

March 6, 2024

Rhode Island Department of Environmental Management  
Office of Customer & Technical Assistance  
Attention: Ronald Gagnon  
235 Promenade Street  
Providence, RI 02908

**Re: SouthCoast Wind Energy LLC, RIDEM File Number: DP-23-198, WQC 23-044**

Dear Mr. Gagnon,

Thank you for the opportunity to provide comment on SouthCoast Wind's application for a State of Rhode Island Dredge Permit and Water Quality Certification. Save The Bay supports the responsible development of offshore wind. We believe the permitting, construction, and operation of all renewable energy projects should carefully consider all pertinent environmental factors and mitigate impacts to the maximum extent practicable, regardless of cost to the developer. We urge the Department of Environmental Management (DEM), and all permitting authorities, to carefully consider the best available science and require best management practices when issuing these important permits. Our specific comments are provided below.

**Purpose and Need.** In 2023, SouthCoast wind terminated its power purchase agreements related to this project. Based on this termination, the Rhode Island Energy Facility Siting Board and Coastal Resources Management Council have paused State permitting for SouthCoast. Given the current lack of a customer for SouthCoast's proposed wind farm, Save The Bay questions whether it is prudent for DEM to move forward with the Dredge Permit and Water Quality Certification at this time. When State permitting occurs in a piecemeal fashion without the whole project scope available for review, effective public participation and input is hindered.

**Sediment Testing.** Save The Bay is concerned by the lack of sediment testing data, particularly in Mount Hope Bay and in the vicinity of the proposed horizontal directional drilling (HDD) pits. This concern is based on the significant past industrial discharges along the Taunton River and in Mount Hope Bay. Studies, and the Narragansett Bay Estuary Program's most recent *State of Narragansett Bay and its Watershed* report have identified elevated levels of heavy metals and other contaminants based on historic uses and discharges. Targeted sediment testing should be required prior to dredging if there is no recent data available on contaminant levels immediately in and around the HDD pits and export cable route.

**Cable Burial.** As Rhode Island has learned from the Block Island Wind Farm, cable burial depth is critical to the successful operation of the project. The applicant states that "anticipated cable burial depth range is 3.2 to 13.1 ft with a target cable burial depth of 6.0 feet" (Application § 2.3.1). Save The Bay urges DEM to carefully review all areas where the applicant claims that target burial depth may not be met. Proper seabed preparation and cable burial reduces future risks to marine species and other users of Narragansett Bay. With

regard to seabed preparation, the applicant should prioritize use of a boulder grab over a boulder plow to limit impacts to benthic and other habitats. Increased cost should not be considered as the reason to use more invasive methods. Given the confidential nature of SouthCoast's Cable Burial Risk Assessment, which the DEM has access to, the public must rely on DEM's expert analysis in this area.

**Electromagnetic Fields (EMF).** The applicant states that "currently available scientific evidence does not provide support for concluding there would be population-level harm to marine species from EMFs associated with HVDC submarine transmission" (Application § 3.3.2.5). Save The Bay shares this view based on reviews of relevant scientific literature. However, studies also show that EMF levels and associated effects on marine species may be reduced, if not eliminated completely, by achieving target burial depth. Careful cable routing and burial depth must be prioritized over other factors such as cost in order to mitigate impacts, including avoidance of Essential Fish Habitat and other sensitive habitats where possible.

Save The Bay urges the Department of Environmental Management to exercise its authority under the federal Clean Water Act and other applicable statutes to protect the Sakonnet River and Mount Hope Bay by requiring the applicant to avoid and minimize all potential impacts from dredging and placing cables and, where necessary, mitigate impacts.

Thank you for considering our comments.

Sincerely,



Michael Jarbeau  
Narragansett Baykeeper  
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