

Dear Facilities Siting Board Members,

Thank you for all of the services you perform for RI and its citizens. I am writing on behalf of Green Oceans, a new organization as of January 2023, and am sorry we have not been involved sooner. On the website for the Facilities Planning Board, it mentioned that you would receive comments up until the time the board makes its final decision. We hope you will consider our concerns outlined below.

RISK OF WATER CONTAMINATION

First and foremost, we are concerned about the public health implications of burying the cable up the length of the West Passage to North Kingston.

According to a recent [EcoRI article](#), North Kingston is considered one of the most contaminated sites in the U.S. The company plans to trench up the West passage to North Kingston, using jet plows to bury the cable 4-6 feet below the riverbed. This process will create sediment plumes that could resuspend toxic chemicals into the water column. Through bioaccumulation and biomagnification, this could contaminate the marine food web and compromise human and wildlife health. The project developers (Ørsted) did not take samples of the sediments throughout the region they plan to disturb during the trenching and did not test for all of the known toxins in the area.

According to the Marine Dredging report the company provided to the CRMC, they only took 6 cores for analysis, all within 1000 feet from the shore in the region corresponding to the cable landing site. They divided these 6 cores into 20 total samples, but did not analyze any sediments along the rest of the trenching areas.

Given that jet plow trenching will create sediment plumes from material buried 4-6 feet below the riverbed, and that this process will extend the length of the west passage, 6 cores within 1000 feet of shore does not seem like an adequate analysis.

Of the samples they did test, results suggest that the sediments will contaminate the water column. The testing demonstrated elevated levels of lead that exceeded the “leachability Criteria” in one sample and exceeded the “beach disposal” criteria in another sample. (10%)

The testing also detected levels that exceeded the “beach disposal” criteria for Arsenic in 5 samples (25%); Chromium and Copper in 2 samples (10%); Nickel in 4 samples (20%), Zinc in 9 samples (45%).

Once in the water column, these high levels have the potential to infiltrate the marine food web. Bioaccumulation and biomagnification will contaminate the local fisheries.

Moreover, the company omitted testing for several relevant compounds:

1. PFAS: these “forever” chemicals have been associated with cancers, hyper cholesterol, thyroid disease, etc. The Navy released high levels into the bay from a fire-fighting foam spill and general construction. The Toray Plastics company is

also associated with PFAS release. They can settle into the sediment and can be re-released if the sediment is disturbed.

3. Polycyclic aromatic hydrocarbons (PAHs): these have been released from the Davisville Landfill in North Kingston and may have settled in the Bay, the W. R. Grace company in Providence, the Toray Plastics company (North Kingston);
4. DDT and other pesticides from both landfills and farms
5. Hexavalent Chromium: associated with the W.R. Grace chemical company operating out of Providence
6. Sulfur Dioxide: from Phillips 66 in North Kingston
7. Dioxins: Dow Chemicals in North Kingston. These can also persist in sediment.
8. Benzene: from Philips 66. Benzenes can persist for a long time in sediment.
9. Bisphenol A: an endocrine disruptor, can be released by epoxies and plastics (Toray Plastics)
10. Azo Dyes: from the past textile plants. These can also persist in sediment and can harm human health.

As you may recall, the Biden administration just proposed regulation of the harmful “[forever chemicals](#),” per- and polyfluoroalkyl substances (PFOAs and PFAs). Ørsted has not tested any samples for PFOAs either in the North Kingston site or along the cable’s path.

The US Navy has been identified as a source of these “forever” chemicals in Narragansett Bay and the Quonset Point area. The Navy has used PFAS containing firefighting foam at its installations, including Naval Station Newport, which is located on the eastern shore of Narragansett Bay. The use of this foam has resulted in contamination of the groundwater and surface water in the area, including in the bay itself. The contamination has been detected at several sites, including at the former Naval Air Station Quonset Point and the former Naval Air Station South Weymouth, which are located near the bay. In 2016, the Rhode Island Department of Health issued a fish consumption advisory for several species of fish caught in Upper Narragansett Bay due to high levels of PFAS. The advisory was later expanded to include more species and a larger area of the bay. Toray Plastics in North Kingston has also been associated with the release of PFOAs. The Newport Naval Education and Training Center on Aquidneck and Gould Island has also released PFOAs into the environment.

PUBLIC ACCESS

The public has not had access to 25 out of 51 appendices in the Revolution Wind draft environmental impact statement. This lack of transparency has not allowed the public adequate information to either oppose or accept the project. Granting permission for this project prior to releasing all appendices would be a violation of the public trust.

The appendices that remain confidential include:

- C1 - Certified Verification Agent – Scope of Work (CONFIDENTIAL)
- C2 - Certified Verification Agent – Statement of Qualification (CONFIDENTIAL)
- D - Emergency Response Plan/Oil Spill Response Plan (CONFIDENTIAL)
- E - Safety Management System (CONFIDENTIAL)
- F - Preliminary Cable Burial Feasibility Assessment (CONFIDENTIAL)
- G - MEC/UXO Risk Assessment with Risk Mitigation Strategy (CONFIDENTIAL)
- H - Supplemental Project Information and Conceptual Project Engineering Design Drawings (CONFIDENTIAL)
- I - Foundation Feasibility Study (CONFIDENTIAL)
- M - Marine Archaeological Resources Assessment (CONFIDENTIAL)
- N - Terrestrial Archaeological Resources Assessment (CONFIDENTIAL)
- O1 - Revolution Wind Integrated Geotechnical and Geophysical Site Characterization Study (CONFIDENTIAL)
- O2 - Revolution Wind 2017-2020 Geophysical Surveys, Data Acquisition and Processing Report (CONFIDENTIAL)
- O3 - Field Operations and Final Results Report Revolution Wind Export Cable Route Geotechnical Investigation (CONFIDENTIAL)
- O4 - Measured and Derived Geotechnical Parameters and Final Results: REV01 GT1B Inter Array Cable and Export Cable Route (IAC/ECR) Locations (CONFIDENTIAL)
- O5 - Measured and Derived Geotechnical Parameters and Final Results : REV01 GT1B Wind Turbine Generator and Offshore Substation (WTG/OSS) Locations (CONFIDENTIAL)
- O6 - Preliminary Field Results Report: REV01 Inter-Array Cable and Export Cable Route (IAC/ECR) Locations (CONFIDENTIAL)
- O7 - Preliminary Field Results Report: REV01 Offshore Substation (OSS) Locations (CONFIDENTIAL)
- O8 - Preliminary Field Results Report: REV01 GT1B Wind Turbine Generator (WTG) Locations (CONFIDENTIAL)
- T - Air Emissions Calculations and Methodology (CONFIDENTIAL)
- U1 - Visual Impact Assessment and Historic Resources Visual Effects Analysis - Revolution Wind Onshore Facilities (CONFIDENTIAL)
- U2 - Historic Resources Visual Effects Analysis - Revolution Wind Farm (CONFIDENTIAL)
- V - Phase 1 Environmental Site Assessment (CONFIDENTIAL)
- W - Metocean Report (CONFIDENTIAL)
- BB - Cultural Resources Avoidance, Minimization, and Mitigation Measures (CONFIDENTIAL)
- CC - Assessment of the Economic Development Benefits of the Proposed Revolution Wind Project (CONFIDENTIAL)

The appendices I have highlighted particularly concern the average citizen. I understand that private companies are sometimes reluctant to reveal “industrial” secrets that might diminish their competitive advantage, but these are issues that do not involve proprietary information, but do directly affect the public.

ALGAL BLOOMS

Thirdly, the Revolution Wind project risks harming the shellfish industry through harmful algal blooms. Rhode Island had to [shut down this fishery](#) for the first time in the history of the state after the introduction of the Block Island Wind farms

due to high levels of domoic acid. Algae are more likely to produce domoic acid, a deadly neurotoxin, when nutrients are imbalanced and water oxygenation levels are low. Studies from Europe demonstrate that wind turbines [decrease water oxygenation](#) levels. The [invasion of filter feeders](#) on the monopiles of the turbines will alter nutrient levels. Britain and Europe have seen a large increase of harmful algal blooms and large [die-offs of lobsters and crabs](#). No one has made a direct causative link between offshore turbines and these events, but the timing is correlated.

We urge this board to deny the Revolution Wind project permission to proceed.

If the siting board proceeds with permitting this project, Rhode Island may experience unanticipated negative consequences to public health, to the economy, and to the safety of its citizens.

Please include this email and document in the public record.

My best,

Elizabeth Quattrocki Knight, M.D., Ph.D.

–written on behalf of Green Oceans