New England Wind

AVANGRID RENEWABLES

Draft Construction and Operations Plan Addendum for the Phase 2 Offshore Export Cable Corridor South Coast Variant

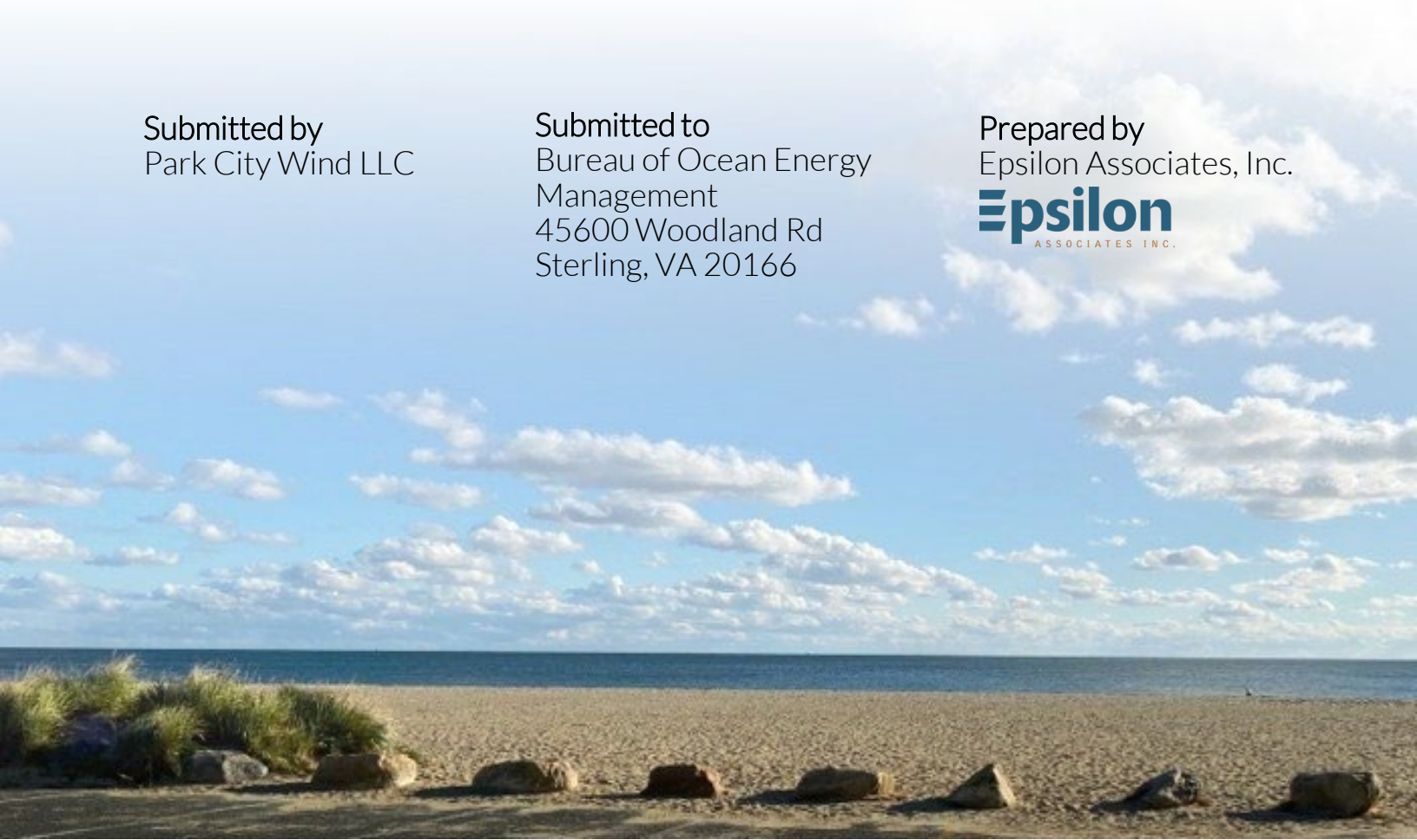
Appendices

April 2022

Submitted by
Park City Wind LLC

Submitted to
Bureau of Ocean Energy Management
45600 Woodland Rd
Sterling, VA 20166

Prepared by
Epsilon Associates, Inc.



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Submitted to:
BUREAU OF OCEAN ENERGY MANAGEMENT
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April 2022

Appendix H

Coastal Zone Management Act Consistency Certifications

1. New England Wind Phase 2 OECC South Coast Variant Massachusetts Coastal Zone Management Act Consistency Certification

2. New England Wind Phase 2 OECC South Coast Variant Rhode Island Coastal Zone Management Act Consistency Certification

New England Wind Phase 2 Offshore Export Cable Corridor South Coast Variant

Massachusetts Coastal Zone Management Act Consistency Certification

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April 2022

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1.0 INTRODUCTION

New England Wind is the proposal to develop offshore renewable wind energy facilities in Bureau of Ocean Energy Management (BOEM) Lease Area OCS-A 0534 along with associated offshore and onshore cabling, onshore substations, and onshore operations and maintenance (O&M) facilities. Park City Wind LLC, a wholly owned subsidiary of Avangrid Renewables, LLC, is the Proponent and will be responsible for the construction, operation, and decommissioning of New England Wind. Figure 1.0-1 provides an overview of New England Wind. The Proponent has prepared this federal Consistency Certification to demonstrate that New England Wind will comply with and will be conducted in a manner consistent with the enforceable policies of the approved Massachusetts Coastal Management Programs (MA CMPs).

The Proponent filed its draft New England Wind Construction and Operations Plan (COP) with BOEM on July 2, 2020, with a subsequent update on December 17, 2021. New England Wind's offshore wind facilities within all of Lease Area OCS-A 0534 and the southwest portion of Lease Area OCS-A 0501, referred to as the Southern Wind Development Area (SWDA), will be developed in two Phases: Phase 1 (also known as Park City Wind) and Phase 2 (also known as Commonwealth Wind). Four or five offshore export cables (two for Phase 1 and two or three for Phase 2) will transmit electricity generated by the wind turbine generators (WTGs) to onshore transmission systems (see Figure 1.0-1). New England Wind's wind turbine generators (WTGs), electrical service platforms (ESPs), inter-array cables, inter-link cables, and portions of the offshore export cables are in federal waters.

The Proponent has identified an Offshore Export Cable Corridor (OECC) for the installation of the offshore export cables (see Figure 1.0-1). The OECC travels north from Lease Area OCS-A 0534 along the eastern side of Muskeget Channel towards landfall sites in the Town of Barnstable, Massachusetts. The expected grid interconnection point for both Phases of New England Wind is the West Barnstable Substation. While the Proponent intends to install all Phase 2 offshore export cables within this OECC, the Proponent has identified two variations of the OECC that may be employed for Phase 2: the Western Muskeget Variant (which passes along the western side of Muskeget Channel) and the South Coast Variant (which connects to a potential second grid interconnection point) (see Figure 1.0-1). These variations are necessary to provide the Proponent with commercial flexibility should technical, logistical, grid interconnection, or other unforeseen issues arise during the Construction and Operations Plan (COP) review and engineering processes.

The Proponent has submitted a draft New England Wind COP that describes the OECC and both potential Phase 2 OECC variants, with accompanying data and analysis for the OECC and the Western Muskeget Variant. The purpose of this COP Addendum is to provide relevant data and analysis supporting the South Coast Variant in federal waters for New England Wind. This COP Addendum incorporates by reference the analyses in the COP (including the appendices) and is focused on describing impacts that are unique to the South Coast Variant. Accordingly, descriptions of impacts that are associated with the OECC or its variants more generally and that are not specific to the South Coast Variant are not repeated in this COP Consistency Certification.

In June 2020, the Proponent submitted a statement of consistency with the Massachusetts Coastal Zone Management's (MA CZM) enforceable program policies to the Massachusetts Executive Office of Energy and Environmental Affairs (EEA #16231) and MA CZM as Attachment E of the New England Wind 1 Connector Environmental Notification Form (ENF)[1]. The consistency statement was prepared for the portions of Phase 1 in state jurisdiction (referred to as New England Wind 1 Connector). In December 2021, the Proponent submitted a federal consistency review that addressed both Phases 1 and 2 of New England Wind in state jurisdiction, as well as New England Wind activities in federal waters "with reasonably foreseeable effects on any land or water uses or natural resources of the Massachusetts coastal zone," in accordance with 301 CMR Part 20.04(1). This federal consistency review builds upon the previous consistency statement providing relevant data and analysis supporting the South Coast Variant in federal waters.

A summary of the South Coast Variant is provided in Section 2. Section 3 describes the supplemental information about the South Coast Variant and how it relates to the Massachusetts Ocean Management Plan. Based upon the analyses presented herein and in the COP the Proponent certifies to the MA CZM that:

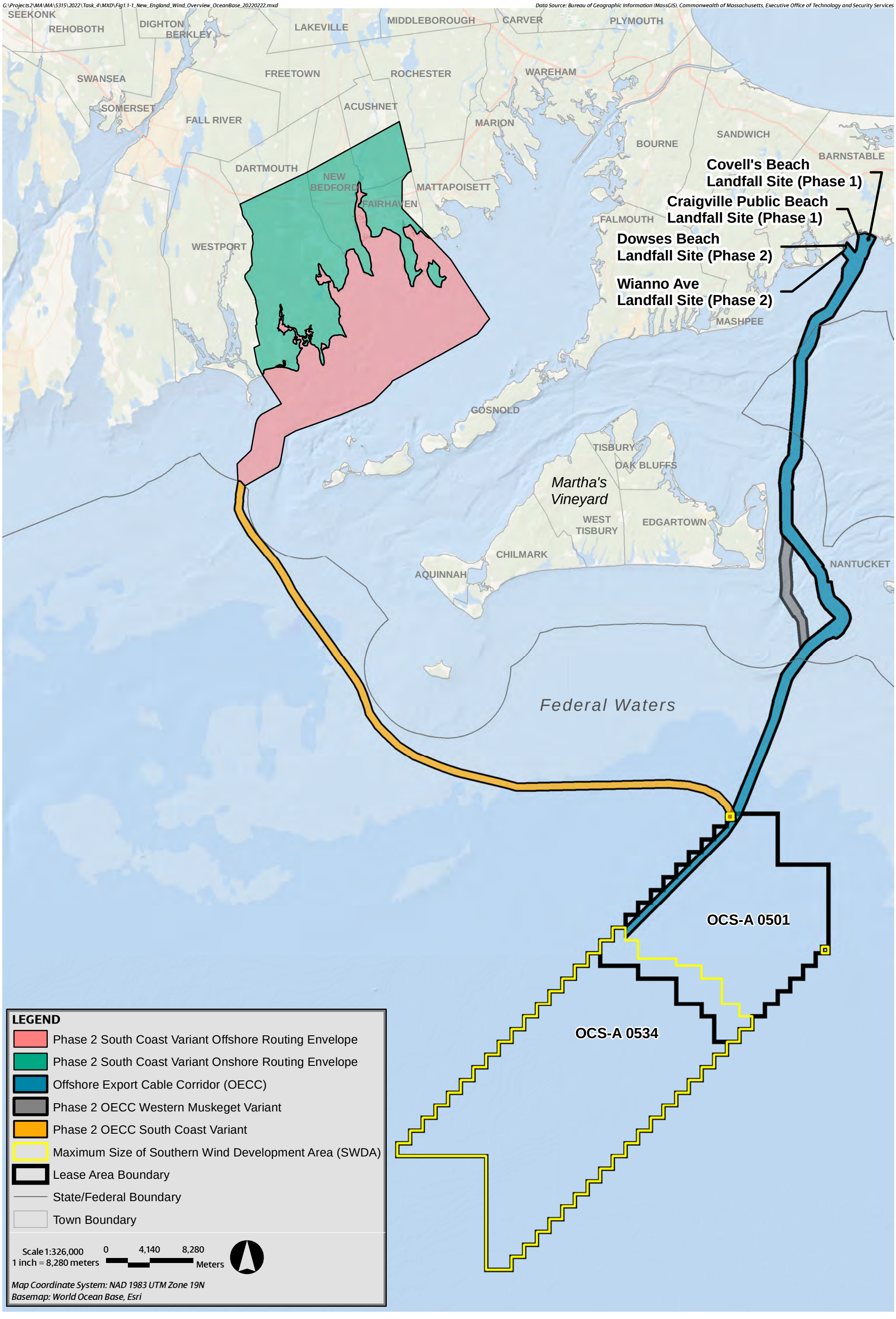
> *The proposed activities described in detail in the New England Wind COP comply with Massachusetts' approved coastal management program and will be conducted in a manner consistent with such program.*

This certification is made in accordance with the requirements of the Federal Coastal Zone Management Act (16 U.S.C. 1451 et seq.) and implementing regulations at 15 CFR Part 930, Subparts D and E; 301 CMR 20.00; and the relevant statutory and regulatory authorities for the Commonwealth of Massachusetts' Coastal Zone Management Plan and Program Policies.

[1] At the time the ENF was filed, the proposed development was referred to by its previous name "Vineyard Wind Connector 2."

G:\Projects2\MA\MA\5315\2022\Task_4\MXD\Fig1.1-1_New_England_Wind_Overview_OceanBase_20220222.mxd

Data Source: Bureau of Geographic Information (MassGIS), Commonwealth of Massachusetts, Executive Office of Technology and Security Services



New England Wind

AVANGRID RENEWABLES

Figure 1.0-1

New England Wind Overview

2.0 SUMMARY OF THE NEW ENGLAND WIND PHASE 2 OECC SOUTH COAST VARIANT

2.1 Overview

The South Coast Variant is included in the COP to provide the Proponent with the commercial flexibility required should technical, logistical, grid interconnection, or other unforeseen issues arise during the COP review and engineering processes that preclude one or more Phase 2 export cables from interconnecting at the West Barnstable Substation. If it becomes necessary to employ the South Coast Variant and a second grid interconnection point is secured, the Proponent understands that BOEM would conduct a supplemental review of the South Coast Variant within state waters and the corresponding onshore route(s) to the second grid interconnection point.

The South Coast Variant would only be employed if one or more Phase 2 offshore export cables need to interconnect at a second grid interconnection point. Unexpected scenarios that could potentially necessitate the use of the South Coast Variant include, but are not limited to:

- further detailed engineering identifies technical issues with landing one or more Phase 2 offshore export cables at potential landfall sites in Barnstable;
- additional detailed engineering identifies technical issues with installing one or more Phase 2 cables within roadway layouts and utility rights-of-way (ROWs) to reach the West Barnstable Substation; and/or
- grid interconnection issues at the West Barnstable Substation arise that are beyond the Proponent's control.

As shown in Figure 1.0-1, the South Coast Variant diverges from the OECC at the northern boundary of Lease Area OCS-A 0501 and travels west-northwest through federal waters to the Massachusetts state waters boundary near Buzzards Bay. At the Massachusetts state waters boundary, the South Coast Variant broadens to a "Phase 2 South Coast Variant Offshore Routing Envelope" that indicates a region within Buzzards Bay where the Phase 2 offshore export cable(s) may be installed before making landfall along the southwest coast of Massachusetts within the Offshore Routing Envelope. The South Coast Variant does not enter Rhode Island state waters.

If the South Coast Variant is used for Phase 2, the following scenarios are proposed. While none of these scenarios are currently likely, Scenario 1 is considered the most likely of the three: (1) one export cable installed in the South Coast Variant and two export cables installed in the OECC, (2) two export cables installed in the South Coast Variant and one export cable installed in the OECC, or (3) three export cables installed in the South Coast Variant.[2]

[2] Scenarios 2 and 3 are both very unlikely. Scenarios 2 and 3 would both require significant capacity upgrades to the electrical grid by ISO New England to receive the Phase 2 capacity and are unlikely to be delivered on the

As shown in Figure 1.0-1, the South Coast Variant diverges from the OECC at the northern boundary of Lease Area OCS-A 0501 and travels west-northwest to the state waters boundary near Buzzards Bay. From the Southern Wind Development Area (SWDA)[3] boundary (excluding the two separate aliquots that are closer to shore) through federal waters to the state waters boundary, the South Coast Variant is approximately 79 km (42 NM) in length and approximately 720 m (2,360 ft) in width. To allow additional cable length for turns and micro-siting of the cable within the corridor, the maximum length of each cable within this variation of the OECC (from the SWDA boundary to the Massachusetts state waters boundary) is ~84 km (~45 NM).[4] An additional length of offshore export cable within the SWDA (up to ~34–42 km [~18–23 NM] per cable) will be needed to reach the Phase 2 ESP(s). Thus, the maximum length of each Phase 2 offshore export cable that employs the South Coast Variant is 118–126 km (64–68 NM) between the state waters boundary and the ESP(s). If three Phase 2 offshore export cables use the South Coast Variant, the maximum total length of the Phase 2 offshore export cables within federal waters (assuming three cables) is ~362 km (~196 NM). The maximum total area of seafloor disturbance during construction associated with the use of the South Coast Variant is presented in Table 1.2-1 of the New England Wind COP Addendum.

If used, the South Coast Variant will make landfall along the southwest coast of Massachusetts within the Offshore Routing Envelope.

Operations and Maintenance and decommissioning activities associated with the South Coast Variant are expected to be similar to those discussed in Sections 4.3.2 and 4.3.3 of COP Volume I and Appendix III-S of COP Volume III.

The location of the South Coast Variant was developed based upon careful consideration of multiple technical, environmental, and commercial factors. In particular, the location of the South Coast Variant was chosen in order to consolidate infrastructure with other commercial wind developments (i.e., for much of its length, the South Coast Variant parallels the proposed Mayflower Wind offshore export cable corridor), which helps to minimize environmental impacts. The identified cable corridor was also chosen to avoid impacts to the Vineyard Sound and

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construction timeline contemplated in the COP. These scenarios are only included as potential options in the event that Phase 2 is significantly delayed due to technical, logistical, or other unforeseen issues arise with interconnecting at the West Barnstable substation.

[3] New England Wind will occupy all of Lease Area OCS-A 0534 and potentially a portion of Lease Area OCS-A 0501 in the event that Vineyard Wind 1 does not develop "spare" or extra positions included in Lease Area OCS-A 0501 and Vineyard Wind 1 assigns those positions to Lease Area OCS-A 0534. For the purposes of the COP, the SWDA is defined as all of Lease Area OCS-A 0534 and the southwest portion of Lease Area OCS-A 0501, as shown in Figure 1.0-1.

[4] The offshore export cable length includes a 15% allowance for micro-siting within Lease Areas OCS-A 0534 and OCS-A 0501 and a 5% allowance for micro-siting within the OECC and South Coast Variant outside the lease areas.

Moshup's Bridge Traditional Cultural Property (TCP), which is located just north of the South Coast Variant in Vineyard Sound and encompasses portions of Martha's Vineyard and the Elizabeth Islands.

The Proponent is obtaining survey data and undertaking significant engineering processes to develop specific cable route alignments and to select appropriate installation tools. The entire South Coast Variant is surveyed; however, only a portion of this corridor is needed to install one to three offshore export cables.

3.0 SOUTH COAST VARIANT CONSISTENCY WITH MASSACHUSETTS ENFORCEABLE POLICIES

3.1 Federal Consistency Certification

Section 307(c)(3)(B) of the federal Coastal Zone Management Act (CZMA), as amended, requires any applicant who submits an Outer Continental Shelf (OCS) plan[5] to the Department of the Interior to also provide a certification that each activity described in the OCS plan affecting any land or water use or natural resource of a state's coastal zone complies with the enforceable policies of that state's approved coastal management program and will be carried out in a manner consistent with such program (see 16 U.S.C. § 1456(c)(3)(B)). On July 2, 2020, the Proponent initially submitted an OCS plan— the draft New England Wind COP— to the Department of Interior's Bureau of Ocean Energy Management for approval, with several subsequent updates, including most recently in December 2021. Thus, the portions of New England Wind, both within and outside of the Massachusetts coastal zone, that have reasonably foreseeable effects on the coastal zone's uses and natural resources are subject to federal consistency review by MA CZM under 15 CFR Part 930, Subparts D and E (see Figure 1.0-1).

The South Coast Variant evaluated in this COP Addendum is located within federal waters. The Proponent is currently evaluating options for the South Coast Variant within the "Phase 2 South Coast Variant Offshore Routing Envelope", which is located within Massachusetts state waters and specifically within a region of Buzzards Bay (Figure 1.0-1). The Proponent has voluntarily agreed to having CZM's federal consistency review address the portions of the South Coast Variant in federal waters. As stated previously, if it becomes necessary to employ the South Coast Variant and a second grid interconnection point is secured, the Proponent understands that BOEM would conduct a supplemental review of the South Coast Variant within state waters and the corresponding landfall sites and onshore route(s) to the second grid interconnection point. At that time, the Proponent would provide MA CZM with additional details on the South Coast Variant that demonstrate its compliance with the enforceable policies of the Massachusetts Coastal Program as set forth in the 2011 MA CZM Policy Guide.

[5] *OCS plan* means "any plan for the exploration or development of, or production from, any area which has been leased under the Outer Continental Shelf Lands Act (43 U.S.C. 1331 et seq.), and the regulations under that Act, which is submitted to the Secretary of the Interior or designee following management program approval and which describes in detail federal license or permit activities." The New England Wind Construction and Operations Plan submitted to BOEM is an OCS plan.

3.2 Supplemental Information Related to the Massachusetts Ocean Management Plan

The Massachusetts Ocean Management Plan (OMP) is incorporated into the Massachusetts Coastal Zone Management Plan. Thus, South Coast Variant activities with reasonably foreseeable effects on the Massachusetts coastal zone must also comply with and be conducted in a manner consistent with the OMP.

In consultation with MA CZM, the Proponent is providing supplemental information related to key Special, Sensitive, or Unique (SSU) resources and concentrations of water-dependent uses for community-scale wind facilities such as commercial fishing, recreational fishing, and important bird habitat. A full review of consistency with the OMP will be provided for Phase 2, including the South Coast Variant, as part of a future EFSB petition.

3.2.1 Commercial Fishing

We understand from MA CZM that a principal coastal effect of concern associated with the New England Wind development is to Massachusetts-based commercial fishing interests (a coastal use). Section 2.8 of the New England Wind COP Addendum provides an analysis of the potential impacts from the South Coast Variant to commercial fisheries. Impacts associated with the South Coast Variant are expected to be similar to those of the OECC (including the Western Muskeget Variant) assessed in Section 7.6 and Appendix III-N of COP Volume III. See Section 7.6.4 of COP Volume III for a description of for-hire recreational fishing in the Offshore Development Region and potential impacts that are associated with the OECC and its variants.

Impacts to finfish and invertebrates along the OECC, including those species targeted by commercial fishermen, are expected to be short-term and localized. Only a small portion of available habitat in the area will be impacted by construction activities along the South Coast Variant and recovery is expected.

Commercial fishing vessels will continue to have access to the South Coast Variant. Appendix F of the COP Addendum provides a detailed description of potential economic exposure, potential fishing congestion impacts, and shoreside impacts. Potential impacts from decommissioning activities would be similar to those associated with construction.

Other sections of the New England Wind COP Addendum most relevant to these issues are located in Section 2.5 (Benthic Resources), Section 2.6 (Finfish and Invertebrates), Appendix C (Essential Fish Habitat), and Appendix F (Economic Exposure of Commercial Fisheries).

As summarized in Section 4 and detailed in Section 7.6 and Appendix III-S of COP Volume III, the Proponent is already implementing measures to avoid and minimize impacts to commercial fishing interests and it is anticipated that the South Coast Variant will not have a significant adverse impact on commercial fishing in the Massachusetts coastal zone.

As noted above, vessel restrictions are not generally proposed other than temporary safety buffer zones that are used to improve safety in the immediate vicinity of construction and installation vessels. Accordingly, the majority of the South Coast Variant will remain accessible to commercial fishing vessels throughout the construction and O&M. In short, the Proponent is already implementing multiple measures to avoid and minimize impacts to commercial fisheries. Additionally, the FCP is included as Appendix III-E of COP Volume III.

3.2.2 Recreational Fishing

Section 7.5 (Recreation and Tourism [Including Recreational Fishing]) and Section 7.6 (Commercial Fisheries and For-Hire Recreational Fishing) of COP Volume III provide an analysis of New England Wind's potential impact to recreational fisheries, including for-hire reactional fishing, and measures to mitigate those impacts.

3.2.3 Fisheries and Benthic Studies and Monitoring Plans

As described in Section 2.5, Section 2.6, and Appendix C of the COP Addendum, impacts to finfish and invertebrates along the South Coast Variant from construction, including those species targeted by commercial fishermen, are expected to be short-term and localized. Only a small portion of available habitat in the area will be impacted by South Coast Variant construction activities and recovery is expected. Nevertheless, the Proponent has developed an appropriate benthic habitat monitoring plan framework for the South Coast Variant, should it be necessary, included as Appendix I of the New England Wind COP Addendum. The monitoring data collected during these efforts may also inform expected impacts to and recovery of benthic communities within the South Coast Variant. Fisheries studies, research, and collaborations proposed by the Proponent for New England Wind are outlined in Appendix III-E and Appendix III-S of COP Volume III.

3.2.4 Cable Installation and Monitoring

As described in Section 2, if the South Coast Variant is used for Phase 2, up to three offshore export cables will be installed. Offshore export cable installation is described in detail in Sections 4.3.1.3 of COP Volume I for Phase 2. The following section provides a discussion of key concerns identified by MA CZM in relation to offshore export cable installation activities.

3.2.4.1 Co-Location of New England Wind and Other Proposed Offshore Wind Infrastructure

The location of the South Coast Variant was developed based upon careful consideration of multiple technical, environmental, and commercial factors. In particular, the location of the South Coast Variant was chosen in order to consolidate infrastructure with other commercial wind developments (i.e., for much of its length, the South Coast Variant parallels the proposed Mayflower Wind offshore export cable corridor), which helps to minimize environmental impacts.

3.2.4.2 Offshore Export Cable Installation

Prior to offshore export cable laying, a pre-lay grapnel run, and pre-lay survey will be performed to clear obstructions, such as abandoned fishing gear and other marine debris, and inspect the route. Large boulders along the route may need to be relocated prior to cable installation. Some dredging of the upper portions of sand waves may also be required prior to cable laying to achieve sufficient burial depth below the stable sea bottom (see Section4.3.1.3.5 of COP Volume I). Dredging will be limited only to the extent required to achieve adequate cable burial depth during cable installation. For additional details on offshore export cable installation see Appendix III-S of COP Volume III.

If the South Coast Variant is used for Phase 2, the following scenarios are proposed, where Scenario 1 is considered most likely: (1) one export cable installed in the South Coast Variant and two export cables installed in the OECC, (2) two export cables installed in the South Coast Variant and one export cable installed in the OECC, or (3) three export cables installed in the South Coast Variant.[2] See Table 1.2-1 of the COP Addendum for details on dredging estimates for the South Coast Variant.

In addition to selecting an appropriate tool for the site conditions, the Proponent will work to minimize the likelihood of insufficient cable burial. For example, if the target burial depth (1.5 to 2.5 m [5 to 8 ft]) is not being achieved, operational modifications may be required. Subsequent attempts with a different tool (such as controlled flow excavation) may be required where engineering analysis indicates subsequent attempts may help achieve sufficient burial. As discussed in Section 1.2 of the COP Addendum and Section 4.3.1.3.10 of COP Volume I, while every effort will be made to achieve sufficient burial, it is conservatively estimated that up to approximately 8% of the South Coast Variant (from the SWDA boundary to the state waters boundary) may require cable protection to be installed on the seafloor. Additional details on dredging techniques and offshore export cable installation are provided in Appendix III-S of COP Volume III.

3.2.4.3 Cable Monitoring

The export cables will be regularly monitored to assess depth of burial. Details of cable monitoring are described in detail in Appendix III-S of COP Volume III.

3.2.5 Coastal and Marine Birds

The maximum design scenario for the coastal and marine birds assessment considers temporary construction period impacts from the installation of up to three cables within the South Coast Variant (Section 2.4 of the COP Addendum). The description of the affected environment and impacts associated with the South Coast Variant are expected to be similar to those of the OECC (excluding the Western Muskeget Variant) assessed in Section 6.2 of COP Volume III. Bird exposure to vessels installing offshore export cable(s) will be transitory and ephemeral (see Sections 3.3.1.3 and 4.3.1.3 of COP Volume I for a discussion of offshore cable installation). Any

impacts to foraging habitat from increases in suspended sediments associated with cable installation activities are expected to be temporary and localized and water quality is expected to return to prior conditions within several hours (see COP Addendum Appendix B). As discussed in Section 6.2 and Appendix III-S of COP Volume III, the Proponent will implement measures to avoid, minimize, and mitigate potential impacts to coastal and marine birds.

4.0 CONCLUSION

The Proponent has demonstrated that the proposed action described herein and in the New England Wind COP and COP Addendum complies with the applicable enforceable policies of the approved Massachusetts Coastal Program and will be conducted in a manner consistent with such Program.

New England Wind Phase 2 Offshore Export Cable Corridor South Coast Variant

Rhode Island Coastal Zone Management Act Consistency Certification

Submitted to:
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RHODE ISLAND COASTAL
RESOURCES MANAGEMENT COUNCIL
STEDMAN GOVERNMENT CENTER, SUITE 3
4808 TOWER HILL ROAD
WAKEFIELD, RI 02879-1900

Submitted by:
Park City Wind LLC

Prepared by:
Epsilon Associates Inc

April 2022

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LIST OF FIGURES

1.0 INTRODUCTION

New England Wind is the proposal to develop offshore renewable wind energy facilities in Bureau of Ocean Energy Management (BOEM) Lease Area OCS-A 0534 along with associated offshore and onshore cabling, onshore substations, and onshore operations and maintenance (O&M) facilities. New England Wind will be developed in two Phases: Phase 1 (also known as Park City Wind) and Phase 2 (also known as Commonwealth Wind). Four or five offshore export cables (two for Phase 1 and two or three for Phase 2) will transmit electricity generated by the wind turbine generators (WTGs) to onshore transmission systems (see Figure 1.0-1). Park City Wind LLC, a wholly owned subsidiary of Avangrid Renewables, LLC, is the Proponent and will be responsible for the construction, operation, and decommissioning of New England Wind.

The Proponent has identified an Offshore Export Cable Corridor (OECC) for the installation of the offshore export cables (see Figure 1.0-1). The OECC travels north from Lease Area OCS-A 0534 along the eastern side of Muskeget Channel towards landfall sites in the Town of Barnstable, Massachusetts. The expected grid interconnection point for both Phases of New England Wind is the West Barnstable Substation. While the Proponent intends to install all Phase 2 offshore export cables within this OECC, the Proponent has identified two variations of the OECC that may be employed for Phase 2: the Western Muskeget Variant (which passes along the western side of Muskeget Channel) and the South Coast Variant (which connects to a potential second grid interconnection point) (see Figure 1.0-1). These variations are necessary to provide the Proponent with commercial flexibility should technical, logistical, grid interconnection, or other unforeseen issues arise during the Construction and Operations Plan (COP) review and engineering processes.

The Proponent has submitted a draft New England Wind COP that describes the OECC and both potential Phase 2 OECC variants, with accompanying data and analysis for the OECC and the Western Muskeget Variant. The purpose of this COP Addendum is to provide relevant data and analysis supporting the South Coast Variant in federal waters for New England Wind. This COP Addendum incorporates by reference the analyses in the COP (including the appendices) and is focused on describing impacts that are unique to the South Coast Variant. Accordingly, descriptions of impacts that are associated with the OECC or its variants more generally and that are not specific to the South Coast Variant are not repeated in this COP Consistency Certification.

The Proponent has prepared this Consistency Certification to demonstrate that the South Coast Variant, if used, will comply with, and will be conducted in a manner consistent with, the enforceable policies of the Rhode Island Coastal Resources Management Program (RICRMP). The South Coast Variant is located entirely within federal waters and Massachusetts state waters. The South Coast Variant is also within Rhode Island's 2011 and the northern edge of the 2018 Geographic Location Description (GLD) (see Figure 1.0-1).

Thus, the Proponent certifies to the Rhode Island Coastal Resources Management Council (CRMC) that:

> *The proposed activities described in detail in the New England Wind COP Addendum comply with Rhode Island's approved Coastal Resource Management Program and will be conducted in a manner consistent with such Program*.

This certification is made in accordance with the requirements of the Coastal Zone Management Act (16 U.S.C. 1451 et seq.) and implementing regulations at 15 CFR Part 930, Subpart E.

A summary of the South Coast Variant is provided in Section 2. Section 3 demonstrates how the South Coast Variant, as described in Section 2 and more completely in the New England Wind COP and COP Addendum, complies with each of the RICRMP's applicable enforceable policies.

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Data Source: Bureau of Geographic Information (MassGIS), Commonwealth of Massachusetts, Executive Office of Technology and Security Services

DIGHTON
BERKLEY
REHOBOTH
LAKEVILLE
MIDDLEBOROUGH
CARVER
PLYMOUTH
SEEKONK
WAREHAM
Massachusetts
SWANSEA
FREETOWN
ROCHESTER
Covell's Beach
Landfall Site (Phase 1)
SOMERSET
FALL RIVER
ACUSHNET
MARION
SANDWICH
BREWSTER
Craigville Public Beach
Landfall Site (Phase 1)
DENNIS
DARTMOUTH
BOURNE
BARNSTABLE
HARWICH
YARMOUTH
MATTAPOISETT
Dowses Beach
Landfall Site (Phase 2)
FAIRHAVEN
WESTPORT
FALMOUTH
MASHPEE
Rhode
Island
NEW
BEDFORD
Wianno Ave
Landfall Site (Phase 2)
GOSNOLD
TISBURY
OAK BLUFFS
WEST
TISBURY
EDGARTOWN
CHILMARK
AQUINNAH
NANTUCKET
Vineyard Wind 1
(OCS-A 0501)
New England Wind
(OCS-A 0534)
Federal
Waters

LEGEND

- Phase 2 South Coast Variant Offshore Routing Envelope
- Phase 2 South Coast Variant Onshore Routing Envelope
- New England Wind Offshore Export Cable Corridor (OECC)
- Phase 2 OECC South Coast Variant
- Phase 2 OECC Western Muskeget Variant
- Maximum Size of Southern Wind Development Area (SWDA)
- Lease Area Boundary
- 2011 Geographic Location Description (GLD)
- 2018 GLD
- Town Boundary
- State/Federal Boundary
- Offshore Town Boundary

Scale 1:400,000
1 inch = 10,160 meters
0 5,080 10,160
Meters

Map Coordinate System: NAD 1983 UTM Zone 19N
Basemap: 2018 World Ocean Base, Esri

Figure 1.0-1

Location of New England Wind's Offshore Facilities Within the 2011 and 2018 GLD

2.0 SUMMARY OF THE NEW ENGLAND WIND PHASE 2 OECC SOUTH COAST VARIANT

2.1 Overview

The South Coast Variant is included in the COP to provide the Proponent with the commercial flexibility required should technical, logistical, grid interconnection, or other unforeseen issues arise during the COP review and detailed engineering that preclude one or more Phase 2 export cables from interconnecting at the West Barnstable Substation. If it becomes necessary to employ the South Coast Variant and a second grid interconnection point is secured, the Proponent understands that BOEM would conduct supplemental review of the South Coast Variant within state waters and the corresponding onshore route(s) to the second grid interconnection point.

The South Coast Variant would only be employed if one or more Phase 2 offshore export cables need to interconnect at a second grid interconnection point. Unexpected scenarios that could potentially necessitate the use of the South Coast Variant include, but are not limited to:

- further detailed engineering identifies technical issues with landing one or more Phase 2 offshore export cables at potential landfall sites in Barnstable;
- additional detailed engineering identifies technical issues with installing one or more Phase 2 cables within roadway layouts and utility rights-of-way (ROWs) to reach the West Barnstable Substation; and/or
- grid interconnection issues at the West Barnstable Substation arise that are beyond the Proponent's control.

As shown in Figure 1.0-1, the South Coast Variant diverges from the OECC at the northern boundary of Lease Area OCS-A 0501 and travels west-northwest through federal waters to the Massachusetts state waters boundary near Buzzards Bay. At the Massachusetts state waters boundary, the South Coast Variant broadens to a "Phase 2 South Coast Variant Offshore Routing Envelope" that indicates a region within Buzzards Bay where the Phase 2 offshore export cable(s) may be installed before making landfall along the southwest coast of Massachusetts within the Offshore Routing Envelope. The South Coast Variant does not enter Rhode Island state waters.

If the South Coast Variant is used for Phase 2, the following scenarios are proposed. While none of these scenarios are currently likely, Scenario 1 is considered the most likely of the three: (1) one export cable installed in the South Coast Variant and two export cables installed in the OECC, (2) two export cables installed in the South Coast Variant and one export cable installed in the OECC, or (3) three export cables installed in the South Coast Variant.[1]

[1] Scenarios 2 and 3 are both very unlikely. Scenarios 2 and 3 would both require significant capacity upgrades to the electrical grid by ISO New England to receive the Phase 2 capacity and are unlikely to be delivered on the

As shown in Figure 1.0-1, the South Coast Variant diverges from the OECC at the northern boundary of Lease Area OCS-A 0501 and travels west-northwest to the state waters boundary near Buzzards Bay. From the Southern Wind Development Area (SWDA)[2] boundary (excluding the two separate aliquots that are closer to shore) through federal waters to the state waters boundary, the South Coast Variant is approximately 79 km (42 NM) in length and approximately 720 m (2,360 ft) in width. To allow additional cable length for turns and micro-siting of the cable within the corridor, the maximum length of each cable within this variation of the OECC (from the SWDA boundary to the Massachusetts state waters boundary) is ~84 km (~45 NM).[3] An additional length of offshore export cable within the SWDA (up to ~34–42 km [~18–23 NM] per cable) will be needed to reach the Phase 2 ESP(s). Thus, the maximum length of each Phase 2 offshore export cable that employs the South Coast Variant is 118–126 km (64–68 NM) between the state waters boundary and the ESP(s). If three Phase 2 offshore export cables use the South Coast Variant, the maximum total length of the Phase 2 offshore export cables within federal waters (assuming three cables) is ~362 km (~196 NM). The maximum total area of seafloor disturbance during construction associated with the use of the South Coast Variant is presented in Table 1.2-1 of the New England Wind COP Addendum.

If used, the South Coast Variant will make landfall along the southwest coast of Massachusetts within the Phase 2 South Coast Variant Offshore Routing Envelope.

Operations and Maintenance and decommissioning activities associated with the South Coast Variant are expected to be similar to those discussed in Sections 4.3.2 and 4.3.3 of COP Volume I and Appendix III-S of COP Volume III.

The location of the South Coast Variant was developed based upon careful consideration of multiple technical, environmental, and commercial factors. In particular, the location of the South Coast Variant was chosen in order to consolidate infrastructure with other commercial wind developments (i.e., for much of its length, the South Coast Variant parallels the proposed Mayflower Wind offshore export cable corridor), which helps to minimize environmental impacts. The identified cable corridor was also chosen to avoid impacts to the Vineyard Sound and

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construction timeline contemplated in the COP. These scenarios are only included as potential options in the event that Phase 2 is significantly delayed due to technical, logistical, or other unforeseen issues arise with interconnecting at the West Barnstable substation.

[2] New England Wind will occupy all of Lease Area OCS-A 0534 and potentially a portion of Lease Area OCS-A 0501 in the event that Vineyard Wind 1 does not develop "spare" or extra positions included in Lease Area OCS-A 0501 and Vineyard Wind 1 assigns those positions to Lease Area OCS-A 0534. For the purposes of the COP, the SWDA is defined as all of Lease Area OCS-A 0534 and the southwest portion of Lease Area OCS-A 0501, as shown in Figure 1.0-1.

[3] The offshore export cable length includes a 15% allowance for micro-siting within Lease Areas OCS-A 0534 and OCS-A 0501 and a 5% allowance for micro-siting within the OECC and South Coast Variant outside the lease areas.

Moshup's Bridge Traditional Cultural Property (TCP), which is located just north of the South Coast Variant in Vineyard Sound and encompasses portions of Martha's Vineyard and the Elizabeth Islands.

The Proponent is obtaining survey data and undertaking significant engineering processes to develop specific cable route alignments and to select appropriate installation tools. The entire South Coast Variant is surveyed; however, only a portion of this corridor is needed to install one to three offshore export cables.

3.0 NEW ENGLAND WIND CONSISTENCY WITH RHODE ISLAND ENFORCEABLE POLICIES

3.1 Jurisdiction for Federal Consistency Certification

Section 307(c)(3)(B) of the Coastal Zone Management Act (CZMA), as amended, requires any applicant who submits an Outer Continental Shelf (OCS) plan[4] to the Department of the Interior to also provide a certification that each activity described in the OCS plan affecting any land or water use or natural resource of a state's coastal zone complies with the enforceable policies of that state's approved coastal management program and will be carried out in a manner consistent with such program (see 16 U.S.C. § 1456(c)(3)(B)). On July 2, 2020, the Proponent initially submitted an OCS plan— the draft New England Wind COP— to the Department of Interior's Bureau of Ocean Energy Management (BOEM) for approval. The COP was last updated on December 17, 2021, and identified two variations of the Phase 2 OECC, including the Phase 2 OECC Western Muskeget Variant and the Phase 2 OECC South Coast Variant. The Phase 2 OECC South Coast Variant, as described in the New England Wind COP Addendum, is located within CRMC's 2011 and 2018 GLD and; therefore, is subject to federal consistency review by CRMC under 15 CFR Part 930, Subpart E (see Figure 1.0-1).

The following sections demonstrate compliance with the applicable enforceable policies of the RICRMP contained in Chapter 11 of CRMC's Ocean Special Area Management Plan (Ocean SAMP) (650-RICR-20-05-11.10). The sections below provide relevant data and analysis supporting the South Coast Variant in federal waters for New England Wind and incorporate by reference detailed information in the New England Wind COP, Appendix III-S of COP Volume III, and the New England Wind COP Addendum. Accordingly, descriptions of impacts that are associated with the OECC or its variants more generally and that are not specific to the South Coast Variant are not repeated in this appendix.

3.2 Overall Regulatory Standards (§ 11.10.1)

§ 11.10.1(A)

All offshore developments regardless of size, including energy projects, which are proposed for or located within state waters of the Ocean SAMP area, are subject to the policies and standards outlined in §§ 11.9 and 11.10 of this Part. The Council shall not use § 11.9 of this Part for CRMC concurrences or objections for CZMA federal consistency reviews.

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[4] *OCS plan* means "any plan for the exploration or development of, or production from, any area which has been leased under the Outer Continental Shelf Lands Act (43 U.S.C. 1331 et seq.), and the regulations under that Act, which is submitted to the Secretary of the Interior or designee following management program approval and which describes in detail federal license or permit activities." The New England Wind Construction and Operations Plan submitted to BOEM is an OCS plan.

As described in Section 3.1, the South Coast Variant is subject to CZMA federal consistency review by CRMC; therefore, the enforceable policies of the RICRMP contained in Chapter 11 of CRMC's Ocean SAMP (650-RICR-20-05-11.10) are reviewed. New England Wind, including the South Coast Variant, meets the definition of a "large-scale offshore development" pursuant to RICR-20-05-11.3(H)(1) and RICR-20-05-11.10.1(A)(1).

§ 11.10.1(B)

In assessing the natural resources and existing human uses present in state waters of the Ocean SAMP area, the Council finds that the most suitable area for offshore renewable energy development in the state waters of the Ocean SAMP area is the renewable energy zone depicted in Figure 1 in § 11.10.1(O) of this Part, below. The Council designates this area as Type 4E waters. In the Rhode Island Coastal Resources Management Program (Subchapter 00 Part 1 of this Chapter) these waters were previously designated as Type 4 (multipurpose) but are hereby modified to show that this is the preferred site for large scale renewable energy projects in state waters. The Council may approve offshore renewable energy development elsewhere in the Ocean SAMP area, within state waters, where it is determined to have no significant adverse impact on the natural resources or human uses of the Ocean SAMP area. Large-scale offshore developments shall avoid areas designated as Areas of Particular Concern consistent with § 11.10.2 of this Part. No large-scale offshore renewable energy development shall be allowed in Areas Designated for Preservation consistent with § 11.10.3 of this Part.

As mentioned in Section 2.1, the location of the South Coast Variant was developed based upon careful consideration of multiple technical, environmental, and commercial factors. The South Coast Variant evaluated in this COP Addendum is located in federal waters (with a Phase 2 South Coast Variant Offshore Routing Envelope identified in Massachusetts state waters) and thus is not located in Rhode Island state waters identified within the Ocean SAMP area; however, the South Coast Variant crosses through CRMC's 2011 GLD and along the northern edge of the 2018 GLD within federal waters to make landfall at a location within the Phase 2 South Coast Variant Offshore Routing Envelope.

No significant adverse impact on the natural resources or human uses of the Ocean SAMP area is expected through the pre-construction, construction, operation, or decommissioning phases of the South Coast Variant. See Sections 3.3 and 3.4 for further discussion of Areas of Particular Concern (APC) and Areas Designated for Preservation.

The South Coast Variant crosses through a small portion of the northern edge of glacial moraines identified within the Ocean SAMP as APC. Although a wider corridor is shown for the potential offshore export cable(s), seafloor disturbance from cable installation only results in a 1 m (3.3 ft) wide cable installation trench and a 3 m (10 ft) wide temporary disturbance zone from the tracks or skids (see Section 4.3.1.3.6 of COP Volume I). The temporary impacts associated with the unlikely maximum scenario of three cables installed within the South Coast Variant only results in impacts to approximately 0.002% of the total mapped end moraine area within the APC.

Additionally, the offshore export cable length includes a 5% allowance for micro-siting within the South Coast Variant for avoidance to sensitive habitat areas, or other environmental or technical reasons.

§ 11.10.1(C)

Offshore developments shall not have a significant adverse impact on the natural resources or existing human uses of the Rhode Island coastal zone, as described in the Ocean SAMP. In making the evaluation of the effect on human uses, the Council will determine, for example, if there is an overall net benefit to the Rhode Island marine economic sector from the development of the project or if there is an overall net loss. Where the Council determines that impacts on the natural resources or human uses of the Rhode Island coastal zone through the pre-construction, construction, operation, or decommissioning phases of a project constitute significant adverse effects not previously evaluated, the Council shall, through its permitting and enforcement authorities in state waters and through any subsequent CZMA federal consistency reviews, require that the applicant modify the proposal to avoid and/or mitigate the impacts or the Council shall deny the proposal.

We understand from CRMC that the principal coastal effects of concern associated with the South Coast Variant within the 2011 GLD and 2018 GLD is to glacial moraines. The sections of the New England Wind COP Addendum most relevant to this issue are included in Section 2.5, Section 2.6, Appendix A, Appendix C, and Appendix I.

As summarized in Section 4 of COP Volume III, the Proponent is already implementing measures to avoid and minimize impacts associated with New England Wind, particularly to commercial fishing interests. Appendix F of the New England Wind COP Addendum contains an analysis of the value of commercial fishing harvest from the South Coast Variant based on the most recent available data. Accordingly, it is anticipated that the South Coast Variant will not have a significant adverse impact on the natural resources or existing human uses of the Rhode Island coastal zone.

Cable Protection

The installation of submarine cables along the South Coast Variant will be planned and implemented in a manner to avoid or minimize impacts to commercial fishing activities. The offshore export cables will have a target burial depth of 1.5 to 2.5 m (5 to 8 ft) below the seafloor, which the Proponent's engineers have determined is more than twice the burial depth required to protect the cables and prevent them from interfering with commercial fishing operations. While the Proponent will make every effort to achieve that target burial depth, it is conservatively estimated that bottom conditions may prevent achieving proper cable burial depth along up to approximately 8% of the South Coast Variant (from the SWDA boundary to the state waters boundary), which may require cable protection to be installed on the seafloor. For additional information on cable protection, including avoidance and minimization measures, see Appendix III-S of COP Volume III.

Access to the South Coast Variant

Construction and installation activities will occur within very limited and well-defined areas of the South Coast Variant. During construction, fishing vessels will not be precluded from operating in or transiting through the South Coast Variant other than where temporary safety buffer zones may be established in the immediate vicinity around construction and installation vessels. Accordingly, the majority of the South Coast Variant will remain accessible to commercial fishing vessels throughout the construction of New England Wind.

During O&M, the South Coast Variant will be open to marine traffic, and no permanent vessel restrictions are proposed. If in-water maintenance activities are required, there could be temporary safety buffer zones established around work areas in limited areas of the South Coast Variant.

Economic Exposure and Impacts to Rhode Island Commercial Fisheries

As summarized in Section 4 of COP Volume III, the Proponent is implementing several key measures to minimize impacts to commercial fisheries (e.g., establishing a gear loss/damage protocol). An overview of potential impacts to commercial fisheries from construction and installation, operations and maintenance, and decommissioning of the OECC and its variants, including the South Coast Variant is provide in Section 7.6.3 of COP Volume III.

The economic exposure and potential economic impacts to commercial fisheries, including Rhode Island-based commercial fisheries, are analyzed in detail in Appendix F of the New England Wind COP Addendum. This analysis considers the potential direct impacts to commercial fisheries, as well as potential indirect sources of economic impacts on commercial fishing and on fishery-dependent shoreside businesses. The analysis is based on four main sources of fishing revenue data that are available to estimate expected fishing revenues in the South Coast Variant, which indicate that the South Coast Variant does not include high-value commercial fishing grounds (Appendix F of COP Addendum).

Overall, commercial fishing activity in the South Coast Variant is low to modest. Fishing trips that transect the South Coast Variant spend most of their time and generate most of their revenues in nearby fishing areas outside the South Coast Variant.

Fisheries Studies

The Proponent is committed to fisheries science and research as it relates to offshore wind energy development. Fisheries studies, research, and collaborations proposed by the Proponent for New England Wind are outlined in Appendix III-E and Appendix III-S of COP Volume III.

In addition, the Proponent has developed a benthic habitat monitoring plan framework for the South Coast Variant, should it be necessary, included as Appendix I of the New England Wind COP Addendum. The monitoring data collected during these efforts may also inform expected impacts to and recovery of benthic communities within the South Coast Variant.

Avoidance, Minimization, and Mitigation Measures

Avoidance, minimization, and mitigation measures are summarized in Section 4 and Appendix III-S of COP Volume III. Additionally, the Fisheries Communication Plan (FCP) is included as Appendix III-E of COP Volume III.

As noted above, vessel restrictions are not generally proposed other than temporary safety buffer zones that are used to improve safety in the immediate vicinity of construction and installation vessels. Accordingly, the majority of the South Coast Variant will remain accessible to commercial fishing vessels throughout the construction and O&M.

§ 11.10.1(D)

Any large-scale offshore development, as defined in § 11.3(H) of this Part, shall require a meeting between the Fisherman's Advisory Board (FAB), the applicant, and the Council staff to discuss potential fishery-related impacts, such as, but not limited to, project location, wind turbine configuration and spacing, construction schedules, alternative locations, project minimization and identification of high fishing activity or habitat edges. For any state permit process for a large-scale offshore development this meeting shall occur prior to submission of the state permit application. The Council cannot require a pre-application meeting for federal permit applications, but the Council strongly encourages applicants for any large-scale offshore development, as defined in § 11.3(H) of this Part, in federal waters to meet with the FAB and the Council staff prior to the submission of a federal application, lease, license, or authorization. These pre-application meetings, however, do not constitute a formal meeting to satisfy the necessary data and information required for federal consistency reviews, unless mutually agreed to between the CRMC and the applicant. However, for federal permit applicants, a meeting with the FAB as described within this section shall be necessary data and information required for federal consistency reviews for purposes of starting the CZMA 6-month review period for federal license or permit activities under 15 C.F.R. Part 930, Subpart D, and OCS Plans under 15 C.F.R. Part 930, Subpart E, pursuant to 15 C.F.R. § 930.58(a)(2).

The Proponent met with CRMC staff on July 13, 2020 to provide an introductory overview of New England Wind. The Proponent will meet with the Fisherman's Advisory Board (FAB) and CRMC staff in accordance with § 11.10.1(D) to satisfy the necessary data and information requirement on a date and time provided by CRMC.

§ 11.10.1(E)

The Council shall prohibit any other uses or activities that would result in significant long-term negative impacts to Rhode Island's commercial or recreational fisheries. Long-term impacts are defined as those that affect more than one or two seasons.

The South Coast Variant will not result in significant long-term negative impacts to Rhode Island's commercial or recreational fisheries. Please see the discussion under § 11.10.1(C) above in addition to Section 2.8 and Appendix F of the New England Wind COP Addendum and Sections 7.5 and 7.6 of COP Volume III.

As summarized under § 11.10.1(F) below and described in more detail in Section 2.5, 2.6, and Appendix C in the New England Wind COP Addendum, the South Coast Variant is not expected to result in significant long-term adverse impacts to benthic, finfish, and invertebrate species of commercial and recreational importance. Overall, localized impacts from the alteration of habitat in the South Coast Variant are expected to be minimal and recovery of natural assemblages is expected.

§ 11.10.1(F)

The Council shall require that the potential adverse impacts of offshore developments and other uses on commercial or recreational fisheries be evaluated, considered and mitigated as described in § 11.10.1(G) of this Part.

The Proponent has fully analyzed the potential impacts of the South Coast Variant on commercial and recreational fisheries and has considered, avoided, minimized, and mitigated those potential impacts. The resource areas related to commercial and recreational fisheries are discussed below.

Potential Impacts to Benthic Resources and Mitigation Measures

Potential Impacts

Section 2.5, 2.6, and Appendix C of the New England Wind COP Addendum, in combination with Section 6.5 of COP Volume III provide an analysis of the South Coast Variant's potential impacts to benthic habitat, including commercially important species, as well as measures to mitigate those impacts. Impact producing factors considered include habitat alteration (including impacts from anchoring, jacking-up, and cable protection), suspended sediments, sediment deposition, water withdrawals, electromagnetic fields (EMF), cable installation/maintenance, and underwater noise.

As described in Section 4.3.1.3 of COP Volume I and the New England Wind COP Addendum, activities within the South Coast Variant OECC are expected to include cable installation, anchoring, the potential dredging of the tops of sand waves in certain locations, the potential use of cable protection (if required), and the limited use of jack-up vessels for cable splicing. The amount of habitat disturbance from cable installation, anchoring, the potential dredging of the tops of sand waves in certain locations, and the limited use of jack-up vessels for cable splicing is outlined in Table 1.2-1 of the New England Wind COP Addendum.

Overall, construction period impacts from the alteration of habitat in the South Coast Variant are expected to be minimal and recovery of natural assemblages is expected. Permanent habitat alteration may occur in a small area of the South Coast Variant (see Table 1.2-1) from the potential

installation of cable protection (if required), which alters habitat through the addition of hard substrate. The Proponent is working to minimize the amount of cable protection needed. Should cable protection be required, it will be designed to minimize impacts to fishing gear to the extent feasible, and fishermen will be informed of the areas where protection is used.

Avoidance, Minimization, and Mitigation Measures

Section 2.5 of the New England Wind COP Addendum includes several mitigation measures that will be employed to avoid and minimize potential impacts to benthic resources within the South Coast Variant. Offshore export cable installation will avoid important habitats such as eelgrass beds and hard bottom sediments where feasible, although it is recognized that it may not be possible to avoid all hard bottom sediments where they are widespread. Where feasible and considered safe, mid-line buoys on anchor lines will be used to minimize impacts from anchor line sweep. The Proponent is also committed to developing an appropriate benthic habitat monitoring plan framework for New England Wind that includes the South Coast Variant, should it be necessary, in consultation with BOEM and other agencies as appropriate (see Appendix I of the New England Wind COP Addendum). Section 4.0 of COP Volume III includes a summary of potential benefits, impacts, and mitigation measures.

Potential Impacts to Finfish and Invertebrates and Mitigation Measures

Potential Impacts

A list of the major fish and invertebrates that may be found in the New England Wind offshore development area is provided in Table 6.6-1 of COP Volume III. The same species are assumed to be found along the South Coast Variant with the addition of 22 species identified within 5 miles of the South Coast Variant (see Table 2.6-1 of the New England Wind COP Addendum).

Section 2.6 of the New England Wind COP Addendum addresses the potential unique impacts of the South Coast Variant development on finfish and invertebrates, which include habitat alteration, suspended sediments, sediment deposition, and water withdrawals. Descriptions of impacts that are associated with the OECC or its Variants more generally and that are not specific to the South Coast Variant, including increased sound exposure, electromagnetic fields, cable maintenance, additional O&M impacts, and decommissioning, are included in Section 6.6 of COP Volume III. In brief, habitat disturbance is expected to temporary and short-term, suspended sediments due to cable installation will settle out in two to three hours, and sediment deposition impacts will be limited (deposition of 1 mm (0.04 in) or greater (i.e., the threshold of concern for demersal eggs) was constrained to within 200 m (656 ft) from the route centerline).

Avoidance, Minimization, and Mitigation Measures

Avoidance, minimization, and mitigation measures are discussed in Section 2.6 of the New England Wind COP Addendum. Additionally, Section 4.0 of COP Volume III includes a summary of potential benefits, impacts, and mitigation measures.

Potential Impacts to Recreational Fishing and Mitigation Measures

Potential Impacts

Section 7.5 and Section 7.6 and Appendix III-S of COP Volume III provide a thorough analysis of New England Wind's potential impact to recreational fisheries, including for-hire reactional fishing, and measures to mitigate those impacts.

Avoidance, Minimization, and Mitigation Measures

As discussed under § 11.10.1(C), Section 7.5, Section 7.6, Appendix III-E and Appendix III-S of COP Volume III, the Proponent will implement measures to avoid, minimize, and mitigate potential impacts to recreational fisheries. Additionally, Section 4.0 of COP Volume III includes a summary of potential benefits, impacts, and mitigation measures.

Potential Impacts to Commercial Fishing and Mitigation Measures

Potential Impacts

Section 2.8 of the New England Wind COP Addendum provides an analysis of the potential impacts from the South Coast Variant to commercial fisheries. Impacts associated with the South Coast Variant are expected to be similar to those of the OECC (including the Western Muskeget Variant) assessed in Section 7.6 and Appendix III-N of COP Volume III. See Section 7.6.4 of COP Volume III for a description of for-hire recreational fishing in the Offshore Development Region and potential impacts that are associated with the OECC and its variants.

Impacts to finfish and invertebrates along the OECC, including those species targeted by commercial fishermen, are expected to be short-term and localized. Only a small portion of available habitat in the area will be impacted by construction activities along the South Coast Variant and recovery is expected.

Commercial fishing vessels will continue to have access to the South Coast Variant throughout operations. Appendix F of the COP Addendum provides a detailed description of potential economic exposure, potential fishing congestion impacts, and shoreside impacts. Potential impacts from decommissioning activities would be similar to those associated with construction.

Avoidance, Minimization, and Mitigation Measures

The measures that the Proponent will implement to avoid, minimize, and mitigate potential impacts to commercial fisheries are described under § 11.10.1(C). Section 4.0 of COP Volume III includes a summary of potential benefits, impacts, and mitigation measures.

§ 11.10.1(G)

For the purposes of fisheries policies and standards as summarized in Ocean SAMP Chapter 5, Commercial and Recreational Fisheries, §§ 5.3.1 and 5.3.2 of this Subchapter, mitigation is defined as a process to make whole those fisheries user groups, including related shore-side seafood processing facilities, that are adversely affected by offshore development proposals or projects. Mitigation measures shall be consistent with the purposes of duly adopted fisheries management plans, programs, strategies and regulations of the agencies and regulatory bodies with jurisdiction over commercial and recreational fisheries, including but not limited to those set forth above in § 11.9.4(B) of this Part. Mitigation shall not be designed or implemented in a manner that substantially diminishes the effectiveness of duly adopted fisheries management programs. Mitigation measures may include, but are not limited to, compensation, effort reduction, habitat preservation, restoration and construction, marketing, and infrastructure and commercial fishing fleet improvements. Where there are potential impacts associated with proposed projects, the need for mitigation shall be presumed (see § 11.10.1(F) of this Part). Mitigation shall be negotiated between the Council staff, the FAB, the project developer, and approved by the Council. The final mitigation will be the mitigation required by the CRMC and included in the CRMC's Assent for the project or included within the CRMC's federal consistency decision for a project's federal permit application.

Measures to mitigate impacts to benthic resources and fish species are summarized under § 11.10.1(F) above and described in detail in Sections 6.5.2 and 6.6.2 of COP Volume III and Sections 2.5, 2.6, and Appendix C of the New England Wind COP Addendum.

Measures to mitigate impacts to commercial and recreational fisheries are described in Sections 7.5.2, 7.6.3, and 7.6.4 of COP Volume III, and summarized under § 11.10.1(C) and § 11.10.1(F) above. The Proponent has developed an assessment of the economic exposure of commercial fisheries to the South Coast Variant (see Appendix F of the New England Wind COP Addendum).

§ 11.10.1(H)

The Council recognizes that moraine edges, as illustrated in Figures 3 and 4 in § 11.10.2 of this Part, are important to commercial and recreational fishermen. In addition to these mapped areas, the FAB may identify other edge areas that are important to fisheries within a proposed project location. The Council shall consider the potential adverse impacts of future activities or projects on these areas to Rhode Island's commercial and recreational fisheries. Where it is determined that there is a significant adverse impact, the Council will modify or deny activities that would impact these areas. In addition, the Council will require assent holders for offshore developments to employ micro-siting techniques in order to minimize the potential impacts of such projects on these edge areas.

A marine site investigation was conducted for the South Coast Variant. Appendix A of the New England Wind COP Addendum provides the geophysical, geotechnical, and biological data collected for the South Coast Variant.

As described in § 11.10.1(B), the installation of offshore export cables within the South Coast Variant are not expected to have a significant adverse impact to the moraines. Although a wider corridor is shown for the potential offshore export cable(s), seafloor disturbance from cable installation only results in a 1 m (3.3 ft) wide cable installation trench and a 3 m (10 ft) wide temporary disturbance zone from the tracks or skids (see COP Volume I Section 4.3.1.3.6). The temporary impacts associated with the unlikely maximum scenario of three cables only results in impacts to approximately 0.002 % of the total mapped end moraine area within the RI SAMP. Additionally, the offshore export cable length includes a 5% allowance for micro-siting within the South Coast Variant for avoidance to sensitive habitat areas, or other environmental or technical reasons.

The location of the South Coast Variant was developed based upon careful consideration of multiple technical, environmental, and commercial factors. Measures to mitigate impacts to benthic resources and fish species are summarized under § 11.10.1(F) above and described in detail in Sections 6.5.2 and 6.6.2 of COP Volume III, Sections 2.5 and 2.6 and Appendix C of the New England Wind COP Addendum.

Measures to mitigate impacts to commercial and recreational fisheries are described in Sections 7.5.2, 7.6.3, and 7.6.4 of COP Volume III, and summarized under § 11.10.1(C) and § 11.10.1(F) above. The Proponent has developed an assessment of the economic exposure of commercial fisheries to the South Coast Variant (see Appendix F of the New England Wind COP Addendum).

§ 11.10.1(I)

The finfish, shellfish, and crustacean species that are targeted by commercial and recreational fishermen rely on appropriate habitat at all stages of their life cycles. While all fish habitat is important, spawning and nursery areas are especially important in providing shelter for these species during the most vulnerable stages of their life cycles. The Council shall protect sensitive habitat areas where they have been identified through the Site Assessment Plan or Construction and Operation Plan review processes for offshore developments as described in § 11.10.5(C) of this Part.

Section 2.5 of the New England Wind COP Addendum contains a description of benthic habitats within the South Coast Variant. Section 2.6 of the New England Wind COP Addendum contains a discussion of fish and invertebrate species within the South Coast Variant. Essential Fish Habitat is discussed in Appendix C of the New England Wind COP Addendum. These sections specifically address the life histories of fish found in the South Coast Variant, including species targeted by commercial and recreational fishermen, and their habitats.

As described in Appendix III-C of the New England Wind COP Addendum, Soft Bottom habitats are the most common along the South Coast Variant and make up approximately 84% of the entire corridor. These areas typically contain a sandy surficial layer that is either highly mobile and comprised of migrating bedforms or flat and stable, mostly void of active sediment transport features.

Complex Habitat, defined as hard bottom substrates, hard bottom with epifauna or macroalgae cover, and vegetated habitats, was identified along approximately 7% of the South Coast Variant, primarily in one patch in the middle of the South Coast Variant near Southwest Shoal located southwest of Nomans Island (see Figure 2.0-2 in Appendix C of the New England Wind COP Addendum).

Impacts to finfish, shellfish, and crustacean species (as described in Sections 6.5 and 6.6 of COP Volume III and Section 2.6 and 2.6 of the New England Wind COP Addendum) are summarized above under § 11.10.1(F). Most potential impacts to finfish, shellfish, and crustacean species are expected to be temporary. Permanent habitat alteration may occur from the potential installation of cable protection (if required), which alters habitat through the addition of hard substrate.

§ 11.10.1(J)

Any large-scale offshore development, as defined in this Part, shall require a meeting between the HAB, the applicant, and the Council staff to discuss potential marine resource and habitat-related issues such as, but not limited to, impacts to marine resource and habitats during construction and operation, project location, construction schedules, alternative locations, project minimization, measures to mitigate the potential impacts of proposed projects on habitats and marine resources, and the identification of important marine resource and habitat areas. For any state permit process for a large-scale offshore development, this meeting shall occur prior to submission of the state permit application. The Council cannot require a pre-application meeting for federal permit applications, but the Council strongly encourages applicants for any large-scale offshore development, as defined in this Part, in federal waters to meet with the HAB and the Council staff prior to the submission of a federal application, lease, license, or authorization. However, for federal permit applicants, a meeting with the HAB shall be necessary data and information required for federal consistency reviews for purposes of starting the CZMA six-month review period for federal license or permit activities under 15 C.F.R. Part 930, Subpart D, and OCS Plans under 15 C.F.R. Part 930, Subpart E, pursuant to 15 C.F.R. § 930.58(a)(2).

As noted under § 11.10.1(D), the Proponent met with CRMC staff on July 13, 2020 to provide an introductory overview of the New England Wind project. The Proponent will meet with the Habitat Advisory Board (HAB) and the CRMC staff to discuss potential marine resource and habitat-related issues associated with New England Wind, including ongoing and planned fisheries studies, on a date and time provided by CRMC.

The New England Wind COP and COP Addendum include detailed information on project location, construction schedules, alternative locations, the identification of important marine resource and habitat areas, the potential impacts to marine resource and habitats during construction and operation, and project mitigation measures for unavoidable potential impacts on habitats and marine resources. See Sections 3.1.1.3, 3.3.1.1, 4.1.1.3, and 4.3.1.1 (construction schedule) of COP Volume I and Section 6.7 and Section 6.8 of COP Volume III. See also Section 2.5, Section 2.6, and Appendix C of the New England Wind COP Addendum and.

§ 11.10.1(K)

The potential impacts of a proposed project on cultural and historic resources will be evaluated in accordance with the National Historic Preservation Act and Antiquities Act, and the Rhode Island Historical Preservation Act and Antiquities Act as applicable. Depending on the project and the lead federal agency, the projects that may impact marine historical or archaeological resources identified through the joint agency review process may require a marine archaeology assessment that documents actual or potential impacts the completed project will have on submerged cultural and historic resources.

A marine archaeological resources assessment (MARA) was conducted for the South Coast Variant and is included as Appendix E. Gradiometer, side-scan sonar, bathymetry, seismic, sub-bottom profiler, and vibracore data were reviewed to assess the presence or absence of potential submerged cultural resources within the preliminary area of potential effects (PAPE).

Potential mitigation measures for unavoidable impacts are provided in Appendix O of the MARA for the OECC included in Volume II-D of the COP. Avoidance, minimization, and mitigation measures for submarine historical and archaeological resources are determined in consultation with BOEM, Massachusetts Historical Commission (MHC), and other relevant consulting parties through the NEPA and National Historic Preservation Act (NHPA) Section 106 processes (36 CFR § 800.3 – 800.13).

§ 11.10.1(L)

Guidelines for marine archaeology assessment in the Ocean SAMP area can be obtained through the RIHPHC in their document, "Performance Standards and Guidelines for Archaeological Projects: Standards for Archaeological Survey" (RIHPHC 2007), or the lead federal agency responsible for reviewing the proposed development.

As described under § 11.10.1(K), the marine archaeological resources assessment has been prepared in accordance with the requirements of the federal agency responsible for reviewing New England Wind (i.e., BOEM).

§ 11.10.1(M)

The potential non-physical impacts of a proposed project on cultural and historic resources shall be evaluated in accordance with 36 C.F.R. § 800.5, assessment of adverse effects, including the introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features. Depending on the project and the lead federal agency, the Ocean SAMP Interagency Working Group may require that a project undergo a visual impact assessment that evaluates the visual impact a completed project will have on onshore cultural and historic resources.

Rhode Island (including Block Island) falls beyond the maximum theoretical area of expected visibility of New England Wind due to the Earth's curvature.

Export cables within the South Coast Variant will not result in any long-term visual impacts. If it becomes necessary to employ the South Coast Variant and a second grid interconnection point is secured, the Proponent will assess the visual impacts of the onshore elements.

§ 11.10.1(N)

A visual impact assessment may require the development of detailed visual simulations illustrating the completed project's visual relationship to onshore properties that are designated National Historic Landmarks, listed on the National Register of Historic Places, or determined to be eligible for listing on the National Register of Historic Places. Assessment of impacts to specific views from selected properties of interest may be required by relevant state and federal agencies to properly evaluate the impacts and determination of adverse effect of the project on onshore cultural or historical resources.

Currently, there are no areas along the Rhode Island coast from which New England Wind is visible.

See response to § 11.10.1(M).

§ 11.10.1(O)

A visual impact assessment may require description and images illustrating the potential impacts of the proposed project.

Currently, there are no areas along the Rhode Island coast from which New England Wind is visible.

See response to § 11.10.1(M).

3.3 Areas of Particular Concern § 11.10.2

§ 11.10.2(A)

Areas of Particular Concern (APCs) have been designated in state waters through the Ocean SAMP process with the goal of protecting areas that have high conservation value, cultural and historic value, or human use value from large-scale offshore development. These areas may be limited in their use by a particular regulatory agency (e.g., shipping lanes), or have inherent risk associated with them (e.g., unexploded ordnance locations), or have inherent natural value or value assigned by human interest (e.g., glacial moraines, historic shipwreck sites). Areas of Particular Concern have been designated by reviewing habitat data, cultural and historic features data, and human use data that has been developed and analyzed through the Ocean SAMP process. Currently designated Areas of Particular Concern are based on current knowledge and available datasets;

additional Areas of Particular Concern may be identified by the Council in the future as new datasets are made available. Areas of Particular Concern may be elevated to Areas Designated for Preservation in the future if future studies show that Areas of Particular Concern cannot risk even low levels of large-scale offshore development within these areas. Areas of Particular Concern include:

1. *Areas with unique or fragile physical features, or important natural habitats;*
2. *Areas of high natural productivity;*
3. *Areas with features of historical significance or cultural value;*
4. *Areas of substantial recreational value;*
5. *Areas important for navigation, transportation, military, and other human uses; and*
6. *Areas of high fishing activity.*

The Proponent is conducting detailed surveys and resource assessments of the South Coast Variant to avoid and minimize impacts to APCs to the maximum extent practicable, including areas with associated risk and natural or assigned value. Detailed resource assessments are included in the COP Addendum and described, herein. The Proponent has also proposed mitigation where avoidance is not possible. The South Coast Variant evaluated in this COP Addendum is located within federal waters and is not within Rhode Island state waters. We understand from CRMC that the principal coastal effects of concern associated with the South Coast Variant development is to glacial moraines. As described in § 11.10.1(B) and § 11.10.1(H), impacts to glacial moraines are expected to be temporary and minimal.

§ 11.10.2(B)

The Council has designated the areas listed below in § 11.10.2(C) of this Part in state waters as Areas of Particular Concern. All large-scale, small-scale, or other offshore development, or any portion of a proposed project, shall be presumptively excluded from APCs. This exclusion is rebuttable if the applicant can demonstrate by clear and convincing evidence that there are no practicable alternatives that are less damaging in areas outside of the APC, or that the proposed project will not result in a significant alteration to the values and resources of the APC. When evaluating a project proposal, the Council shall not consider cost as a factor when determining whether practicable alternatives exist. Applicants which successfully demonstrate that the presumptive exclusion does not apply to a proposed project because there are no practicable alternatives that are less damaging in areas outside of the APC must also demonstrate that all feasible efforts have been made to avoid damage to APC resources and values and that there will be no significant alteration of the APC resources or values. Applicants successfully demonstrating that the presumptive exclusion does not apply because the proposed project will not result in a significant alteration to the values and resources of the APC must also demonstrate that all feasible efforts have been made to avoid damage to the APC resources and values. The Council may require a successful applicant to provide a mitigation plan that protects the ecosystem. The Council will permit underwater cables, only in certain categories of Areas of Particular Concern, as

determined by the Council in coordination with the Joint Agency Working Group. The maps listed below in § 11.10.2(C) of this Part depicting Areas of Particular Concern may be superseded by more detailed, site-specific maps created with finer resolution data.

The Proponent is conducting detailed surveys and resource assessments of the South Coast Variant to avoid and minimize impacts to APCs to the maximum extent practicable, including areas with associated risk and natural or assigned value. Detailed resource assessments are included in the COP Addendum and described, herein. The Proponent has also proposed mitigation where avoidance is not possible. The South Coast Variant is within federal waters and is not within Rhode Island state waters. We understand from CRMC that the principal coastal effects of concern associated with the South Coast Variant development is to glacial moraines. As described in § 11.10.1(B) and § 11.10.1(H), impacts to glacial moraines are expected to be temporary and minimal.

§ 11.10.2(C)

Areas of particular concern that have been identified in the Ocean SAMP area in state waters are described as follows:

1. *Historic shipwrecks, archeological or historical sites and their buffers as described in Ocean SAMP Chapter 4, Cultural and Historic Resources, Sections 440.1.1 through 440.1.4, are Areas of Particular Concern. For the latest list of these sites and their locations please refer to the Rhode Island State Historic Preservation and Heritage Commission.*

   See response to § 11.10.1(K). Additionally, there are no offshore dive sites (most of which are shipwrecks) identified in Figure 11.2 in the Ocean SAMP designated as APCs within the South Coast Variant.

2. *Offshore dive sites within the Ocean SAMP area, as shown in Figure 2 in § 11.10.2 of this Part, are designated Areas of Particular Concern. The Council recognizes that offshore dive sites, most of which are shipwrecks, are valuable recreational and cultural ocean assets and are important to sustaining Rhode Island's recreation and tourism economy.*

   There are no offshore dive sites designated as APCs within the South Coast Variant.

3. *Glacial moraines are important habitat areas for a diversity of fish and other marine plants and animals because of their relative structural permanence and structural complexity. Glacial moraines create a unique bottom topography that allows for habitat diversity and complexity, which allows for species diversity in these areas and creates environments that exhibit some of the highest biodiversity within the entire Ocean SAMP area. The Council also recognizes that because glacial moraines contain valuable habitats for fish and other marine life, they are also important to commercial and recreational fishermen. Accordingly, the Council shall designate glacial moraines as identified in Figures 3 and 4 in § 11.10.2 of this Part as Areas of Particular Concern.*

See responses to § 11.10.1(B) and § 11.10.1(H).

4. *Navigation, military, and infrastructure areas including: designated shipping lanes, precautionary areas, recommended vessel routes, ferry routes, dredge disposal sites, military testing areas, unexploded ordnance, pilot boarding areas, anchorages, and a coastal buffer of 1 km as depicted in Figure 5 in § 11.10.2 of this Part are designated as Areas of Particular Concern. The Council recognizes the importance of these areas to marine transportation, navigation and other activities in the Ocean SAMP area.*

   The South Coast Variant avoids navigation, military, and infrastructure areas to the maximum extent practicable. Existing vessel traffic along the South Coast Variant is described in the Vessel Crossing Analysis provided as Appendix G in the New England Wind COP Addendum. See Section 7.8 of COP Volume III for a description of New England Wind activities that may affect navigation and vessel traffic within the Offshore Development Region, including the South Coast Variant, and a detailed Navigation Safety Risk Assessment is provided as Appendix III-I of COP Volume III.

5. *Areas of high fishing activity as identified during the pre-application process by the Fishermen's Advisory Board, as defined in § 11.3(E) of this Part, may be designated by the Council as Areas of Particular Concern.*

   During construction, it is expected that commercial fishing will be restricted only in the 3.14 km^2 temporary safety buffer zone established around where cable installation activities are taking place. For additional information on fisheries studies and proposed avoidance, minimization, and mitigation efforts, see § 11.10.1(C) and § 11.10.1(F).

6. *Several heavily-used recreational boating and sailboat racing areas, as shown in Figure 6 in § 11.10.2 of this Part, are designated as Areas of Particular Concern. The Council recognizes that organized recreational boating and sailboat racing activities are concentrated in these particular areas, which are therefore important to sustaining Rhode Island's recreation and tourism economy.*

   There are no recreational boating areas designated as APCs within the South Coast Variant OECC.

7. *Naval fleet submarine transit lanes, as described in Ocean SAMP Chapter 7, Marine Transportation, Navigation, and Infrastructure Section 720.7, are designated as Areas of Particular Concern.*

   Existing vessel traffic along the South Coast Variant is described in the Vessel Crossing Analysis provided in Appendix G. See Section 7.8 of COP Volume III for a description of New England Wind activities that may affect navigation and vessel traffic within the Offshore Development Region, including the South Coast Variant, and a detailed Navigation Safety Risk Assessment is provided as Appendix III-I of COP Volume III.

8. *Other Areas of Particular Concern may be identified during the pre-application review by state and federal agencies as areas of importance.*

§ 11.10.2(D)

Developers proposing projects for within the renewable energy zone as described in § 11.10.1(B) of this Part shall adhere to the requirements outlined in § 11.10.2 of this Part regarding Areas of Particular Concern in state waters, including any Areas of Particular Concern that overlap the renewable energy zone (see Figure 7 in § 11.10.2 of this Part).

The South Coast Variant is not proposed within the Renewable Energy Zone, or any APCs located within Rhode Island state waters.

3.4 Prohibitions and Areas Designated for Preservation (§ 11.10.3)

§ 11.10.3(A)

Areas Designated for Preservation are designated in the Ocean SAMP area in state waters for the purpose of preserving them for their ecological value. Areas Designated for Preservation were identified by reviewing habitat and other ecological data and findings that have resulted from the Ocean SAMP process. Areas Designated for Preservation are afforded additional protection than Areas of Particular Concern (see § 11.10.2 of this Part) because of scientific evidence indicating that large-scale offshore development in these areas may result in significant habitat loss. The areas described in § 11.10.3 of this Part are designated as Areas Designated for Preservation. The Council shall prohibit any large-scale offshore development, mining and extraction of minerals, or other development that has been found to be in conflict with the intent and purpose of an Area Designated for Preservation. Underwater cables are exempt from this prohibition…

The South Coast Variant is not located within RI state waters and will not affect any Areas Designated for Protection.

3.5 Other Areas (§ 11.10.4)

§ 11.10.4(A)

Large-scale projects or other development which is found to be a hazard to commercial navigation shall avoid areas of high intensity commercial marine traffic in state waters. Avoidance shall be the primary goal of these areas. Areas of high intensity commercial marine traffic are defined as having 50 or more vessel counts within a 1 km by 1 km grid, as shown in Figure 9 in § 11.10.4(B) of this Part.

No physical structures of New England Wind that would pose a hazard to commercial navigation are located within Rhode Island state waters.

Existing vessel traffic along the South Coast Variant is described in the Vessel Crossing Analysis provided as Appendix G. See Section 7.8 of COP Volume III for a description of New England Wind activities that may affect navigation and vessel traffic within the Offshore Development Region, including the South Coast Variant, and a detailed Navigation Safety Risk Assessment is provided as Appendix III-I of COP Volume III. The findings are summarized below.

Temporary Impacts to Navigation and Vessel Traffic During Construction

Construction of New England Wind will require the use of construction and support vessels that will transit along the OECC, and along vessel routes between the OECC and one or more ports. The Proponent has identified several port facilities in Massachusetts, Rhode Island, Connecticut, New York, and New Jersey that may be used for major construction staging activities, which may require vessel transits through Rhode Island state waters (see Sections 3.2.2.5 and 4.2.2.5 of COP Volume I). For a more detailed discussion on navigation and vessel traffic, see Appendix III-I in COP Volume I, Appendix III-S of COP Volume III, and Appendix G in the New England Wind COP Addendum.

Overall, vessel traffic density along the South Coast Variant is relatively low, with the highest concentration of traffic as one approaches the continental mainland. The Proponent will continue to work with ferry operators, harbor pilots, and other vessel operators to ensure any impacts to commercial vessel traffic are minimized to the greatest extent practicable.

Navigational conflicts are not anticipated to be a common occurrence see the response to § 11.10.1(C) and Appendix G of the New England Wind COP Addendum. Increased vessel traffic is not anticipated to result in significant disruption of vessel traffic in and around the Rhode Island ports. Mitigation measures are described in the response to § 11.10.1(C), Section 7.8.2.1.5 of COP Volume III, and Appendix G of the New England Wind COP Addendum.

Impacts to Navigation and Vessel Traffic During Operations

O&M vessels will operate in the OECC infrequently, primarily to conduct inspections of the offshore export cables on a scheduled maintenance timetable (see Sections 3.3.2 and 4.3.2 of COP Volume I). Few impacts to existing vessel traffic, including passenger vessel traffic, are anticipated from O&M activities along the OECC (see also Appendix III-S of COP Volume III and Appendix G of the New England Wind COP Addendum).

3.6 Application Requirements (§ 11.10.5)

§ 11.10.5(A)

For the purposes of this document, the phrase "'necessary data and information'" shall refer to the necessary data and information required for federal consistency reviews for purposes of starting the Coastal Zone Management Act (CZMA) six-month review period for federal license or permit activities under 15 C.F.R. Part 930, Subpart D, and OCS Plans under 15 C.F.R. Part 930, Subpart E, pursuant to 15 C.F.R. § 930.58(a)(2). Any necessary data and information shall be

provided before the six-month CZMA review period begins for a proposed project or at the time the applicant provides the consistency certification. It should be noted that other federal and state agencies may require other types of data or information as part of their review processes.

The New England Wind COP Addendum has been submitted in accordance with BOEM's regulations governing COP submissions. Table 1.4-1 of COP Volume I lists BOEM's COP regulations and where the corresponding information can be found throughout the New England Wind COP. Additional information is included in the New England Wind COP Addendum. The Proponent will provide any necessary data and information required for the CZMA review.

3.7 Monitoring Requirements (§ 11.10.6)

§ 11.10.6(A)

The Council in coordination with the Joint Agency Working Group, as described in § 11.9.7(I) of this Part, shall determine requirements for monitoring as specified in § 11.9.9 of this Part. For CZMA federal consistency purposes the Council must identify any baseline assessments and construction monitoring activities during its CZMA six-month review of the COP.

The South Coast Variant, if used, will be carefully monitored during construction, operation, and decommissioning. The Proponent has already conducted numerous resource assessments and surveys to characterize the South Coast Variant including, but not limited to, marine archaeological resources assessments, essential fish habitat assessments, and benthic habitat surveys. The Proponent's pre-, during-, and post-construction surveys and monitoring will generate a substantial body of environmental, fisheries, and other data, further augmenting scientific understanding of the Offshore Development Area. The Proponent has collaborated and will continue to collaborate with federal and state agencies to design surveys that align with established survey methods so that the data generated can be compared to previous data and ongoing regional studies to support a regional, longer-term study program to monitor the regional impacts of offshore wind development.

Resource-specific baseline assessments and construction monitoring plans are discussed throughout Volume III of the COP and the New England Wind COP Addendum and appendices. Specific examples of such monitoring plans include but are not limited to:

- **Fisheries Studies:** See responses the responses to § 11.10.1(C) and § 11.10.1(F) as well as Sections 4.1, 6.6, and 7.6 of COP Volume III for details.

- **Benthic Habitat Monitoring**: As described under § 11.10.1(F) and in Appendix I of the New England Wind COP Addendum, the Proponent is committed to developing an appropriate benthic monitoring framework for the South Coast Variant, should it be necessary, in consultation with BOEM and other agencies as appropriate.

It is expected that New England Wind's monitoring plans will continue to be refined through the federal review and approval process.

4.0 CONCLUSION

The Proponent has demonstrated that the proposed action described herein and in the New England Wind COP and COP Addendum complies with the applicable enforceable policies of Rhode Island's approved Coastal Resource Management Program and will be conducted in a manner consistent with such Program.