



RHODE ISLAND
SALT WATER
ANGLERS
Association



P.O. Box 299, Tiverton, Rhode Island 02878

401-826-2121

www.RISAA.org

January 9, 2023

Michelle Morin
Chief, Environment Branch for Renewable Energy
Bureau of Ocean Energy Management
45600 Woodland Road
Sterling, VA 20166

Re: An Open Letter concerning installation of Offshore Wind Energy Cables in the Sakonnet River

Dear Ms. Morin:

The Rhode Island Saltwater Anglers Association (RISAA) and other organizations listed below are writing this letter to express our concern regarding potential negative effects of installing high-power electrical transmission cables in the Sakonnet River, especially when alternative, land-based routes are available that would eliminate the need for this installation. We believe that running an underwater cable in the Sakonnet River violates the Public Trust Doctrine in Rhode Island's Constitution which requires by "all means necessary and proper by law to protect the natural environment" for Rhode Island waters. There is significant uncertainty about the ecosystem risk to the Sakonnet River fishery from the Mayflower cable. A land-based alternative cable route through Massachusetts will eliminate this risk to the Sakonnet River ecosystem and protect the rights of the Rhode Island people as guaranteed by the Rhode Island Constitution.

The Sakonnet "river" is a tidal straight that is part of Narragansett Bay. It is relatively unique in all of Southern New England. The Sakonnet River and its surrounding communities are sparsely populated with little commercial or industrial development along most of its length. There is heavy recreational use of the Sakonnet River throughout its length. The Sakonnet is home to many important species and is **designated critical habitat for juvenile cod** by the New England Fisheries Management Council and the Rhode Island Coastal Resources Management Council. It is also habitat for whelk, quahogs and a variety of finfish from scup to tautog (blackfish). In fact, the Rhode Island whelk fishery relies heavily on the Sakonnet River. Whelk have very limited range, moving only minimal distances their entire life. Installation of the cable directly through their habitat will cause direct/ fatal impact to any whelk within the plow zone and they may be unwilling to cross the cable and its EMF emissions after the cable is electrified. This has the potential to bisect the River's whelk biomass into a distinct east and west zone.

The uncertainty and risk of damage by the installation of high-powered electrical transmission cables in the Sakonnet River ecosystem is a violation of Rhode Island's Public Trust Doctrine¹. Rhode Island's Constitution declares that we must "*adopt all means necessary and proper by law to protect the natural environment of the people of the state*" and there must be "*adequate resource planning for the control and regulation of the use of the natural resources of the state and for the preservation, regeneration and restoration of the natural environment of the state.*" At a public presentation in Portsmouth, Rhode Island on November 17, 2022 fisheries experts from Rhode Island Department of Environmental Management and the University of Massachusetts Dartmouth said they were unsure of the potential

The Rhode Island Saltwater Anglers Association represents over 7,500 recreational anglers and 28 affiliated clubs

¹ Article 1 Section 17 Rhode Island Constitution

negative effects of electromagnetic force (EMF) on the various species of sea life in the Sakonnet². This lack of information from independent fisheries experts falls short of “adequate resource planning.” While the experts proposed some parameters for before/after studies, any negative effects discovered would be actual effects on existing populations that could not be “undone”.

Recreational and commercial fishing, boating, tourism, and other recreational uses of the Sakonnet generate significant value for the people of Rhode Island. However, the benefits to the people of Rhode Island from the Mayflower Wind project (as stated on the company website) are vague and ill-defined at best and not credible at worst³. The Mayflower Wind project is a Massachusetts project and the electricity produced will be dedicated to Massachusetts customers exclusively. There is no reason for Rhode Island to risk habitat, fishing opportunities, and the existing commercial value of the Sakonnet when there is a land-based alternative that eliminates risk in Rhode Island’s waters and removes any violation of Rhode Island’s Constitution.

In addition, this land-based alternative rightly falls under Massachusetts regulatory authority where the value of the electricity generated from this project accrues. Any cable from the Offshore Wind Energy leases south of New England heading to the former Brayton Point Power Station can land in Westport, Massachusetts; less than a half mile south of the terminus of Massachusetts Route 88. This road provides a corridor north approximately eleven miles to Route 6 or Route 195, both of which cross the Taunton River providing access to the former power station at Brayton Point. Route 88 has few private residences or businesses along the entire route, with only four perpendicular road crossings: Drift Road, Hixbridge Road, Old County Road and American Legion Highway (route 177). Moreover, this land-based route removes the risk from Rhode Island waters and is likely more conducive to the project because of existing land-based corridors and infrastructure in Massachusetts. At this point 30% design drawings are published for the Sakonnet/ Portsmouth/ Mt. Hope Bay route. We ask that design drawings at the same level be created for the land- based alternative route so that both routes can be equally evaluated.

Given the fragile nature of the Narragansett Bay Watershed, the fact that the Sakonnet River is classified as Type 2 waters (set aside for low intensity use) and due to significant uncertainty about the potential impact of running underwater cables in these waters, we urge BOEM and all regulatory bodies as well as the developer to insist on installation of all offshore wind energy export power cables over land routes when such route is an available option to installation in the marine environment.

Rhode Island Saltwater Anglers Association and all signatures shown on the following page

Sincerely,

Greg Vespe

Greg Vespe
Executive Director
RISAA

² Presentation link: https://drive.google.com/file/d/1gUjoUW4FO7pfakspl-arsW2rqbzSQGkG/view?usp=share_link

³ See “How will the project benefit Portsmouth and broader Rhode Island?” at: <https://mayflowerwind.com/project-faqs/>

Cc: Senator Whitehouse, Senator Reed, Rep. Cicilline, Rep. Magaziner, EcoRI, Providence Journal, Sakonnet Times, Boston Globe (Brian Amaral), RIDEM, CRMC, RI EFSB, Janet Coit, Tiverton Town Council, Tiverton Harbor Commission, Tiverton Conservation Commission, Little Compton Town Council, Little Compton Harbor Commission), RISAA Legislative Committee

-
- | | |
|---|---------------------------------------|
| 1. Greg Vespe, Executive Director, RISAA | 30. David Latham, Matunuck |
| 2. Peter Jenkins, Saltwater Edge, Newport | 31. Donald Libbey, Tiverton |
| 3. Stephanie Beebe, Tiverton | 32. Jim Mallinson, Middletown |
| 4. Frances Booth, Newport | 33. Edward Marianacci, Tiverton |
| 5. Steven Booth, Newport | 34. Douglas Marzonie, Little Compton |
| 6. Dick Bordeau, Little Compton | 35. Virginia Marzonie, Little Compton |
| 7. Marybeth Bradbury, Tiverton | 36. Sandra Mataronas, Little Compton |
| 8. Charles Brightman, Tiverton | 37. Glenn Melanson, Tiverton |
| 9. Sarah Buck-Herdich, Little Compton | 38. Kenneth Mendez, Tiverton |
| 10. Kelly Clemens, Tiverton | 39. Liz Mendez, Tiverton |
| 11. Joe Cleverdon, Tiverton | 40. Kathleen Metcalf, Tiverton |
| 12. Thomas Cody, Tiverton | 41. Richard Metcalf, Tiverton |
| 13. Shannon Craft, Portsmouth | 42. Barbara Milotte, Tiverton |
| 14. Ralph Craft, Portsmouth | 43. Anthony Pereira, Tiverton |
| 15. Francesca Dalglish, Little Compton | 44. Charles Petras, Cumberland |
| 16. Judith Danforth, Little Compton | 45. David Rose, Tiverton |
| 17. Pamela Dawson, Little Compton | 46. Mara Shore, Little Compton |
| 18. Kirsten Dawson, Little Compton | 47. Carol Solimene, Tiverton |
| 19. Mark DePiero, Tiverton | 48. Gina Sousa, East Wareham, MA |
| 20. Norma Doire , Tiverton | 49. Bill Thompson, Tiverton |
| 21. David Donoghue, Tiverton | 50. Taylor Valliant, Little Compton |
| 22. Susan Donoghue, Tiverton | 51. Janice Vincent, Tiverton |
| 23. Susan Erstling, Tiverton | 52. Janice Walker, Tiverton |
| 24. Susan Estabrook, Newport | 53. Lynne White, Little Compton |
| 25. Jamie French, Tiverton | |
| 26. Jessica Gale, Tiverton | |
| 27. Martina Halsey, Little Compton | |
| 28. Lynn Kaye, Middletown | |
| 29. Elizabeth Knight, Little Compton | |