



United States Department of the Interior

BUREAU OF OCEAN ENERGY MANAGEMENT
WASHINGTON, DC 20240-0001

Mr. Peter Allen
DWW Rev I, LLC
56 Exchange Terrace
Suite 300
Providence, Rhode Island 02903

Dear Mr. Allen:

I am writing on behalf of the Bureau of Ocean Energy Management (BOEM), Office of Renewable Energy Programs, regarding DWW Rev I, LLC's (Revolution's) regulatory departure request submitted on March 31, 2020, pursuant to 30 C.F.R. § 585.103. Through this letter, BOEM approves Revolution's departure request.

In its letter, Revolution requested regulatory departures from 30 CFR § 585.626(a)(4)(ii)-(iii) requirements to provide detailed in situ geotechnical data at each proposed foundation location and a minimum of one deep boring (with soil sampling and testing) at each edge of the project area at the time of Construction and Operations Plan (COP) submittal. Instead of submitting the in situ geotechnical data with the COP, Revolution proposes to provide the data no later than with its submittal of the Facility Design Report (FDR), when the project design and associated project design envelope is more mature.

BOEM's review indicates that the initial COP submission and the supplemental submission that contains a detailed geologic ground model provides an adequate geotechnical assessment. The ground model, along with several deep borings and pile drivability assessments, is sufficient to demonstrate the feasibility of the proposed foundations to support the proposed offshore wind farm components based on the assumption made in the model that piles will avoid boulders during driving. However, supplemental data provided show a significant number of boulders both at the surface and at depths where piles will be driven without a discussion of the methodology that will be used to avoid the boulders. BOEM requests that this methodology be provided in a supplement to the COP using the current level of data.

The geotechnical investigations at final foundation locations, updated geotechnical analyses with foundation design parameters, and a Final Marine Site Investigation Report must be submitted with, or prior to, the FDR as a condition of this approval.

BOEM finds that granting this departure would facilitate appropriate lease activities in accordance with 30 C.F.R. § 585.103(a)(1) by granting Revolution additional flexibility with respect to its final component and project design without adversely affecting the quality and scope of BOEM's review.

BOEM also finds that the requested departures comply with 30 C.F.R. § 585.103(b). Because Revolution would not be able to commence construction activities until BOEM has had an opportunity to review the full suite of information under its regulations, the departure request is consistent with Subsection 8(p) of the Outer Continental Shelf Lands Act and granting it would protect the environment and the public health and safety to the same degree as if there were no approved departure. Approval of the departure request will not impair the rights of third parties because it is not expected to impact other lessee or stakeholder rights.

If there are any questions, please contact Jessica Stromberg at jessica.stromberg@boem.gov or (703) 787-1730.

Sincerely,

James F. Bennett
Chief
Office of Renewable Energy Programs