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PUC Docket SB-2022-02

CRMC File 2022-03-80

BOEM-2021-0062

TO: Executive Director Willis and the Rhode Island CRMC

As a resident of Portsmouth, Rhode Island I am writing to you in opposition to the Southcoast Wind proposed cable route. As you may know Southcoast Wind has proposed a route that comes up the Sakonnet River tidal basin and cuts across Island Park beach and Portsmouth, through a residential area, before going back out into Mount Hope Bay over to Brayton Point in Massachusetts. I thought it would be useful for you to be aware of the position of residents of Portsmouth as you eventually render your federal consistency decision on that route.

First, it is clear from the location of connecting to the New England power grid at Brayton Point that the majority of power will go to Massachusetts and not RI. Since the Brayton Point facility will connect to the New England Power Grid, the power will be distributed by load to those areas that have the most power demands, i.e. Massachusetts. I have asked MayFlower/Southcoast Wind for the single line power distribution plans (that is a well known technical term in power engineering) for the Brayton Point facility but they have not provided that information. A proportionate calculation by population would show that over 90% of the energy will go to Massachusetts and elsewhere in NE and maybe even up to 100% at peak demand. According to a document from the Department of Energy (DOE) entitled Offshore Wind Market Report 2022, Southcoast/MayFlower has already secured 20 year power supply offtake agreements with utility companies in Massachusetts. Any suggestion that Rhode Island will get the majority benefit of energy from that facility is patently false. As an agency representing Rhode Island I assume you have an interest in this matter.

I have read the Bureau of Ocean Energy Management's (BOEM), Draft Environment Impact Statement (DEIS) and many supporting documents. There are other credible organizations and experts who have provided evidence, such as Green Oceans, in opposition to offshore wind farms and the severe impact it will have on wildlife and the environment. I'll leave it to them to continue to make that compelling case. However, my position is that the work done by federal agencies on the proposed cable routes is woefully inadequate. Almost as if they were minimizing what I believe is the most significant impact to humans in the entire wind farm projects, the cable routes.

Let me quote from section 2.1.3. Alternative C-Fisheries Habitat Minimization. "BOEM worked with MayFlower Wind to identify onshore cable routes to avoid the Sakonnet River and identified two onshore route alternatives as described below". First question, why didn't they meet with residents of the community impacted the most by the route rather than just the developer who may have a vested interest in securing the easiest and least cost route? They then go on to dismiss the two alternatives, one going through another beach in Middletown and another through Little Compton and Tiverton. These alternative routes were presumably given to them by MayFlower and easily dismissed. It appears the objective was to steer them to the one through Portsmouth suggested, proposed, and aggressively promoted by MayFlower Wind. Interesting.

There are numerous other alternatives that might cost more for them but have less impact on residents of RI that were never ever considered. These include routes in Massachusetts through Westport and other locations that have highway and utility rights of way or are industrial in nature that could be used. We all must ask what is the real reason that these routes were dismissed? Was it based on economics, engineering, or politics?

I contend that the cable route recommended cutting across Portsmouth will have the greatest environmental impact on wildlife, recreation, and the safety of humans. The Sakonnet river is a pristine habitat that should be protected at the highest levels rather than used as a conduit for high power cables. In fact, the CRMC's own assessment categorizes the Sakonnet as Type 1, pristine. **THIS ALONE SHOULD BE THE ONLY REASON NEEDED TO PREVENT ANY APPROVAL FOR HIGH VOLTAGE CABLING THROUGH THIS AREA.**

<https://www.rigis.org/datasets/edc::water-use-categories/explore?location=41.611814%2C-71.398453%2C14.72>

A more appropriate location would be an industrial location, or a navy base, or a port that is not residential or recreational. I have asked Mayflower/Southcoast for cost benefit analysis of alternative routes but have not received any. I have to wonder why they won't make that information publicly available to support their case. And I contend that any redactions in BOEM and other federal documents with such information are unacceptable. Wind projects off and into our shore impact the public and the public has a right to know everything. Maybe the CRMC can have a bigger impact than me on assuring complete transparency in this process before any decision is rendered.

Here is another indicator that the Portsmouth landfall location is inappropriate. I heard the US Navy objected to a proposed route up the west side of Aquidneck Island because it would be too close to their Navy facility. Now, I respect and admire our armed forces and maybe in this case they know more about the dangers than all of us. But, if a cable route is not safe for our men and women in the military, then it certainly is not safe for children on a beach swimming or windsurfing or waterskiing in the Sakonnet off of Island Park. Or isn't safe for our many elderly residents who walk the shore every day in Island Park Portsmouth, many who have lived there peacefully for their entire lives.

Furthermore, recently the CRMC has taken some strong positions against the impact of ocean floor sediment disturbance, in some cases of dangerous toxic sediments, as a result of coastal activity including raising a sunken barge. As an environmentalist I thank you for that. There are others who are more knowledgeable about talking about the risks to marine and other wildlife than I am, but it is a real risk. You don't need a PhD in environmental science to know that the impact of high power underwater cable trenching up a very narrow and shallow tidal basin, a recreational area, the Sakonnet River tidal basin, will have an order of magnitude more negative impact than anything else we have ever seen in RI

So here is what I am requesting. I would request first that a Massachusetts electric plant should be required to landfall in Massachusetts and not pass through not Rhode Island coastal waters. In fact, I challenge Gov. McKee and the RI legislature to make this a law to protect Rhode Island from becoming

the power alley for the northeast wind industry. It was clearly an oversight when Rhode Island legislated goals for renewable energy. We can have renewable energy and a safe environment today. Clearly the laws and the proposed projects don't do that.

There are numerous alternatives on the Southcoast, including routes Massachusetts that would be less impactful to RI and residents than their proposed route. They need to be considered, seriously, not dismissed categorically. But if we allow this in RI at a minimum, there should never ever be an undersea/underground high power cable route allowed under the water in a recreational area or pristine habitat, through a public beach, and through a residential community. Furthermore, rather than have numerous cable routes crossing our narrow southern shore CRMC must insist on only one cable route for all projects to an industrial site. Then if there is ever a need to restrict access to that location, which I believe we will see that day once the real studies and data get published, the entire RI shore will not have to be shut down. Other states, such as the states of NY and NJ have taken that position.

The BOEM DEIS, clearly in my opinion does not adequately represent the interests of coastal RI, RI communities, and RI residents. Particularly when it comes to the proposed cable routes. Maybe they did their job as it is defined, but now it is the time for you the CRMC, and the PUC to do yours, representing Rhode Island and not concur with this route.

I live on the RI coast and respect what the CRMC and DEM do in their jobs every day to protect our coast and environment. Sometimes your rules and regulations can be annoying, but we appreciate the need for it. You do a great job protecting our coast and we thank you! However, if you allow Southcoast Wind to come up the Sakonnet, a Type 1 water area, and landfall on a community beach, through a marine recreational area, and through a residential area, then everything else that you have done or will do in the future may not matter as your credibility will always be in question. **I take the position that we cannot allow our environment and residents to be harmed today for the promise of protecting the environment from climate change in the future. The proposed route through Portsmouth gives us one at the expense of the other. We can and deserve to have both.**

So, in conclusion I ask that you quickly deny the route and demand a less impactful industrial alternative before this process proceeds any further. Even if it costs the developer more money and time. If an industrial site, Quonset point (Type 5), is the landfall for an energy facility (Revolutions Wind) that primarily benefits Rhode Island then certainly a facility that primarily benefits Massachusetts (Brayton Point) should not be allowed to harm a RI residential/recreational community. **Back to square one and Save our Sakonnet**

I am available to meet with anybody from the CRMC or any other agency to discuss further.

Thank you.



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