



Scoping Summary Report for the Revolution Wind Farm Environmental Impact Statement

MARCH 2022

PREPARED FOR

Bureau of Ocean Energy Management

PREPARED BY

SWCA Environmental Consultants

CONTENTS

1	Introduction	3
2	Objective.....	3
3	Methodology.....	4
3.1	Terminology	4
3.2	Comment Submittal	4
3.3	Comment Processing	5
	Compilation of Submissions.....	5
	Identification of Comments	5
4	Scoping Submission and Comment Summary.....	5
4.1	Submissions	5
4.2	Comments.....	7
4.3	Definition of Resource Areas and Common National Environmental Policy Act Topics	
	Raised	8
	Air and Climate.....	8
	Alternatives.....	9
	Appendices	11
	Aquatic Habitat/Species (general)	11
	Bats 11	
	Benthic Habitat and Invertebrates.....	12
	Birds 12	
	Commercial Fishing.....	12
	Cultural Resources.....	13
	Cumulative.....	13
	Effects Analysis (general).....	14
	Environmental Justice.....	15
	Essential Fish Habitat and Finfish	15
	General Neutrality	16
	General Opposition.....	16
	General Support.....	16
	Marine Mammals.....	17
	Mitigation	18
	National Environmental Policy Act Process.....	18
	Navigation.....	19
	Proposed Action.....	19
	Public Involvement.....	20
	Purpose and Need	21
	Recreation	21
	Sea Turtles	21
	Socioeconomics	22
	Technical Editing and Document Structure	22
	Visual Resources	23
	Water Resources	23
	Waters of the United States	23
	Wildlife (general).....	24

Appendices

Appendix A. List of Submission IDs, Names, and Affiliations

Tables

Table 1. Public Scoping Meetings	4
Table 2. Distribution of Submissions and Comments Received by Type.....	5
Table 3. Non-Governmental Organization Submissions	6
Table 4. Distribution of Comments by Resource Addressed.....	7

1 INTRODUCTION

The following is a summary of public comments received by the Bureau of Ocean Energy Management (BOEM) regarding the Revolution Wind Farm and Revolution Wind Export Cable Project, hereafter referred to as the Project or Proposed Action.

On March 13, 2020, Revolution Wind, LLC (Revolution Wind) (formerly DWW Rev I, LLC) submitted a construction and operations plan (COP) to BOEM seeking approval to construct and operate the Project, a proposed wind energy facility located approximately 15 nautical miles (nm) southeast of the Rhode Island coast, and approximately 13 nm east of Block Island, Rhode Island, in the Atlantic Ocean.

On April 30, 2021, BOEM issued a notice of intent (NOI) to prepare an environmental impact statement (EIS) consistent with the regulations implementing the National Environmental Policy Act (NEPA) (42 United States Code 4321 et seq.) to assess the potential impacts of the Proposed Action and alternatives (86 *Federal Register* 22972). The NOI initiated a public scoping process which solicited input from federal agencies, tribes, state and local governments, and the general public regarding potential significant resources and issues, impact producing factors, reasonable alternatives, and potential mitigation measures to be analyzed in the EIS as well as additional sources of information for consideration. The public scoping period occurred from April 30 through June 1, 2021.

On June 4, 2021, BOEM issued a correction to the NOI with a reopening of the public scoping period (86 *Federal Register* 30068). The correction addressed and clarified two statements in the NOI regarding the energy capacity of the proposed wind farm and its distance from shore¹. In addition, the NOI correction reopened the comment period, allowing for comments to be received by June 11, 2021.

2 OBJECTIVE

The goals of this scoping report are to

- ensure that every comment is considered,
- identify the concerns raised by all respondents,
- represent the breadth and depth of the public's viewpoints and concerns as fairly as possible, and
- present public concerns to facilitate BOEM's consideration of comments.

Although this summary attempts to capture the full range of public issues and concerns, they should be considered with caution. Because respondents are self-selected, their comments may not necessarily represent the sentiments of the public as a whole. This summary attempts to provide a fair representation of the wide range of views submitted, but it does not attempt to treat input as if it were a vote or a statistical sample. In addition, many of the respondents' reasons for voicing these viewpoints are varied, subtle, or detailed. In an effort to provide a succinct summary of concerns raised, many subtleties are not conveyed in this summary.

¹ Replaced the sentence: "The project will deliver 704 MW of power to the New England energy grid." with "The project would have the capacity to deliver up to 880 MW of power to the New England energy grid, satisfying the current PPA total of 704 MW." Also, replaced the sentence: "The wind turbine generators, offshore substations, array cables, and substation interconnector cables would be located on the [Outer Continental Shelf] approximately 17.4 nautical miles (20 statute miles) south of the coast of Rhode Island." with "The wind turbine generators, offshore substations, array cables, and substation interconnector cables would be located on the Outer Continental Shelf (OCS) approximately 15 nautical miles (18 statute miles) southeast of Point Judith, Rhode Island, approximately 13 nautical miles (15 statute miles) east of Block Island, Rhode Island, approximately 7.5 nautical miles (8.5 statute miles) south of Nomans Land Island National Wildlife Refuge (uninhabited island), and between approximately 10 to 12.5 nautical miles (12 to 14 statute miles) south/southwest of varying points of the Rhode Island and Massachusetts coastlines."

3 METHODOLOGY

3.1 Terminology

The following terminology is used throughout this report:

- **Submission:** The entire content submitted by a single person or group at a single time. For example, a 1-page letter from a citizen, an e-mail with a portable document format (PDF) attachment, or a transcript of a public scoping meeting was considered to be a single submission.
- **Comment:** A specific statement within a submission that expresses a sender’s specific point of view, concern, question, or suggestion. One submission may contain many comments.
- **Substantive Comment:** Scoping submissions were reviewed to identify and categorize substantive comments. To be substantive, a comment must meet both of the following criteria:
 - **Related to the Proposed Project:** To be substantive, a comment must first relate, even tangentially, to the proposed Project, its connected actions, cumulative actions/effects, and other reasonably foreseeable actions, impacts, or conditions.
 - **More than Simple Opinion:** This criterion requires that substantive comments provide information to help BOEM prepare the EIS by providing some level of support or basis for the commenter’s position or some indication of the issues the commenter believes are significant. As a hypothetical example, the statement “BOEM should reject the Project” would not be considered substantive, but the statement “The Project should not be approved because it would harm commercial fisheries” would be considered substantive.

3.2 Comment Submittal

BOEM received submissions during the public scoping period via the following mechanisms:

- Electronic submissions received via Regulations.gov on docket number BOEM-2021-0029
- Hard-copy comment letters submitted to BOEM via traditional mail
- Emails submitted to BOEM
- Comments submitted verbally during the listening sessions of each of the three virtual public scoping meetings

Three virtual public scoping meetings were held via the Zoom webinar platform on the dates outlined in Table 1.

Table 1. Public Scoping Meetings

Date	Location	Time and Subject
May 13, 2021	Zoom virtual meeting	5:30 p.m. ET: Presentation, Listening Session, and Q&A Session
May 18, 2021	Zoom virtual meeting	5:30 p.m. ET: Presentation, Listening Session, and Q&A Session
May 20, 2021	Zoom virtual meeting	1:00 p.m. ET: Presentation, Listening Session, and Q&A Session

Note: ET = Eastern Standard Time, Q&A = questions and answers

3.3 Comment Processing

Compilation of Submissions

BOEM downloaded and reviewed all submissions from Regulations.gov. These submissions were provided in Hypertext Markup Language (html) format, while attachments provided by stakeholders as part of their Regulations.gov submission were typically provided in PDF or Microsoft Word formats. Text from html, PDF, Word, and other formats were copied from the original format into a single Microsoft Excel file that served as the primary submission database.

Emails and hard copy letters sent to BOEM were scanned as PDFs, uploaded to Regulations.gov, assigned unique docket numbers, and added to the database. A PDF version of each virtual scoping meeting transcript was provided by the Zoom webinar host to BOEM, uploaded to Regulations.gov, assigned a unique docket number, and added to the database.

Each submission entered into the database received a unique identification (ID) number. The database also included the submitter's contact information. Appendix A provides a detailed listing of all the submissions received.

One organization, the National Wildlife Federation Action Fund, provided comments on behalf of its members. The submission contained a cover letter with comment from the National Wildlife Federation Action Fund and a total of 301 individually identified form letters from members of the National Wildlife Federation Action Fund that match the comment content of the cover letter. The submission generally offered broad support for offshore wind citing environmental, economic, and public health benefits, which are captured in the comment themes discussed below.

Identification of Comments

Each submission was read to identify substantive comments (as defined in Section 3.1). Each substantive comment was entered into the primary submission database with a unique comment ID number and subsequently assigned to a NEPA resource or topic area.

4 SCOPING SUBMISSION AND COMMENT SUMMARY

4.1 Submissions

BOEM received 42 submissions during the scoping period from the public, agencies, and other interested groups and stakeholders. Table 2 shows the types of submissions received.

Table 2. Distribution of Submissions and Comments Received by Type

Submission Type	Submissions Received	Comments Received
Regulations.gov submission	33	578
Scoping meeting transcripts*	3	20
Email to BOEM representative	6	61
Total	42	659

* Each meeting transcript was treated as one submission. Each transcript contains multiple public comments.

The totals in Table 2 include the following submissions² by federal, state, and local government entities:

- Two submissions from federal agencies: U.S. Environmental Protection Agency (EPA) and National Marine Fisheries Service (NMFS).
- Four submissions from state agencies or representatives: State of Rhode Island Coastal Resources Management Council (RI CRMC), a state representative from the State of Connecticut House of Representatives, and Rhode Island Department of Environmental Management (RIDEM), who provided two submissions.
- Six submissions from local governments: City of New London (Connecticut), Town of Aquinnah (Massachusetts), Chamber of Commerce of Eastern Connecticut, Greater Providence Chamber of Commerce (Rhode Island), and the Town of New Shoreham and Southeast Lighthouse Foundation (Rhode Island), which provided two combined submissions.

In addition to the federal, state, and local government entities identified above, 22 submissions were received from non-governmental organizations and 11 comments were made by 10 non-governmental organizations (NGOs) at the scoping meetings. Some NGOs submitted comments at more than one scoping meeting as well as in writing. A list of these organizations is provided in Table 3. The remaining submissions were received from the public.

Table 3. Non-Governmental Organization Submissions

American Bird Conservancy	Oceana
American Saltwater Guides Association	Partnership for Rhode Island
BlueGreen Alliance	R.I. Party and Charter Boat Association
Business Network for Offshore Wind	RENEW Northeast
Citizens Campaign for the Environment	Responsible Offshore Development Alliance
Commercial Fisheries Center of Rhode Island	Rhode Island AFL-CIO
CT Laborers' District Council	Rhode Island Building and Construction Trades Council
Defenders of Wildlife	Rhode Island Painters and Allied Trades District Council
Environmental League of Massachusetts	Rhode Island Saltwater Anglers Association
Interdistrict Committee for Project Oceanology	Sea Services North America
International Union of Painters and Allied Trades, AFL-CIO	Southeast Lighthouse Foundation (in conjunction with the Town of New Shoreham)
International Union of Painters and Allied Trades, District Council 11	ThayerMahan, Inc.
National Audubon Society	The Acadia Center
National Wildlife Federation Action Fund	The Nature Conservancy
New England and Mid-Atlantic Fishery Management Councils	Waterson Terminal Services
New England for Offshore Wind	

Submissions were reviewed to determine the overall disposition of the submission provider toward the proposed Project. Based on this review, dispositions of the 39 unique submissions (excluding transcripts) were as follows:

² The totals in Table 2 do not add up to the submission type totals. Each meeting transcript was considered one submission, and multiple commenters representing different agencies and organizations are reflected in this section.

- Pro (generally in favor of the proposed Project): 15 (38%)
- Con (generally opposed to the proposed Project): 5 (13%)
- Neutral (no distinct disposition, or disposition could not be clearly determined): 19 (49%)

During the scoping meetings, 20 scoping comments were made and included in the three transcript submissions. The disposition of these comments were as follows:

- Pro (generally in favor of the proposed Project): 17 (85%)
- Con (generally opposed to the proposed Project): 0 (0%)
- Neutral (no distinct disposition, or disposition could not be clearly determined): 3 (15%)

4.2 Comments

A total of 659 substantive comments were identified. Table 4 shows the distribution of comments by resource and NEPA topic. The most commonly addressed resources or NEPA topics were Bats, Birds, Commercial Fishing, Effects Analysis, General Wildlife, Marine Mammals, Mitigation, and Socioeconomics.

Table 4. Distribution of Comments by Resource Addressed

Resource	Comments
Air and Climate	17
Alternatives (comparing, range)	6
Appendices	1
Aquatic habitat/species (general)	6
Bats	28
Benthic Habitat and Invertebrates	9
Birds	114
Commercial Fishing	33
Cultural Resources	17
Cumulative	22
Effects Analysis (general)	38
Environmental Justice	6
Essential Fish Habitat and Finfish	27
General Support	35
Issues, Alternatives (general)	10
Marine Mammals	89
Mitigation	31
National Environmental Policy Act Process	19
Navigation	5
Proposed Action	19
Public Involvement	6
Purpose and Need	1

Resource	Comments
Recreation	3
Sea Turtles	21
Socioeconomics	37
Suggested New Alternatives	14
Technical Editing	1
Visual Resources	10
Water Resources	3
Waters of the United States	3
Wildlife (general)	28

4.3 Definition of Resource Areas and Common National Environmental Policy Act Topics Raised

The following sections define and summarize each of the resource areas or NEPA topics addressed in the comments. Comments have been summarized, as appropriate, particularly for concerns that were raised by more than one commenter.

Air and Climate

Comments related to air quality encompassed topics such as analysis of air quality, greenhouse gas (GHG) emissions, climate change, and renewable energy. Some comments expressed support of the proposed Project as a means of reducing GHG emissions and pollution, improving air quality, supporting the local economy, addressing climate change, preserving the environment, reducing fossil fuel dependence, and meeting renewable energy goals and current and future energy needs.

Other comments included the following:

- A summary of goals established in recent executive orders under President Joseph Biden related to addressing climate change with renewable energy while continuing to protect natural and biological resources
- A review of the COP in accordance with air permitting requirements and air quality regulations and guidance for evaluating air quality impacts in the EIS
- Recommendations that the EIS evaluate and disclose net GHG emissions for all stages of the Project and impacts and benefits to climate change in addition to how the project components would be durable under sea level rise, storm surges, changing coastal currents, and severe weather events
- A recommendation that the EIS evaluate changes to seafood production due to GHG emissions
- A request that the analysis of carbon emissions include construction and transportation of project infrastructure in foreign countries

Alternatives

GENERAL ALTERNATIVES AND ISSUES

Comments related to general alternatives and issues identified areas of concern for BOEM to address in the EIS, including the evaluation and/or presentation of the following:

- Alternatives that preserve the historic integrity of the surrounding area and cultural resources
- Mitigative benefits of the proposed Project on climate change
- The interconnectedness of the offshore wind (OSW) industry and the oil and gas industry
- Net energy and the economic and environmental impacts of OSW
- Electrical benefits of OSW and their relation to energy demands or the power grid
- Inconsistencies in the positions of the U.S. Coast Guard and the developer regarding the MA/RI Port Access Route Study (MARIPARS) relative to the transit lane alternative
- The developer's power purchase agreements, as the agreements may result in inflexibility on what constitutes a reasonable range of alternatives
- The history of collaboration and negotiation that led to the transit lane alternative

COMPARING ALTERNATIVES, RANGE OF ALTERNATIVES

Comments related to comparing alternatives or to considering a range of alternatives identified a need to consider the No Action alternative and a full range of reasonable alternatives to the Proposed Action that balance project purpose and environmental impacts. More specifically, commentors asked that BOEM consider alternatives, including, but not limited to, the following:

- A range of alternatives related to location, burial depth, and spacing of onshore and offshore export cables and offshore inter array cables
- A range of alternatives related to location and spacing of wind turbine generators (WTG) beyond the 1 × 1 nm grid spacing design within the Lease Area
- A range of alternatives to every impact producing component of the COP, including infrastructure design technologies that differ from those proposed in the COP, which may pose lesser impacts on sensitive environmental resources, that could be “mixed and matched” in the final selection of the Preferred Alternative
- Analyses of the impacts of transit lanes to fishing economics, product quality, markets, fisheries management, and living marine resources that may benefit from migration corridors
- Alternatives specific to the phases of the project (siting, construction, operations, and decommissioning)
- Separate alternatives to analyze the lower bound and higher bound for the maximum operating capacity, turbine size, and number of turbines

SUGGESTED NEW ALTERNATIVES

Commentors suggested or requested that BOEM consider the following new alternatives or components of alternatives (related submission[s] / comment number[s] indicated in parentheses):

- Locate the WTGs as close as possible to energy users to minimize transmission losses (BOEM-2021-0029-0002 / 2)
- Utilize the largest WTGs in order to minimize the number of foundations constructed to meet project capacity and thereby minimize, if not completely remove, impacts to marine habitats and resources (BOEM-2021-0029-0013 / 2, BOEM-2021-0029-0019 / 4, BOEM-2021-0029-0023 / 5)
- Include at least one habitat impacts minimization alternative, one fisheries impacts minimization alternative, and one transit lane alternative in addition to the No Action alternative and the proposal outlined in the COP (BOEM-2021-0029-0023 / 5)
- A Fisheries Habitat Impact Minimization Alternative (Habitat Alternative), development of which includes micrositing and reduction of the total number of foundations installed, that is supported by location-specific benthic and habitat characterizations, the analysis of which should include discussion of the most impactful areas and least impactful areas within the Lease Area for placement of project components (BOEM-2021-0029-0019 / 2, BOEM-2021-0029-0019 / 3, BOEM-2021-0029-0023 / 5, BOEM-2021-0029-0032 / 40, BOEM-2021-0029-0035 / 5, BOEM-2021-0029-0035 / 6, BOEM-2021-0029-0041 / 4)
- A Habitat Impacts Minimization Alternative specific to the export cable to include alternative routes that avoid complex habitat, the analysis of which would require preconstruction survey work (BOEM-2021-0029-0033 / 31)
- Alternative locations within the Lease Area that would minimize impacts to sensitive habitats and other marine resources and uses, with particular focus on siting outside Cox Ledge (BOEM-2021-0029-0035 / 3)
- An alternative that utilizes common cable routing corridors with adjacent projects to facilitate avoidance and minimization of impacts to resources by reducing the number of corridors and allowing for programmatic level review and comment (BOEM-2021-0029-0035 / 7)
- An alternative that combines the most disruptive components for each option included in the design envelope (BOEM-2021-0029-0027 / 22)
- Alternatives that require developers be responsible for removing offshore wind equipment if and when their project ends and further require offshore wind developers and operators to place adequate resources in trust to ensure that decommissioning will occur regardless of bankruptcy, change of ownership or lack of profitability (BOEM-2021-0029-0021 / 20, BOEM-2021-0029-0025 / 7)
- Consideration of Responsible Offshore Development Association's layout proposal implementing designated transit lanes, each at least 4 nm wide, where no surface occupancy would occur (BOEM-2021-0029-0033 / 25, BOEM-2021-0029-0033 / 26)
- Alternative related to location and spacing of wind turbine generators (WTG) within the lease area to minimize environmental or fishing operations and transit impacts, with spacing farther apart than 1x1 nm (BOEM-2021-0029-0033 / 29)
- Alternative including infrastructure design technologies that differ from those proposed in the COP which may pose lesser impacts on sensitive environmental resources (BOEM-2021-0029-0032 / 28)
- Alternatives to avoid development of offshore wind in 1) Seasonal Management Areas; and 2) areas where persistent or long-duration Dynamic Management Areas are established and extended for more than 3 months in any 1 year of the most recent 5 years (BOEM-2021-0029-0021 / 11)

Appendices

One comment noted the confidentiality of some COP appendices and encouraged BOEM to provide an explanation for any information redacted or classified as confidential. This comment also recommended that BOEM make as much information as possible publicly available to improve transparency and access to project information, which would support the value of the NEPA process.

Aquatic Habitat/Species (general)

General aquatic habitat and species comments included identification of important habitat areas for Atlantic cod, recommendations for the EIS, and suggestions to use regional data and reports to inform impacts to protected cetacean, finfish, and sea turtle species. Commenters provided the following recommendations for inclusion in the EIS:

- The EIS should describe able installation options that can minimize the overall amount of disturbance of existing boulders and similar complex habitat, where possible.
- The EIS should contain sufficient biological and geologic information to allow for a comparison of the impacts associated with various cable routing options and construction techniques considered so that it is clear why a particular layout is preferred over another.
- The EIS should fully explain how mapping done by the applicant influenced the design and layout of the Project and depict both the WTGs and associated cables on project plans showing the limits of mapped complex bottom habitat, spawning areas, etc.
- The EIS should provide the best and most currently available information regarding benthic habitats and their potential use by cod spawning aggregations within the Lease Area.
- The EIS should describe whether construction time of year restrictions can be implemented to help reduce overall impacts to cod spawning.
- The EIS should consider potential effects of electromagnetic fields (EMFs) and their impact on fish and crustaceans.

Bats

Concerns were expressed about data limitation regarding bat fatalities from OSW facilities and insufficient information in the COP related to potential impacts on bats from the proposed Project. Due to this, one comment suggested BOEM be conservative in the analysis of potential impacts on bats. Other comments stated that a monitoring and adaptive management plan should be developed that includes commitments to standardized monitoring that would be implemented prior to construction and throughout construction and operation. These comments also suggested the use of improved technology to monitor bats and evaluate and mitigate impacts throughout the life of the Project and the use of technology to deter bats. Monitoring data should be made readily available to the public.

Comments suggested the following be included or used to support the analysis of impacts on bats from the proposed Project; of these comments, some noted necessary updates to the characterization and analysis in the COP:

- Population-level cumulative impacts from the proposed Project, other OSW development projects in the Atlantic Outer Continental Shelf (OCS), and terrestrial developments
- Data from the Motus Wildlife Tracking System and other best available science

- Consultation with the U.S. Fish and Wildlife Service on the presence of and potential impacts to bat species. Commentor indicated that multiple species of bats have been identified within or near the proposed project area, and it should therefore be assumed that other bat species not currently identified in the COP could be present.
- Land-based research for presence of bats, seasonal exposure of bats to turbines, and behavioral patterns of bats (e.g., attraction to land-based turbines) to inform the potential for collision risks and population-level declines of bats within or near the proposed project area
- Conservative estimates of bat mortality from wind facilities
- Fatality estimates scaled to the size of turbines
- An analysis area boundary that reflects existing literature
- Other OSW and non-OSW and coastal activities in the analysis of cumulative impacts on bats

Benthic Habitat and Invertebrates

Comments identified concerns for benthic habitat and invertebrates related to sedimentation and EMF impacts to invertebrates and turbine installation impacts to complex habitats. Comments included recommendations for the EIS and to avoid siting turbines on sensitive benthic habitat. Recommendations for the EIS included 1) consideration of the lack of postconstruction recovery of complex habitats to baseline conditions, as seen at the Block Island Wind Farm; 2) evaluation of how the Project may impact structurally complex hard bottom habitats in the project area such as boulder fields, ledges, and spawning; and 3) evaluation of Project-related impacts on corals and foraging habitat for lobsters.

Birds

Comments covered individual, additional species analysis; collision and displacement; and proposed mitigation measures. Topics identified for further analysis included existing seasonal distribution, aggregation, abundance, and migration routes; proposed project interference with migratory pathways; collision risk models; and inclusion of additional avian species.

Commenters urge for compliance with the Migratory Bird Treaty Act and Endangered Species Act, and expressed particular concern for nocturnal migrant birds, the movement of federally listed species between breeding areas and post-breeding staging areas in the vicinity of the project area, displacement effects, and turbine and avian interactions. General recommendations included mitigation and monitoring practices, a displacement impact analysis, the inclusion of avian species that are not federally protected, consideration of impacts to raptors, and the use of the best available data sources and science to inform the EIS.

Commercial Fishing

Comments related to commercial fishing indicated that the EIS must fully disclose existing conditions and proposed project direct, indirect, and cumulative impacts to the local commercial fishing industry and the effect it would have on the local economy based on duration and timing of construction and decommissioning activities. Comments identified economically important fisheries such as Atlantic cod, Atlantic bluefin tuna, and yellowfin tuna and expressed concerns about fishing gear conflicts with OSW infrastructure and displacement from fishing grounds. Commenters urged early and often coordination with NMFS to inform the impact analysis within the EIS.

Other recommended areas of analysis included, but are not limited to, the following:

- A complete analysis of all fisheries important to Rhode Island's charter industry
- Timing of surveys and construction to avoid peak fishing season
- Compensatory mitigation to account for impacts that cannot be avoided
- A detailed analysis of how the presence of all project structures, both visible and non-visible (e.g., WTGs, substations, and cables), including layout and spacing, would affect marine resources and fishing operations
- Cable and landing impacts to the inshore/nearshore fishery
- How the turbine placement and spacing will affect transit and ability to fish within the wind farm, including the ability for vessels to maintain maneuverability and minimize risk of fouling gear with other gear or with the turbines
- Use of updated, more comprehensive data, including 1) joining Vessel Trip Reporting, Vessel Monitoring System, and Automatic Identification System data for area-specific landings and revenue data; 2) site-specific analysis of the past 2 years in combination with a broader time frame (last 10 years) to reflect both recent operations and annual fluctuations in fishing operations and market value; and 3) recognition of any data limitations
- Impacts of potential gear loss from platforms, turbines, and undersea equipment, including power and support cables, conduits, and anchoring devices/equipment
- Species/habitat/ecosystem impacts, including EMF

Additionally, commentors expressed concern for the current process of collecting geological and geophysical survey information in site assessment plans, indicating that the current process does not allow for environmental review of the impacts of those survey activities, does not outline who is responsible for notifying mariners of survey activities, and does not provide compensation for gear loss due to survey activities.

Cultural Resources

Cultural resources comments included consultation recommendations, information, and analysis requests for the EIS, and concerns related to project impacts to historic sites and tribal resources. Comments indicated a concern for potential impacts to Tribal Cultural Properties at Quonset Point and the Southeast Lighthouse on Block Island, Rhode Island. Commenters urge compliance with Section 106 of the National Historic Preservation Act and for the recognition, respect, and collaboration with tribal governments. Commenters also assert that several historic properties have not been adequately considered and should be included in the EIS. Additional recommendations identified by commenters included the following:

- BOEM should conduct meaningful regular collaboration and consultation with tribal officials.
- Tribes should be invited to participate in the development of the Unanticipated Discovery Plan, which should include protocols concerning Tribal Cultural Properties and tribal burial sites.
- BOEM should develop and implement comprehensive best management practices to avoid, minimize, and mitigate any potential adverse impacts to historic, cultural, and natural resources.

Cumulative

Cumulative comments indicated that the EIS should consider the impacts of all existing, proposed, planned energy infrastructure projects, and reasonably foreseeable future actions in the vicinity of the Project. The EIS should include OSW development projects as well as other activities and events such as

seismic exploration and offshore oil and gas drilling. Comments also recommended that a cumulative effects analysis be expanded and refined as a standalone appendix. The following describes specific topics and recommendations identified by commenters for consideration during cumulative effects analysis:

- A programmatic ecosystem approach in conducting a cumulative impacts analysis that includes offshore, nearshore, and onshore impacts from other activities
- The cumulative effects on ocean currents, stratification, and circulation
- The cumulative effects on barriers to migration and reductions of wildlife fitness
- The cumulative impacts and risks not only to species in the vicinity of the project area but also for species that are widely distributed on the coast
- The cumulative impacts of OSW development on fishery independent surveys, leading to greater uncertainty in stock assessments
- the Biden administration's goal of building 30 gigawatts of OSW within the next 9 years, including future development in the newly identified Wind Energy Areas in the New York Bight
- A variety of turbine size and layout designs
- Long-term beneficial cumulative impacts to climate due to the reduction of fossil fuel generation

Effects Analysis (general)

Effects analysis comments included speculation about the sufficiency of an impact analysis under NEPA, general concern about the Project's potential impacts across multiple resources, and suggestions for inclusion of specific data sources. Specific concerns related to the effects of the Project included extreme weather event concerns and their potential effects on wind turbines and concerns about the size and scale of site characterization surveys and OSW construction activities on the Atlantic OCS and their effects on marine biological resources.

Several commenters submitted requests for additional analysis of effects not yet considered for the Project for inclusion in the EIS. These requests include the following:

- All costs and benefits of available alternatives, including the No Action alternative, must be considered in a cost-benefit analysis
- The temporal classification (e.g., short term or long term) defined in the EIS should be appropriate for the particular species and habitat type, and all impacts should be clearly and consistently defined
- The EIS should expand its analysis of the offshore cable transmission system to include the environmental costs and benefits of upgrades to onshore transmission systems
- The EIS must analyze how gusts and wind shifts during extreme weather events may damage turbines and negatively impact energy generation capacity
- The EIS should consider the potential safety risk for vessels navigating through the project area during periods of ice buildup on turbine blades

Environmental Justice

Comments related to environmental justice included recommendations that the EIS analyze the proposed Project's potential impacts and benefits to environmental justice communities. Specific topics mentioned for the analysis included air quality, job creation, and community funding.

Concern was expressed that without clean energy projects, there would be continued reliance on existing, and potentially new, power plants that have historically led to disproportionate impacts on nearby environmental justice populations. A request was made that the EIS incorporate existing reports that describe disproportionate health impacts on environmental justice communities.

Other comments included the following:

- A recommendation that BOEM determine if noise, air, or traffic impacts from the Project, particularly those in the North Kingstown, Rhode Island, area, would lead to community impacts that should be considered in the environmental justice analysis of the EIS
- Suggestions that BOEM use EJSCREEN to determine if the proposed Project would impact communities with environmental justice concerns and to evaluate potential environmental justice impacts related to port activities for the proposed Project
- Requests that BOEM evaluate how OSW would provide air quality benefits to environmental justice populations by displacing fossil fuel generation sources, which are frequently located within or near population centers and disproportionately located within or near environmental justice communities
- A summary of existing regulatory requirements and Executive Order 13985 (86 *Federal Register* 2009; January 20, 2021) that require federal agencies to identify and address disproportionate impacts on environmental justice populations

Essential Fish Habitat and Finfish

Comments related to essential fish habitat (EFH) and finfish addressed a range of current conditions and analysis requests as well as measures to avoid, minimize, or mitigate for potential project impacts. Topics identified for inclusion as part of the existing conditions portion of the EIS included 1) a complete list of affected species; 2) a complete list of protected species in the area; 3) water withdrawal details from construction equipment; and 4) an acoustic telemetry study to better understand the distribution and habitat of spawning cod in and around Cox Ledge.

Comments specific to EFH included a request for detailed analysis of the effects of anticipated impacts of construction, operation, and decommissioning on EFH that support sensitive life stages of fish and their spawning, breeding, and feeding activities. It was stated that the EFH should use best available data sources and science and that a habitat mapping-specific meeting should be scheduled with NMFS for the Project. Topics identified for analysis in the EIS included a range of direct, indirect, and cumulative EFH and finfish impacts from construction activities and vessel traffic. Identified impact concerns included, but are not limited to, entrainment of ichthyoplankton and zooplankton; disturbance of complex, hard bottom habitat; and EMF and acoustic impacts to finfish. Particular concerns for Atlantic sturgeon, Atlantic cod, and hard bottom habitats were communicated by several commenters and that further analysis should be included in the EIS. Comments encouraged time of year restrictions or other mitigative measures to minimize impact to marine fisheries resources, along with monitoring plans. Examples of these measures include the following:

- A plan should be developed prior to construction for vessels to identify no-anchor areas.

- The construction should be scheduled to avoid known transit periods of sturgeon.
- Wind turbines should be sited away from complex, hard bottom habitat.
- Collaborative science with fishing industries should be used to better understand the impacts associated with the Project on economically and ecologically important fishing resources.
- Site-specific benthic habitat assessments and Atlantic cod spawning surveys should be conducted to inform siting of the Project.
- A comprehensive monitoring effort should be required to include before, during, and after construction monitoring in order to document habitat disturbance and recovery.

General Neutrality

In approximately half of the submissions, including meeting transcripts (22 out of 40), commentors and comments were generally neutral or positive toward OSW and renewable energy projects and/or neutral toward the proposed Project but expressed concerns over the content of the COP and/or the process by which their environmental and/or socioeconomic concerns would be addressed. Specific concerns from these submissions are discussed in the appropriate resource sections of this report.

General Opposition

Approximately one-tenth (four out of 40) of the submissions, including meeting transcripts, included statements of opposition for the Project. Comments from these submissions cited the following detractions of the proposed Project.

- Irreversible impacts to irreplaceable resources
- Inefficiency of the Project due to transmission losses
- WTGs represent navigational hazards to humans and wildlife
- Visual impacts and sound impacts at the shoreline from the wind farm
- Economic hardship to the commercial fishing industry
- Noise and EMF impacts to wildlife
- Lack of baseline monitoring data
- Lack of funding for decommissioning
- Deficiencies in the COP
- The need for a programmatic EIS
- Ongoing project activities that are unauthorized or unanalyzed in accordance with the law

General Support

Approximately three-quarters of the submissions, including meeting transcripts (31 out of 40) included statements of support for the Project and, in some cases, also expressed concerns over the process by which their environmental and/or socioeconomic concerns would be addressed. Comments from these submissions cited the following benefits of the proposed Project:

- Reduce fossil fuel dependence
- Produce needed clean energy to meet current and future energy goals and address climate change

- Support the reduction of global GHG emissions and local and regional air pollution
- Improve air quality for vulnerable communities
- Result in electricity cost savings
- Provide socioeconomic benefits, including job creation, economic growth, sustainable economies, supply chain development, and workforce development
- Increase tourism
- Provide an energy resource that would protect the natural and biological environment in addition to cultural and socioeconomic resources
- Revitalize and reestablish railroads, interstate highway systems, and ports
- Support economic recovery from COVID-19

Marine Mammals

Comment topics identified concerns for marine mammals, particularly due to their distribution throughout the Lease Area, migration routes, potential for habitat displacement, collisions with vessels, risk of entanglement, behavior and physiological impacts from noise and vessel traffic, and general sensitivity to construction activities that may result in harassment, injury, or mortality. Comments encouraged the use of site-specific data, best available science, and local data sources to support impact determinations on marine mammals from wind farm activities. Comments also urged to consider, avoid, and mitigate effects to marine mammals, particularly the critically endangered North Atlantic right whale.

It was stated that the EIS should include a complete evaluation of the immediate and cumulative effects of the proposed Project as well as the effects of all proposed and potential wind development in the region. Comments also requested that the EIS should include alternatives to avoid development of OSW in 1) Seasonal Management Areas; and 2) in areas where persistent or long-duration Dynamic Management Areas are established and extended for more than 3 months in any 1 year of the most recent 5 years.

Comments also specifically requested that impacts to harbor porpoises be minimized and mitigated to the full extent practicable due to their sensitivity to noise. Additionally, commenters requested that BOEM work with NMFS and other relevant agencies, in conjunction with the Northeast and Mid-Atlantic Ocean Data Portals to ensure a high level of transparency in all data collected throughout OSW development, including, but not limited to, Automatic Identification System data from OSW-associated vessels, Protected Species Observer (PSO) reports, and passive acoustic detections.

A range of mitigation measures were recommended in comments to minimize the risk of habitat degradation, vessel strike, and exposure to potentially harassing or injurious levels of noise to marine mammals, including the following:

- Seasonal restrictions to avoid construction during periods of high migration and during known transit periods of North Atlantic right whales through the Lease Area
- A prohibition on initiating pile driving if a North Atlantic right whale or other protected species is detected by visual or acoustic surveys within the acoustic or visual clearance zones
- A shutdown should be required if a North Atlantic right whale or other protected species is detected in the clearance zones, unless continued pile driving is necessary for safety. If and when this exemption occurs, the Project must immediately notify NMFS with reasons and explanations for exemption, and a summary of the frequency of these exceptions must be publicly available to ensure that these are the exception rather than the norm for the Project.

- Condition for resumption of pile driving after the lead Protected Species Observer confirms that no North Atlantic right whale or other protected species has been detected within the acoustical and visual clearance zones
- Authorization of pile-driving activities, with ramp-up, only during daylight hours and good visibility conditions to maximize the probability that North Atlantic right whales are detected and confirmed to be clear of the exclusion zone
- Establishment of a minimum exclusion zone of 2,000 meters around all pile-driving activity
- Monitoring of the acoustic clearance and exclusion zone with the use of NMFS-approved Protected Species Observers and the use of passive acoustic monitoring with underwater recorders
- A visual and acoustic clearance zone extending a minimum 5,000 meters in all directions from the location of the driven pile
- Implementation of a speed restriction of 10 knots for all vessels operating within or transitioning to/from lease areas at all times except in limited circumstances where the best available scientific information demonstrates that whales do not use the area
- Vessels to maintain a separation distances of 500 meters for North Atlantic right whales
- All personnel working offshore to receive training on observing and identifying North Atlantic right whales and other large whale species
- Implementation of commercially feasible and effective noise reduction and attenuation measures to the fullest extent feasible

Mitigation

Comments stated that the EIS should include all mitigation practices clearly and that development of additional and compensatory mitigation measures should be provided. Comments included requests to develop and implement robust monitoring, avoidance, and mitigation measures informed by current science and employing latest technologies. Commenters also requested that mitigation and monitoring measures should be informed by stakeholder and agency input, include continued monitoring, use the adaptive management approach, and should tier to other regional wind farm projects, studies, and lessons learned from other wind farm projects. In addition, commenters called for the investment of research and development to collect and store baseline data in a central, publicly available data portal to serve as a clearinghouse for all OSW-related scientific and technological research, and for the development of ecosystem-wide best management practices based on the data. Comments indicated that the Project would contribute to the mitigation of climate change impacts by reducing regional fossil fuel generation.

Additional mitigation concerns and suggestions are addressed in specific resource sections throughout this report.

National Environmental Policy Act Process

NEPA process comments addressed the way in which the EIS will be prepared. Typical comments under this topic covered the scoping process; public meetings, notification, or other involvement; alternatives development; resources for analysis in the EIS; consultation with agencies, State Historic Preservation Officers and/or Native American tribes; or other procedural issues, including agency federal consistency reviews. It was stated that close coordination with the U.S. Army Corps of Engineers, NMFS, appropriate state Coastal Zone Management offices, the Environmental Protection Agency, and others would be essential for portions of the proposed Project that falls under each agency's jurisdiction.

As part of the NEPA process for the proposed Project, commenters encouraged BOEM to do the following:

- Complete an expeditious and thorough environmental review of the Project
- Align the federal consistency review process with the NEPA process so the draft EIS would be available to inform the federal consistency decision
- Include as part of the EIS 1) a thorough analysis of impacts on natural, biological, cultural, and socioeconomic resources; 2) an evaluation of cumulative impacts; 3) a determination of necessary monitoring and adaptive management; and 4) an examination of a reasonable range of alternatives and mitigation strategies
- Notify agencies of any changes to the COP with a description of the changes; ensure information is complete at the start of a review period to avoid the need for multiple reviews later and potential delays
- Make a reasonable attempt to obtain and disclose data necessary to support the analysis of potential environmental impacts from the proposed Project
- Develop a programmatic EIS for all leasing activities in the Atlantic Ocean
- Apply lessons learned from past projects to the proposed Project and future development and review to alleviate the number of projects that stakeholders must review and comment on

Other commenters expressed concern about recent changes in NEPA regulations, some of which remain in flux. One comment described the absence of fisheries monitoring and communication plans in the COP, which would require action from BOEM related to the NEPA process.

Navigation

Comments related to navigation included concerns regarding fishing feasibility throughout the project area and fishing gear use over portions of the cable that cannot be buried due to seabed conditions. Commenters expressed that fishing operations would be altered during operation and possibly after decommissioning of the Project. Comments asserted that 1 nm of spacing does not provide adequate space for the large number of mariners traveling through the project area and that mariners will experience numerous marine incidents, causing excessive vessel damage and vessel loss along with major injuries that trigger insurers to void coverage through exclusions in their policies.

Proposed Action

Proposed Action comments requested additional information or clarification on a range of proposed project components such as the project layout, including array design and spacing, turbine size, cable burial depth, project schedule, decommissioning, and bond coverage. It was stated that the COP must provide enough specifics on decommissioning and should disclose economic considerations of decommissioning, including the estimated cost of decommissioning and the amount of bonds funded as part of environmental review required by NEPA. Comments also indicated that the EIS should disclose the project schedule in relation to project decisions and environmental and economic effects concerning the workforce and changing OSW technology. One comment stated developers should be explicitly responsible for the costs and activities associated with removal of offshore infrastructure, and taxpayers should not be financially responsible in the event that a developer becomes bankrupt or experiences a change in ownership or profitability.

Additional requests for and information on the Proposed Action was requested and included the following:

- More information on larger turbine size in the project design envelope and a complete analysis of differences in environmental impacts from various turbine sizes and associated materials, as larger turbine sizes than disclosed in the COP (8-12 MW) could be feasible
- A project layout designed to minimize instances where cables transect fishing tow areas
- A minimum 8- to 10-foot cable burial depth to avoid fishing gear interactions
- Clear standards for cable burial depth and how it is determined in addition to monitoring protocols to ensure the cable remains adequately buried
- Consideration of implications of the proposed Project to future regional energy transmission, including landfall of transmission cables
- A detailed timeline for construction activities
- A request that decommissioning be consistent with construction in terms of environmental protections and constraints; upon decommissioning, the Lease Area should be returned to its natural state as a requirement of its lease terms
- Details of proposed decommissioning activities
- Address a reasonable range of alternatives for decommissioning in the EIS, including alternatives for decommissioning raised through scoping. Alternatives should include cable decommissioning that remove all cables and related materials and infrastructure rather than leaving buried cables in place.
- Include descriptions of any approved methods for removing turbine structures from the seabed and if explosives are to be used during decommissioning, in which case the NEPA review should assess impacts to benthic habitat and fishery resources from decommissioning. Other additional information should be included, such as estimated length of cables that will not be removed, volume and type of materials left in or under the seafloor, time needed to remove turbines, decommissioning process for onshore components, level of GHG emissions generated during decommissioning, how deep turbines would be cut off their bases, how much of turbines would be recycled, the process for extending the lease if turbines were to be recycled instead of decommissioned, the process for the public to comment on decommissioning, how much scour would be removed, and what would happen if the developer could not afford decommissioning.
- Discuss onshore grid capacity when considering costs and benefits of new OSW projects in addition to including an analysis of capacity and needs of the existing electrical grid to determine if early decommissioning may occur
- A statement attesting to the fact that the activities and facilities as proposed in the COP are or will be covered by an appropriate bond or other approved security

Public Involvement

Multiple comments noted the importance of stakeholder engagement and public involvement in the decision-making process for the proposed Project. Specifically, these comments described the following:

- BOEM is urged to conduct an expeditious and thorough analysis using the best available science and data and an inclusive stakeholder engagement process.

- The public comment period should be bear weight in decision-making throughout the life of the proposed Project.
- Scoping comments support BOEM's development of a comprehensive EIS by helping to identify and discuss measures to reduce, avoid, or mitigate environmental impacts. Scoping comments also inform the permitting of the Project.
- BOEM should continue working closely with federal agencies and tribes with relevant air, water, and natural resource responsibilities throughout the development of the EIS.
- The involvement of the public and other stakeholders in the scoping process helps shape the analysis by identifying critical issues to be analyzed in the EIS, the scope of the action itself, and reasonable alternatives to the action that could reduce or avoid environmental impacts.
- BOEM should make all decision-making data available for public review to support any conclusions in the EIS, particularly significant and unavoidable impacts that cannot be fully mitigated.

Several comments specifically described concerns or needs related to the involvement of the fishing industry. One comment noted the month of May as being a busy month for Rhode Island's charter fishing industry, which made it difficult for some members to participate in virtual scoping meetings for the Project. Another commentor urged BOEM to continue expanding upon past coordination with the fishing industry and state and federal agencies charged with protecting fishing and marine mammal resources.

Purpose and Need

Comments that relate to the purpose of and need for the proposed Project itself (i.e., the justification for constructing and operating the proposed Project) stated that purpose and need must not predetermine the agency's decision and should fulfil the agency's purpose and need rather than the applicant's and should include the following:

- Purpose and need should incorporate the overarching purpose in conjunction with action-specific legislation, which in this case is the Outer Continental Shelf Lands Act (OCSLA). An appropriate purpose and need statement for this action would lead BOEM to prioritize OCSLA and NEPA's focus on environmental safeguards and eliminating damage to the environment.
- The purpose and need cited by OSW developers, states, and the Biden administration are mitigation of climate change and job creation, which should be stated as such in the EIS and thoroughly evaluated in the EIS document.

Recreation

Comments regarding recreation included positive speculation of the effects on tourism due to the construction of the Project and cited an increase in visitation trends in Rhode Island from the installation of the Block Island Wind Farm. Commentors indicated that purposeful community engagement may temper negative public opinion of the Project and that wind farm ecotourism should be incorporated into stakeholder negotiations and economic analyses.

Sea Turtles

Comments specific to sea turtles requested that the EIS consider cumulative impacts for all impact-producing factors from concurrent projects and to disclose seasonal distribution, abundance, and migration routes as well as an analysis of behavior and physiological impacts from vessel traffic, noise, foundation lighting, and EMF. Recommendations for acoustic impact analysis and mitigation measures

were also included in several comments. Commenters also made suggestions on data collection techniques to improve surveying and baseline models.

Socioeconomics

Socioeconomic comments that expressed support of the proposed Project described the benefits related to jobs, local and regional businesses and economies, and community revitalization. Comments that were not supportive of the Project described adverse socioeconomic impacts related to the following:

- Property, structure, infrastructure or resource damage, increasing insurance costs, and reduced economic viability of coastal communities due to sea level rise and increasing storm severity and frequency
- Declines in or damages to fisheries resources that affect fisheries industries

Comments of concern were received related to potential impacts to quality of life from noise levels, the lack of a BOEM-led economic cost-benefit analysis for OSW, and the number of jobs and other economic benefits going to foreign countries due to a current lack of a U.S.-based supply chain.

Comments noted the need for a robust analysis of socioeconomic impacts associated with the COP and in compliance with NEPA that would encompass demographics, employment, and economics. Specifically, topics that should be included for analysis in the EIS include the following:

- Applicant commitments surrounding use of domestic content, Project Labor Agreements, Community Benefits Agreements, utilization of registered apprentices and other labor-management training programs, protection against worker misclassification and wage theft, neutrality agreements, local hire, and the prevailing wage
- Evaluation of programs necessary for training and expanding the domestic workforce, particularly for displaced workers and workers from environmental justice communities
- Changes to or displacement of local tourism, fisheries, and other industries and associated jobs
- Changes to the stability and prices of energy
- Inclusion of peer-reviewed information regarding the economic costs and benefits of OSW
- Estimates of all aspects of costs for the Project, including the contract price for power purchase agreements; the amount of federal, state and local subsidies; projections of costs to taxpayers; and costs that will accrue to foreign markets
- Potential for economies of scale
- Estimates of the number of jobs that would be sourced from local communities

Technical Editing and Document Structure

One comment was received related to technical editing. This comment recommended BOEM do the following:

- Incorporate all figures, plans, tables, etc. into the EIS rather than being referenced in other documents to improve the presentation of and ease of access to supporting information
- Create hyperlinks to all supporting documents referenced in the EIS
- Make all referenced materials available to the reader
- If documents or other supporting materials could not be incorporated into the EIS, add them to an appendix to the EIS

- If any of the above could not be accommodated, provide sufficient detail to help the reader locate a document

One comment was received regarding the structure of the EIS document and recommended BOEM do the following:

- Similar to the structure of the draft COP, the EIS discussion of the alternatives and comprehensive analyses associated with each should be grouped into the three corresponding elements of the proposed Project: 1) wind farm area; 2) offshore export cable routes and associated corridors; and 3) inshore export cable routes and associated corridors and landfall points.

Visual Resources

Commenters expressed several concerns about visual and aesthetic impacts at sunset, particularly on Block Island at Southeast Lighthouse and at Gay Head Light in Aquinnah, Massachusetts. Commentors stated that the view at Gay Head Light would be significantly altered with the presence of the wind turbines and that visual simulations of the views at Gay Head Light and Gay Head Cliffs during sunset should be included in the EIS. Commenters expressed concerns that the energy production capacity of the Revolution Wind Farm up to 880 MW would result in adverse visual impacts to historic properties and the Southeast Lighthouse.

Visual resource comments also included concerns about Revolution Wind's Visual Impacts Assessment (VIA), included as Appendix U3 in the COP. The concerns included the following:

- The VIA is limited in scope and does not provide enough information.
- The VIA does not include many historic properties.
- The VIA does not address visual impacts from construction lights during nighttime hours and turbine base lights.

Commentors recommend that BOEM should conduct additional visual assessments to include the following:

- An accurate assessment of adverse impacts and to determine appropriate avoidance, minimization, or mitigation measures from additional vantage points
- Vantage point visual simulations at all historic districts and all National Historic Landmarks
- Consideration of the visual impacts from lights during construction and turbine base lights

Water Resources

Water quality comments included concerns regarding sedimentation, pollution, ballast discharge, adherence to federal and state standards, and discharge permits. Comments requested that the EIS describe how the Project will be consistent with all federal authorities regulating vessel discharges. Additionally, commentors requested that BOEM assess and manage contamination from dredged spoils from inshore, nearshore, and harbor maintenance, and contamination from disposal of onshore materials.

Waters of the United States

Commenters stated that the EIS must document compliance with the Clean Water Act and suggested that BOEM work with the Rhode Island Department of Environmental Management and other relevant state and local agencies to avoid impacts to freshwater wetlands. Comments also requested a revision to the interconnection facility design to avoid clearing, grading, filling, or other soil-disturbing activity in order

to avoid and minimize impacts to wetlands and forested habitat by shifting the facility work zone south, away from perimeter wetlands.

Several comments specifically focused on the effect's analysis and measures for avoidance/minimization/mitigation to be incorporated into the EIS, as follows:

- The EIS should include an evaluation of ways in which each alternative can be designed to avoid, or, where unavoidable, minimize direct and indirect impacts to wetlands and other waters, and that the evaluation of direct and indirect impacts should fully consider both temporary and permanent impacts.
- The EIS should include an evaluation of indirect impacts such as clearing impacts for the proposed terrestrial construction activities resulting in permanent or temporary wetland cover type conversions and water quality, erosion, and sedimentation impacts to wetlands and water bodies.

Wildlife (general)

Comments identified a range of potential project impacts to biological resources in the project area that should be considered during EIS preparation. These topics included potential behavioral and physiological impacts from noise, altered water quality, foundation lighting, habitat alteration, increased vessel traffic, turbidity and sedimentation, and electromagnetic/magnetic fields. Comments raised concerns about the wind turbines and routing stated that the EIS should identify measures that minimize individual and population-level impacts to biological resources, such as routing to avoid sensitive habitat areas; attenuation or elimination of noise; and seasonal construction windows (e.g., time of year and time of day). Commenters expressed concerns to habitats and opposition due to potential impacts to the natural environment as well as requests for the EIS to consider direct, indirect, and cumulative project impacts to habitat alteration and fragmentation across coastal ecosystems (inshore, intertidal, and terrestrial zones). In particular, comments expressed concerns that the Revolution Wind Farm has not sited the foundations and cables to avoid Areas of Particular Concern, such as glacial moraines. Comments stated that the Project has been sited over a biologically important area for many aquatic species—Cox Ledge—and that a thorough analysis of baseline environmental conditions should be conducted to understand the complexity of the area.

Comments included recommendations such as the following:

- The EIS should acknowledge uncertainties regarding the influence of climate change on coastal and marine species and habitats when considering potential project impacts.
- The EIS should include a range of alternative to prohibit high resolution geophysical surveys.
- The EIS should include protective measures for North Atlantic right whales during high-resolution geophysical surveys and construction activities.
- The EIS should include clear mitigation and monitoring requirements for all pile-driving activity.
- BOEM should engage with NMFS in early and continued consultations, and maintain compliance with the Fish and Wildlife Coordination Act.
- The EIS should include detailed monitoring plans for pre- and postconstruction.
- The EIS should evaluate cumulative impacts of project construction, operation, and decommissioning as it relates to other projects.
- The ecological impacts resulting from the loss of seabed and associated benthic communities and forage base should be evaluated.

Many comments specific to a particular biological resource are discussed above in their appropriate section.

This page intentionally left blank.

APPENDIX A

List of Submission IDs, Names, and Affiliations

Table A-1 lists the submission ID, name, and agency or organization affiliation (as appropriate) for each person who provided a scoping submission.

Table A-1. Scoping Contact Information

Submission ID	First Name	Last Name	Title	Organization Name*	Address	City	State	Zip	Phone	Email
BOEM-2021-0029-0002	Kathleen	Roche				Bend	OR	97701	13077609325	kathleensroche@gmail.com
BOEM-2021-0029-0003	Richard	Hine	Chief Operating Officer	ThayerMahan, Inc.	120B Leonard Drive	Groton	CT	06340	860-785-9994	rhine@thayermahan.com
BOEM-2021-0029-0004	Keith	Brothers	Business Manager	CT Laborers' District Council			CT			
BOEM-2021-0029-0005	Joseph	Gresko	State Representative	State of Connecticut House of Representatives	Legislative Office Building Room 4006	Hartford	CT	06016	8602408585	Joseph.Gresko@cga.ct.gov
BOEM-2021-0029-0006	Michael	Passero	Mayor	City of New London, Office of the Mayor	181 State Street	New London	CT	06320	8604475201	rmeneses@newlondonct.org
BOEM-2021-0029-0007	Jamie	O'Brien				Aquinnah	MA	2535	6462658361	jamieobrien1@gmail.com
BOEM-2021-0029-0008	Jim	McCauley	Executive Director	Interdistrict Committee for Project Oceanology	1084 Shennecossett Road	Groton	CT	06340	8604459007	jmccauley@oceanology.org
BOEM-2021-0029-0009	Justin	Kelley	Business Representative	International Union of Painters and Allied Trades, District Council 11	269 Macklin Street	Cranston	RI	02920	4013160382	jkelly@iupatdc11.com
BOEM-2021-0029-0010	Brian	Chmielecki			162 Merchants Ave	Taftville	CT	06380		cwren112411-4ta@yahoo.com
BOEM-2021-0029-0011	Joel	Merriman	Director, Bird-Smart Wind Energy Campaign	American Bird Conservancy		Washington	DC		(202) 888-7471	jmerriman@abcbirds.org
BOEM-2021-0029-0012	Susannah	Hatch	Regional Lead	New England for Offshore Wind						shatch@environmentalleague.org
BOEM-2021-0029-0013	Jeffrey	Willis	Executive Director	State of Rhode Island, Coastal Resources Management Council	Oliver H. Stedman Government Center 4808 Tower Hill Road, Suite 3	Wakefield	RI	02879-1900	4017833370	eskeehan@crmc.ri.gov
BOEM-2021-0029-0014	Gregory	Papp	Masters of Marine Affairs	University of Washington, School of Marine and Environmental Affairs*		Seattle	WA	98125	2408930588	gpapp7@gmail.com
BOEM-2021-0029-0015	Capt. Rick	Bellavance	President	R.I. Party and Charter Boat Association	P.O. Box 171	Wakefield	RI	02880	4017415648	rickbellavance@gmail.com
BOEM-2021-0029-0016	Brian	Thibeault	RILA VP	Rhode Island Lobstermen's Association*		West Kingston	RI	02892	401-932-8250	kwe5tbos90@yahoo.com
BOEM-2021-0029-0017	Stephen	Medeiros	President	Rhode Island Saltwater Anglers Association	P.O. Box 1465	Coventry	RI	02816	4018262121	stevem@risaa.org
BOEM-2021-0029-0018	Leonard	Butler	Advisory Board Chair	Town of Aquinnah, MA						len.butler@comcast.net
BOEM-2021-0029-0019	Timothy	Timmermann	Director	U.S. Environmental Protection Agency, Region I	5 Post Office Square Suite 100	Boston	MA	02109-3912	6179181025	timmermann.timothy@epa.gov
BOEM-2021-0029-0020	Willy	Goldsmith, Ph.D.	Executive Director	American Saltwater Guides Association					6177633340	willy@saltwaterguidesassociation.org
BOEM-2021-0029-0021	Beth	Lowell	Deputy Vice President, US Campaigns	Oceana	1025 Connecticut Avenue, NW, Suite 200	Washington	DC	20036	2028333900	gbrogan@oceana.org
BOEM-2021-0029-0022	Lijing	Mei				Seattle	WA	98105		lmei24@uw.edu
BOEM-2021-0029-0023	Thomas	Nies	Executive Director, New England Fishery Management Council	New England and Mid-Atlantic Fishery Management Councils						tnies@nefmc.org
BOEM-2021-0029-0024	Jeremy	McDiarmid	Vice President, Policy and Government Affairs	Northeast Clean Energy Council*	31 Milk Street P.O. Box 961390	Boston	MA	2196		jmcdiarmid@necec.org

Submission ID	First Name	Last Name	Title	Organization Name*	Address	City	State	Zip	Phone	Email
BOEM-2021-0029-0025	Frederick	Mattera	Executive Director	Commercial Fisheries Center of Rhode Island	P.O. Box 5161,	Wakefield	RI	2880		fredmattera@cfcri.org
BOEM-2021-0029-0026	Francis	Pullaro	Executive Director	RENEW Northeast	PO Box 383	Madison	CT	6443		fpullaro@renew-ne.org
BOEM-2021-0029-0027				National Wildlife Federation, Natural Resources Defense Council, National Audubon Society, et al.*						pasha@pashafeinberg.com
BOEM-2021-0029-0028	Ross	Gould	Vice President for Supply Chain Development	Business Network for Offshore Wind	1340 Smith Avenue, Suite 200	Baltimore	MD	21209		rossgould@offshorewindus.org
BOEM-2021-0029-0029	Amber	Hewett		National Wildlife Federation Action Fund	1200 G Street NW, Suite 900	Washington	DC	20005		evansz@nwf.org
BOEM-2021-0029-0030	Jason	Walsh	Executive Director	BlueGreen Alliance						iwells@bluegreenalliance.org
BOEM-2021-0029-0031	Adrienne	Esposito	Executive Director	Citizens Campaign for the Environment						lburch@citizenscampaign.org
BOEM-2021-0029-0032				Defenders of Wildlife						srajan@defenders.org
BOEM-2021-0029-0033	Annie	Hawkins	Executive Director	Responsible Offshore Development Alliance						annie@rodafisheries.org
BOEM-2021-0029-0034	William	Cook	Special Counsel	Town of New Shoreham and Southeast Lighthouse Foundation						will@culturalheritagepartners.com
BOEM-2021-0029-0035	Michael	Pentony	Regional Administer	National Oceanic and Atmospheric Administration, National Marine Fisheries Service	55 Great Republic Drive	Gloucester	MA	01930-2276		
BOEM-2021-0029-0036	Kenneth	Rigmaiden	General President	International Union of Painters and Allied Trades, AFL-CIO	7234 Parkway Drive	Hanover	MD	21076		
BOEM-2021-0029-0037	Christopher	Waterson		Waterson Terminal Services						
BOEM-2021-0029-0037	Patrick	Crowley		Rhode Island AFL-CIO, Secretary Treasurer						
BOEM-2021-0029-0037	Stephen	Coan		Mystic Aquarium, President*						
BOEM-2021-0029-0037	David	Langlais		Rhode Island Building and Construction Trades Council, VP, Rhode Island Ironworkers, Business Manager						
BOEM-2021-0029-0037	Tony	Sheridan		Chamber of Commerce of Eastern Connecticut						
BOEM-2021-0029-0037	Laurie	White		Greater Providence Chamber of Commerce, RI						
BOEM-2021-0029-0037	Joe	Walsh		IBEW Local Union 99, Business Manager*						
BOEM-2021-0029-0037	Timmons	Roberts		Brown University, Institute at Brown for Environment and Society, Professor*						
BOEM-2021-0029-0038	Amy	McLean		The Acadia Center						
BOEM-2021-0029-0038	Michael	Sabitoni		Rhode Island Building and Construction Trades Council, President						
BOEM-2021-0029-0039	Gregory	Mancini		Build Rhode Island, Executive Director and General Counsel*						
BOEM-2021-0029-0039	Shiloh	Felton		National Audubon Society						
BOEM-2021-0029-0039	Gordon	Videll		Sea Services North America, CEO						

Submission ID	First Name	Last Name	Title	Organization Name*	Address	City	State	Zip	Phone	Email
BOEM-2021-0029-0039	Hillary	Bright		BlueGreen Alliance, Director of Special Projects						
BOEM-2021-0029-0039	Justin	Kelley		Rhode Island Painters and Allied Trades District Council 11, Business Representative						
BOEM-2021-0029-0039	Julia	Livermore	Supervising Biologist	Rhode Island Department of Environment, RI DEM						
BOEM-2021-0029-0039	Thomas	Giordano		Partnership for Rhode Island, Executive Director						
BOEM-2021-0029-0039	Jon	Lang		Maritime Whale*						
BOEM-2021-0029-0039	Susannah	Hatch		Environmental League of Massachusetts, Clean Energy Coalition Director						
BOEM-2021-0029-0039	Brian	Chmielecki			162 Merchants Avenue	Taftville	CT	06380		cwren112411-4ta@yahoo.com
BOEM-2021-0029-0040	Brian	Chmielecki			162 Merchants Avenue	Taftville	CT	06380		cwren112411-4ta@yahoo.com
BOEM-2021-0029-0041	John	Torgan	Rhode Island State Director	The Nature Conservancy	159 Waterman Street	Providence	RI	02906	4013317110	
BOEM-2021-0029-0042	William	Cook	Special Counsel	Town of New Shoreham and Southeast Lighthouse Foundation						will@culturalheritagepartners.com
BOEM-2021-0029-0044	Conor	McManus	Chief of Marine Fisheries	Rhode Island Department of Environment, RI DEM	235 Promenade Street, Room 425	Providence	RI	02908		

* Organization name is provided for affiliation purposes. If the submission was not made on behalf of the affiliation, then that is denoted with an asterisk (*).

This page intentionally left blank.