to ensure to help mitigated risk of helicopters operations within wind farm area specifically during adverse weather conditions and icing conditions. | 5             |   | 5    | D | Red    | 5              |   | 5    | B | Yellow |
| Wind Farm Infrastructure | 13. Review needs for a single dedicated access corridor (>=1 nm) for helicopter through wind farm in a north-south direction.   | 3             |   | 3    | D | Yellow | 3              |   | 3    | C | Yellow |
| Marine Hazard            | 14. Develop pilot training specific to operation within windfarm to ensure pilots are aware of hazards associated with the flying within and around wind farm area.                           | 5             | 2 | 5    | C | Red    | 5              | 2 | 5    | B | Yellow |
| Wind Farm Infrastructure | 15. Review if substation helipad (if implemented) can act as a safe haven for CG helicopters during emergency scenarios.  | 5             | 2 | 5    | A | Yellow | 5              | 2 | 5    | A | Yellow |
| Wind Farm Infrastructure | 16. Consider means measuring meteorological/oceanographic conditions outside of windfarm area to aid in Coast guard SAR operations outside of wind farm area.                                 | 3             |   | 3    | C | Yellow | 3              |   | 3    | B | Blue   |

## Appendix A: Workshop Attendees

| Name                 | Organization             |
|----------------------|--------------------------|
| Alexis Billet        | Atlantic Shores          |
| Amanda Ingram        | Epsilon Associates, Inc. |
| Baker, Arianna C     | BOEM                     |
| Benjamin Aaronson    | USCG                     |
| Brian Mottel         | USCG                     |
| Colleen Brust        | NJ DEP                   |
| Tim Eason            | USCG                     |
| Jesse Diaz           | USCG                     |
| Robert Webb          | USCG                     |
| Stephen West         | USCG                     |
| Chris Sparkman       | USCG                     |
| Christopher Rein     | EDR                      |
| Joseph Cimino        | NJ DEP                   |
| Cristina Forbes      | USCG                     |
| Dan Butierries       | USCG                     |
| Darshankumar Lakhani | ABSG                     |
| Dwight Dunk          | Epsilon Associates, Inc. |
| Francis Genco        | ABSG                     |
| George Detweiler     | USCG                     |
| Jack Frost           | USCG                     |
| Jennifer Daniels     | Atlantic Shores          |
| Jerry Barnes         | USCG                     |
| Jody Lima            | EDR                      |
| Joris Veldhoven      | Atlantic Shores          |

| Name               | Organization    |
|--------------------|-----------------|
| Joseph Plunkett    | USCG            |
| Kyle Hilberg       | Atlantic Shores |
| Andrew Cooke       | USCG            |
| Ashley Dufresne    | USCG            |
| Chris Pulliam      | USCG            |
| Chris Rosen        | USCG            |
| Mike Feltovic      | USCG            |
| Warren Wright      | USCG            |
| Louis Steinbrecher | ABSG            |
| Lowell Dickerson   | Atlantic Shores |
| Amanda Faulkner    | USCG            |
| Shawn Antonelli    | USCG            |
| Matt Creelman      | USCG            |
| Matthew Brooks     | USCG            |
| Monica Cisternelli | USCG            |
| Paul Phifer        | Atlantic Shores |
| Rain Byars         | Atlantic Shores |
| Ryan Tookes        | Atlantic Shores |
| Brandi Sangunett   | BOEM            |
| Dan Verda          | Atlantic Shores |
| Will Waske         | BOEM            |

**Appendix B: Risk Assessment Worksheet**

| Node: 1. SAR operations within/around the windfarm |  |                                     |   |  |              |   |    |    |     |  |                 |   |    |    |        |  |
|--|--|-------------------------------------|---|--|--------------|---|----|----|-----|--|-----------------|---|----|----|--------|--|
| Hazard   | Hazardous Scenario   | Causes                              | Consequences  | Safeguards   | Risk Ranking |   |    |    |     | Recommendations  | Mitigated Risks |   |    |    |        | Remarks  |
|  |  |                                     |   |  | P            | E | SR | LR | RR  |  | P               | E | SR | LR | RR     |  |
| 1. Marine Hazard                                   | 1. SAR operation in adverse weather condition during daytime | Adverse wind condition or sea state | <p>1. Potential inability to physically control aircraft in adverse wind condition within wind farm area. Potential for aircraft damage if collision with WTG. Personnel injury/fatality.</p> <p>Potential effect on fuel load requirement and search pattern during search planning; delay in performing SAR operation.</p> <p>Inability or difficulty in performing the rescue operation. Potential exists for helicopter collision risk with wind turbine during flyout or emergency situations.</p> <p>Potential ineffective search operational efficiency/reduced probability to detect within wind farm area.</p> <p>Potential reduction in number of searches (helicopter and surface based) conducted because of wind farm presence and due to potential increased risk of collision with WTGs.</p> | <p>1. Real-time meteorological/oceanographic measurements (waves, wind, currents) will be monitored across the Lease Area and this information can be shared with USCG/NOAA.</p>   | 5            | 2 | 5  | C  | Red | <p>1. Evaluate need for VHF direction finding equipment to aid helicopter search and rescue operation.</p> <p>Presence of windfarm may lead to scenario where helicopter pilots might have difficulty in navigating through windfarm. Presence of VHF direction finding equipment will support helicopter pilots during search and rescue operation.</p> | 5               | 2 | 5  | B  | Yellow | <p>1. Surface SAR operation is not part of this study scope and will be reviewed separately, as applicable</p> |
|  |  |                                     |   | <p>2. Ability to shutdown wind turbines on request (shutdown time)</p> <p>Implementation of rotor emergency braking system to stop and maintain the position of the WTG blades, nacelles, and other appropriate moving parts.</p>  |              |   |    |    |     | <p>2. Develop an Emergency Response Plan (ERP) to specify coordination, shutdown, and rescue procedures associated with wind farm. The ERP will need to reviewed and updated regularly based on feedback received from Atlantic Shores and the USCG as windfarm operations evolve.</p>   |                 |   |    |    |        |  |
|  |  |                                     |   | <p>Bi-annual testing of the communication and rotor braking systems</p>  |              |   |    |    |     | <p>3. Investigate if high-resolution thermal/infrared detection systems can be deployed across the Lease Area to assist in location of persons in water and/or vessels, across all weather conditions, and day/night operation.</p>  |                 |   |    |    |        |  |
|  |  |                                     |   | <p>3. A Marine Coordination Center is to be established, led by a Marine Coordinator. Activities of this Center will include monitoring daily vessel movements, implementing of communication protocols with external vessels, and monitoring safety buffers. The Marine Coordinator will be Atlantic Shore’s primary point of contact with USCG, port authorities, state and local law enforcement, marine patrol, port operators, and commercial operators (e.g., ferry, tourist, and fishing boat operators).</p> |              |   |    |    |     | <p>4. Review needs for development of training covering the following areas:</p> <ul style="list-style-type: none"> <li>• Search planning efforts</li> <li>• pilot training</li> <li>• Hoist training</li> <li>• Pilot familiarization training</li> <li>• Lessons learned from international rescue training</li> </ul>                                 |                 |   |    |    |        |  |
|  |  |                                     |   | <p>4. Atlantic Shores will regularly coordinate with the USCG and NOAA on chart updates as Project components (e.g., foundations, WTGs, OSSs) are constructed and regarding the issuance of Notices to Mariners (NTMs).</p>  |              |   |    |    |     | <p>14. Develop pilot training specific to operation within windfarm to ensure pilots are aware of hazards associated with the flying within and around wind farm area.</p>   |                 |   |    |    |        |  |
|  |  |                                     | <p>5.The WTGs and OSSs marked and lit in accordance with USCG and BOEM requirements, including alphanumeric tower designation, distinct lighting on corner towers/significant peripheral structures (SPSs), outer boundary towers and interior towers. Mariner Radio Activated Sound Signals (MRASS) on corner</p>  |  |              |   |    |    |     |  |                 |   |    |    |        |  |

**Node: 1. SAR operations within/around the windfarm**

| Hazard | Hazardous Scenario | Causes                              | Consequences  | Safeguards  | Risk Ranking |   |    |    |     | Recommendations  | Mitigated Risks |   |    |    |        | Remarks |  |
|--------|--------------------|-------------------------------------|---|---|--------------|---|----|----|-----|--|-----------------|---|----|----|--------|---------|--|
|        |                    |                                     |   |   | P            | E | SR | LR | RR  |  | P               | E | SR | LR | RR     |         |  |
|        |                    |                                     |   | towers/SPSs and perimeter structures will be provided.<br><br>WTG foundation will also be marked with temporary lighting during construction phase<br><br>6. Aviation obstruction lighting will be provided on constructed WTGs and OSSs in accordance with FAA and BOEM requirements.  |              |   |    |    |     |  |                 |   |    |    |        |         |  |
|        |                    | Adverse wind condition or sea state | 1. Inability to perform SAR; potential personnel injury /fatality event | 1. Aviation obstruction lighting will be provided on constructed WTGs and OSSs in accordance with FAA and BOEM requirements.<br><br>2. The WTGs and OSSs marked and lit in accordance with USCG and BOEM requirements, including alphanumeric tower designation, distinct lighting on corner towers/significant peripheral structures (SPSs), outer boundary towers and interior towers. Mariner Radio Activated Sound Signals (MRASS) on corner towers/SPSs and perimeter structures will be provided.<br><br>WTG foundation will also be marked with temporary lighting during construction phase<br><br>3. Atlantic Shores will regularly coordinate with the USCG and NOAA on chart updates as Project components (e.g., foundations, WTGs, OSSs) are constructed and regarding the issuance of Notices to Mariners (NTMs).<br><br>4. A Marine Coordination Center is to be established, led by a Marine Coordinator. Activities of this Center will include monitoring daily vessel movements, implementing of communication protocols with external vessels, and monitoring safety buffers. The Marine Coordinator will be Atlantic Shore’s primary point of contact with USCG, port authorities, state and local law enforcement, marine patrol, port operators, and commercial operators (e.g., ferry, tourist, and fishing boat operators).<br><br>5. Ability to shutdown wind turbines on request (shutdown time) | 4            |   | 4  | D  | Red | 1. Evaluate need for VHF direction finding equipment to aid helicopter search and rescue operation.<br><br>Presence of windfarm may lead to scenario where helicopter pilots might have difficulty in navigating through windfarm. Presence of VHF direction finding equipment will support helicopter pilots during search and rescue operation.<br><br>2. Develop an Emergency Response Plan (ERP) to specify coordination, shutdown, and rescue procedures associated with wind farm. The ERP will need to reviewed and updated regularly based on feedback received from Atlantic Shores and the USCG as windfarm operations evolve.<br><br>3. Investigate if high-resolution thermal/infrared detection systems can be deployed across the Lease Area to assist in location of persons in water and/or vessels, across all weather conditions, and day/night operation.<br><br>4. Review needs for development of training covering the following areas:<br><ul style="list-style-type: none"> <li>• Search planning efforts</li> <li>• pilot training</li> <li>• Hoist training</li> <li>• Pilot familiarization training</li> <li>• Lessons learned from international rescue training</li> </ul><br>14. Develop pilot training specific to operation within windfarm to ensure | 4               |   | 4  | C  | Yellow |         |  |



**Node: 1. SAR operations within/around the windfarm**

| Hazard | Hazardous Scenario   | Causes                              | Consequences   | Safeguards  | Risk Ranking |   |    |    |     | Recommendations  | Mitigated Risks |   |    |    |        | Remarks   |
|--------|--|-------------------------------------|--|---|--------------|---|----|----|-----|--|-----------------|---|----|----|--------|---|
|        |  |                                     |  |   | P            | E | SR | LR | RR  |  | P               | E | SR | LR | RR     |   |
|        |  |                                     |  | Implementation of rotor emergency braking system to stop and maintain the position of the WTG blades, nacelles, and other appropriate moving parts.<br><br>Bi-annual testing of the communication and rotor braking systems.<br><br>6. Real-time meteorological/oceanographic measurements (waves, wind, currents) will be monitored across the Lease Area and this information can be shared with USCG/NOAA.   |              |   |    |    |     | pilots are aware of hazards associated with the flying within and around wind farm area.   |                 |   |    |    |        |   |
|        | 2. SAR operation in adverse weather condition during nighttime | Adverse wind condition or sea state | 1. Potential inability to physically control aircraft in adverse wind condition within wind farm area. Potential for aircraft damage if collision with WTG. Personnel injury/fatality.<br><br>Potential effect on fuel load requirement and search pattern during search planning; delay in performing SAR operation.<br><br>Inability or difficulty in performing the rescue operation. Potential exists for helicopter collision risk with wind turbine during flyout or emergency situations.<br><br>Potential ineffective search operational efficiency/reduced probability to detect within wind farm area.<br><br>Potential reduction in number of searches (helicopter and surface based) conducted because of wind farm presence and due to potential increased risk of collision with WTGs.<br><br>Potential impact on night vision equipment from WTGs lights. | 1. Pilot training specific to operation within windfarm<br><br>2. Real-time meteorological/oceanographic measurements (waves, wind, currents) will be monitored across the Lease Area and this information can be shared with USCG/NOAA.<br><br>3. Ability to shutdown wind turbines on request (shutdown time)<br><br>Implementation of rotor emergency braking system to stop and maintain the position of the WTG blades, nacelles, and other appropriate moving parts.<br><br>4. A Marine Coordination Center is to be established, led by a Marine Coordinator. Activities of this Center will include monitoring daily vessel movements, implementing of communication protocols with external vessels, and monitoring safety buffers. The Marine Coordinator will be Atlantic Shore's primary point of contact with USCG, port authorities, state and local law enforcement, marine patrol, port operators, and commercial operators (e.g., ferry, tourist, and fishing boat operators).<br><br>5. Atlantic Shores will regularly coordinate with the USCG and NOAA on chart updates as Project components (e.g., foundations, WTGs, OSSs) are | 5            |   | 5  | C  | Red | 1. Evaluate need for VHF direction finding equipment to aid helicopter search and rescue operation.<br><br>Presence of windfarm may lead to scenario where helicopter pilots might have difficulty in navigating through windfarm. Presence of VHF direction finding equipment will support helicopter pilots during search and rescue operation.<br><br>2. Develop an Emergency Response Plan (ERP) to specify coordination, shutdown, and rescue procedures associated with wind farm. The ERP will need to be reviewed and updated regularly based on feedback received from Atlantic Shores and the USCG as windfarm operations evolve.<br><br>3. Investigate if high-resolution thermal/infrared detection systems can be deployed across the Lease Area to assist in location of persons in water and/or vessels, across all weather conditions, and day/night operation.<br><br>4. Review needs for development of training covering the following areas: <ul style="list-style-type: none"> <li>• Search planning efforts</li> <li>• pilot training</li> <li>• Hoist training</li> <li>• Pilot familiarization training</li> <li>• Lessons learned from international rescue training</li> </ul> 5. Ensure WTG lights are compatible with night vision technologies to ensure they | 5               |   | 5  | B  | Yellow | 1. Surface SAR operation is not part of this study scope and will be reviewed separately, as applicable |

**Node: 1. SAR operations within/around the windfarm**

| Hazard | Hazardous Scenario | Causes                              | Consequences   | Safeguards   | Risk Ranking |   |    |    |     | Recommendations  | Mitigated Risks |   |    |    |        | Remarks |
|--------|--------------------|-------------------------------------|--|--|--------------|---|----|----|-----|--|-----------------|---|----|----|--------|---------|
|        |                    |                                     |  |  | P            | E | SR | LR | RR  |  | P               | E | SR | LR | RR     |         |
|        |                    |                                     |  | <p>constructed and regarding the issuance of Notices to Mariners (NTMs).</p> <p>6. The WTGs and OSSs marked and lit in accordance with USCG and BOEM requirements, including alphanumeric tower designation, distinct lighting on corner towers/significant peripheral structures (SPSs), outer boundary towers and interior towers. Mariner Radio Activated Sound Signals (MRASS) on corner towers/SPSs and perimeter structures will be provided.</p> <p>WTG foundation will also be marked with temporary lighting during construction phase</p> <p>7. Aviation obstruction lighting will be provided on constructed WTGs and OSSs in accordance with FAA and BOEM requirements.</p>  |              |   |    |    |     | do not obstruct pilot visibility when night vision technologies are being used.  |                 |   |    |    |        |         |
|        |                    | Adverse wind condition or sea state | 1. Inability to perform SAR; Potential personnel injury /fatality event during night | <p>1. Aviation obstruction lighting will be provided on constructed WTGs and OSSs in accordance with FAA and BOEM requirements.</p> <p>2. The WTGs and OSSs marked and lit in accordance with USCG and BOEM requirements, including alphanumeric tower designation, distinct lighting on corner towers/significant peripheral structures (SPSs), outer boundary towers and interior towers. Mariner Radio Activated Sound Signals (MRASS) on corner towers/SPSs and perimeter structures will be provided.</p> <p>WTG foundation will also be marked with temporary lighting during construction phase.</p> <p>3. Atlantic Shores will regularly coordinate with the USCG and NOAA on chart updates as Project components (e.g., foundations, WTGs, OSSs) are constructed and regarding the issuance of Notices to Mariners (NTMs).</p> <p>4. A Marine Coordination Center is to be established, led by a Marine Coordinator. Activities of this Center will include monitoring daily vessel movements, implementing of communication protocols with external vessels, and monitoring safety buffers. The Marine Coordinator will be Atlantic Shore’s primary point of contact with USCG, port authorities, state and local law enforcement, marine patrol, port operators, and commercial operators (e.g., ferry, tourist, and fishing boat operators).</p> | 4            |   | 4  | D  | Red | <p>14. Develop pilot training specific to operation within windfarm to ensure pilots are aware of hazards associated with the flying within and around wind farm area.</p> <p>4. Review needs for development of training covering the following areas:</p> <ul style="list-style-type: none"> <li>• Search planning efforts</li> <li>• pilot training</li> <li>• Hoist training</li> <li>• Pilot familiarization training</li> <li>• Lessons learned from international rescue training</li> </ul> <p>3. Investigate if high-resolution thermal/infrared detection systems can be deployed across the Lease Area to assist in location of persons in water and/or vessels, across all weather conditions, and day/night operation.</p> <p>2. Develop an Emergency Response Plan (ERP) to specify coordination, shutdown, and rescue procedures associated with wind farm. The ERP will need to reviewed and updated regularly based on feedback received from Atlantic Shores and the USCG as windfarm operations evolve.</p> | 4               |   | 4  | C  | Yellow |         |

**Node: 1. SAR operations within/around the windfarm**

| Hazard | Hazardous Scenario                          | Causes                 | Consequences  | Safeguards   | Risk Ranking |   |    |    |        | Recommendations   | Mitigated Risks   |   |    |    |        | Remarks   |  |
|--------|---|------------------------|---|--|--------------|---|----|----|--------|---|---|---|----|----|--------|---|--|
|        |   |                        |   |  | P            | E | SR | LR | RR     |   | P   | E | SR | LR | RR     |   |  |
|        |   |                        |   | 5. Ability to shutdown wind turbines on request (shutdown time)<br><br>Implementation of rotor emergency braking system to stop and maintain the position of the WTG blades, nacelles, and other appropriate moving parts.<br><br>Bi-annual testing of the communication and rotor braking systems.<br>6. Real-time meteorological/oceanographic measurements (waves, wind, currents) will be monitored across the Lease Area and this information can be shared with USCG.<br>7. Pilot training specific to operation within windfarm   |              |   |    |    |        |   | 1. Evaluate need for VHF direction finding equipment to aid helicopter search and rescue operation.<br><br>Presence of windfarm may lead to scenario where helicopter pilots might have difficulty in navigating through windfarm. Presence of VHF direction finding equipment will support helicopter pilots during search and rescue operation. |   |    |    |        |   |  |
|        | 3. Navigational equipment failure           | Equipment malfunction  | 1. Potential difficulty in navigating through wind farm; potential for air craft damage if collision with WTG; personnel injury/fatality.   | 1. The WTGs and OSSs marked and lit in accordance with USCG and BOEM requirements, including alphanumeric tower designation, distinct lighting on corner towers/significant peripheral structures (SPSs), outer boundary towers and interior towers. Mariner Radio Activated Sound Signals (MRASS) on corner towers/SPSs and perimeter structures will be provided.<br><br>WTG foundation will also be marked with temporary lighting during construction phase<br>2. Each WTG will have unique physical identification marked to aid as visual navigational and can support search planning | 5            | 2 | 5  | B  | Yellow | 2. Develop an Emergency Response Plan (ERP) to specify coordination, shutdown, and rescue procedures associated with wind farm. The ERP will need to reviewed and updated regularly based on feedback received from Atlantic Shores and the USCG as windfarm operations evolve. | 5   | 2 | 5  | B  | Yellow | 1. WTG will not be preferred to be used for navigational purpose other than visual aid during clear weather condition |  |
|        |   | Equipment malfunction  | 1. Inability to continue search operation and potential return to base  | 1. Each WTG will have unique physical identification marked to aid as visual navigational and can support search planning<br>2. The WTGs and OSSs marked and lit in accordance with USCG and BOEM requirements, including alphanumeric tower designation, distinct lighting on corner towers/significant peripheral structures (SPSs), outer boundary towers and interior towers. Mariner Radio Activated Sound Signals (MRASS) on corner towers/SPSs and perimeter structures will be provided.<br><br>WTG foundation will also be marked with temporary lighting during construction phase | 3            |   | 3  | D  | Yellow | 2. Develop an Emergency Response Plan (ERP) to specify coordination, shutdown, and rescue procedures associated with wind farm. The ERP will need to reviewed and updated regularly based on feedback received from Atlantic Shores and the USCG as windfarm operations evolve. | 3   |   | 3  | D  | Yellow | 1. Most likely backup helicopter will be sent to continue SAR operation during equipment malfunction                  |  |
|        | 4. Sensor interference (human or equipment) | WTG Radar interference | 1. See recommendation; during the workshop consensus was not reached on effects of WTGs and radar interference and team recommended additional review as indicated in recommendation. |  |              |   |    |    |        | 6. Review impact on aircraft radar readings due to WTG presence and if it can lead to any consequence of interest provide adequate safeguards accordingly.  |   |   |    |    |        |   |  |

**Node: 1. SAR operations within/around the windfarm**

| Hazard  | Hazardous Scenario  | Causes  | Consequences  | Safeguards  | Risk Ranking |   |    |        |        | Recommendations | Mitigated Risks |   |    |        |        | Remarks |
|---|---|---|---|---|--------------|---|----|--------|--------|-----------------|-----------------|---|----|--------|--------|---------|
|   |   |   |   |   | P            | E | SR | LR     | RR     |                 | P               | E | SR | LR     | RR     |         |
|   | 5. Communications failure   | Equipment malfunction   | 1. Potential difficulty in navigating through wind farm; potential for aircraft damage if collision with WTG, personnel injury/fatality<br><br>Most likely scenario will be aircraft not to fly through wind farm   | 1. The WTGs and OSSs marked and lit in accordance with USCG and BOEM requirements, including alphanumeric tower designation, distinct lighting on corner towers/significant peripheral structures (SPSs), outer boundary towers and interior towers. Mariner Radio Activated Sound Signals (MRASS) on corner towers/SPSs and perimeter structures will be provided.<br><br>WTG foundation will also be marked with temporary lighting during construction phase | 5            | 2 | 5  | B      | Yellow |                 | 5               | 2 | 5  | B      | Yellow |         |
|   |   |   |   | 2. Ability to shutdown wind turbines on request (shutdown time)<br>Implementation of rotor emergency braking system to stop and maintain the position of the WTG blades, nacelles, and other appropriate moving parts.<br><br>Bi-annual testing of the communication and rotor braking systems.   |              |   |    |        |        |                 |                 |   |    |        |        |         |
|   | Equipment malfunction   | 1. Inability to continue search operation and potential return base | 1. Ability to shutdown wind turbines on request (shutdown time)<br><br>Implementation of rotor emergency braking system to stop and maintain the position of the WTG blades, nacelles, and other appropriate moving parts.<br><br>Bi-annual testing of the communication and rotor braking systems.                                     | 3   |              | 3 | D  | Yellow |        | 5               | 2               | 5 | B  | Yellow |        |         |
|   |   |   | 2. Constructed WTGs and OSSs will be marked and lit in accordance with USCG and BOEM requirements.<br><br>WTG foundation will also be marked with temporary lighting during construction phase<br>3. All construction/decommissioning vessels will display appropriate navigation lights and day shapes as per regulatory requirements. |   |              |   |    |        |        |                 |                 |   |    |        |        |         |
| 6. Passing vessels /proximity to shipping lanes | Refer to ship navigational safety risk assessment.                |   | 1. Coordination will be carried out with local port authorities on development of vessel traffic management plans for the various staging ports.  |   |              |   |    |        |        |                 |                 |   |    |        |        |         |
| 7. Simultaneous operations (SIMOPS)             | Surface SIMOPS operation is not expected to affect SAR operations |   |   |   |              |   |    |        |        |                 |                 |   |    |        |        |         |
|   |   |   | 1. Aircraft frequency monitoring  | 5   | 2            | 5 | B  | Yellow |        | 5               | 2               | 5 | B  | Yellow |        |         |

**Node: 1. SAR operations within/around the windfarm**

| Hazard                      | Hazardous Scenario | Causes                     | Consequences  | Safeguards  | Risk Ranking |   |    |    |        | Recommendations  | Mitigated Risks  |   |    |    |        | Remarks |  |
|-----------------------------|--------------------|----------------------------|---|---|--------------|---|----|----|--------|--|--|---|----|----|--------|---------|--|
|                             |                    |                            |   |   | P            | E | SR | LR | RR     |  | P  | E | SR | LR | RR     |         |  |
|                             |                    | Aerial windfarm operations | 1. Potential for collision risk with windfarm aircrafts   | 2. A Marine Coordination Center is to be established, led by a Marine Coordinator. Activities of this Center will include monitoring daily vessel movements, implementing of communication protocols with external vessels, and monitoring safety buffers. The Marine Coordinator will be Atlantic Shore's primary point of contact with USCG, port authorities, state and local law enforcement, marine patrol, port operators, and commercial operators (e.g., ferry, tourist, and fishing boat operators). |              |   |    |    |        |  |  |   |    |    |        |         |  |
| 2. Wind farm Infrastructure | 1. Obstruction     | Wind farm presence         | 1. Potential impact on search patterns in area around wind farm; potential delay in SAR operations - Refer to above scenario  |   |              |   |    |    |        | 3. Investigate if high-resolution thermal/infrared detection systems can be deployed across the Lease Area to assist in location of persons in water and/or vessels, across all weather conditions, and day/night operation. |  |   |    |    |        |         |  |
|                             |                    | Wind farm presence         | 1. Potential limitation on aircraft response during aircraft emergency, delayed arrival to safe landing area/ potential aircraft damage; personnel fatality/injury  |   | 5            | 2 | 5  | A  | Yellow | 15. Review if substation helipad can act as a safe haven for CG helicopters during emergency scenarios   | 5  | 2 | 5  | A  | Yellow |         |  |
|                             |                    | Wind farm presence         | 1. Potential increase in personnel presence (e.g., eco-tourism, recreational fishing etc.) in wind farm area leading to potential increase in high likelihood of incidents.<br><br>Scenario was not risk ranked.  | 1. A Fisheries Liaison Officer has been hired as part of an overall Fisheries Communication Plan and will communicate and coordinate with the local commercial and recreational fishing community during the construction phase.  |              |   |    |    |        |  | 3. Investigate if high-resolution thermal/infrared detection systems can be deployed across the Lease Area to assist in location of persons in water and/or vessels, across all weather conditions, and day/night operation. |   |    |    |        |         |  |
|                             |                    | Wind farm presence         | 1. SAR-Operation software provides feedback for search planning based on data (wind conditions, current patterns) collected from subject SAR area.<br><br>Presence of wind farm might impact optimized search pattern and probability of success calculations leading to impact on SAR decision making process.<br><br>Potential delay in SAR operations. | 1. Atlantic Shores will regularly coordinate with the USCG and NOAA on chart updates as Project components (e.g., foundations, WTGs, OSSs) are constructed and regarding the issuance of Notices to Mariners (NTMs).  |              |   |    |    |        |  |  |   |    |    |        |         |  |
|                             |                    | Wind farm presence         | 1. Reduced effectiveness of searching of small objects in wind farm area - Potential delay in SAR operations.   | 1. Provision of access ladders as a possible refuge for distressed mariners and a signaling device (to indicate presence on the structure).   | 4            |   | 4  | D  | Red    | 3. Investigate if high-resolution thermal/infrared detection systems can be deployed across the Lease Area to assist in location of persons in water and/or vessels, across all weather conditions, and day/night operation. | 4  |   | 4  | B  | Yellow |         |  |

**Node: 1. SAR operations within/around the windfarm**

| Hazard | Hazardous Scenario | Causes                         | Consequences   | Safeguards  | Risk Ranking |   |    |    |        | Recommendations  | Mitigated Risks |   |    |    |        | Remarks   |
|--------|--------------------|--------------------------------|--|---|--------------|---|----|----|--------|--|-----------------|---|----|----|--------|---|
|        |                    |                                |  |   | P            | E | SR | LR | RR     |  | P               | E | SR | LR | RR     |   |
|        |                    |                                |  |   |              |   |    |    |        | 7. Consider implementing passive monitoring in wind farm area to aid in locating of personnel during search operation in wind farm during emergency situations<br>8. Consider limiting access (e.g., safety zones) to wind farm during adverse weather conditions.   |                 |   |    |    |        |   |
|        |                    | Wind farm presence             | 1. Potential impact on HF radar readings leading to potential inaccuracy in environmental data which will impact drift estimates; potential inability located objects during SAR operation.<br><br>Potential windfarm shadow impact on surface wind and wave/current parameters around base of individual wind turbine base; ineffective SAR search planning; potential to impact survival time calculations.<br><br>Impact of radar shadow on east of windfarm area | 1. Real-time meteorological/oceanographic measurements (waves, wind, currents) will be monitored across the Lease Area and this information can be shared with USCG/NOAA.<br><br>2. Radar interference study is performed to review impact of wind farm on HF radar readings<br><br>3. Provision of access ladders as a possible refuge for distressed mariners and a signaling device (to indicate presence on the structure). | 3            |   | 3  | C  | Yellow | 3. Investigate if high-resolution thermal/infrared detection systems can be deployed across the Lease Area to assist in location of persons in water and/or vessels, across all weather conditions, and day/night operation.<br><br>9. Review communication protocol to inform concerned authority on emergency situations within windfarm area<br><br>16. Consider means measuring meteorological/oceanographic conditions outside of windfarm area to aid in Coast guard SAR operations outside of wind farm area.   | 3               |   | 3  | B  | Blue   |   |
|        |                    | Spacing                        | 1. Potential impact/restriction on helicopter flight path in wind farm area; impact on search efficiency specifically regarding small objects (e.g., PIW)  | 1. Pilot training specific to operation within windfarm<br><br>2. Ability to orient and brake wind turbine to facilitate search operation   | 5            |   | 5  | D  | Red    | 10. Review developing operating limitation of aircraft within wind farm to ensure aircraft can operate safely within wind farm area.<br><br>11. Review means to limit the time helicopter spends in wind farm area during SAR operation<br><br>12. Review minimum spacing between WTGs to ensure to help mitigated risk of helicopters operations within wind farm area specifically during adverse weather conditions and icing conditions.<br><br>3. Investigate if high-resolution thermal/infrared detection systems can be deployed across the Lease Area to assist in location of persons in water and/or vessels, across all weather conditions, and day/night operation. | 5               |   | 5  | B  | Yellow | 1. Fixed wing aircraft operations is not part of this scope<br><br>2. Micro siting could further degrade CG operations within wind farm |
|        |                    | Adjacent Windfarm - Ocean Wind | 1. Limitation on helicopter flight path due to lack of transit corridor between two wind farms.<br><br>Note: Interface issues between adjacent wind farm is under review   |   |              |   |    |    |        |  |                 |   |    |    |        |   |

**Node: 1. SAR operations within/around the windfarm**

| Hazard                   | Hazardous Scenario                   | Causes  | Consequences  | Safeguards  | Risk Ranking |   |    |    |        | Recommendations   | Mitigated Risks |   |    |    |        | Remarks |
|--------------------------|--------------------------------------|---|---|---|--------------|---|----|----|--------|---|-----------------|---|----|----|--------|---------|
|                          |                                      |   |   |   | P            | E | SR | LR | RR     |   | P               | E | SR | LR | RR     |         |
|                          |                                      |   | and is not part of this study scope. Scenario was not risk ranked   |   |              |   |    |    |        |   |                 |   |    |    |        |         |
|                          |                                      | Icing conditions                                    | 1. Inability to fly over the wind farm due to icing conditions, will require fly around wind farm, potential longer flight path; delay in SAR operations. | 1. Blades can be oriented to allow for nearly 1 nm access corridor in east west direction   | 3            |   | 3  | D  | Yellow | 12. Review minimum spacing between WTGs to ensure to help mitigated risk of helicopters operations within wind farm area specifically during adverse weather conditions and icing conditions.<br>13. Review needs for a single dedicated access corridor (>=1 nm) for helicopter through wind farm in a north-south direction | 3               |   | 3  | C  | Yellow |         |
|                          | 2. Turbulence                        | Wind turbine turbulence                             | 1. Potential impact on helicopter operation.<br><br>Scenario was not risk ranked.   | 1. Pilot training specific to operation within windfarm<br>2. Ability to orient and brake wind turbine to facilitate search operation<br>3. Ability to orient and brake wind turbine to minimize turbulence during SAR operation                |              |   |    |    |        |   |                 |   |    |    |        |         |
|                          | 3. Emergency response infrastructure | Incident/emergency on turbine while crew is present | 1. Emergency operation will be performed by Atlantic shore for WTG emergency events/incidents.<br><br>Scenario was not risk ranked.                       | 1. Windfarm will be supported by standby support vessel<br>2. Pilot training specific to rescue operation on wind turbines<br>3. Wind farm emergency response plan will include different mode of operation and applicable contingency measures |              |   |    |    |        |   |                 |   |    |    |        |         |
| 3. Helicopter Operations | 1. Helicopter type                   | No causes of concern identified                     |   |   |              |   |    |    |        |   |                 |   |    |    |        |         |
| 4. SAR operation         | 1. Static shock                      | Static electricity                                  | 1. Potential for static electric hazards from WTG to helicopters;<br><br>Existing risk and scenario was not risk ranked.                                  | 1. WTGs will be grounded<br>2. Helicopter SAR operational manual includes grounding requirements  |              |   |    |    |        |   |                 |   |    |    |        |         |
|                          | 2. Hoist operation                   | No causes of concern identified                     |   |   |              |   |    |    |        |   |                 |   |    |    |        |         |