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September 30, 2021

VIA E-MAIL AND HAND DELIVERY

Emma.Rodvien@puc.ri.gov

Emma Rodvien, Coordinator
Energy Facility Siting Board
89 Jefferson Boulevard
Warwick, Rhode Island 02888

Re: Docket No. SB-2021-01 – In Re: Revolution Wind, LLC’s Application to Construct and Alter Major Energy Facilities in North Kingstown, Rhode Island

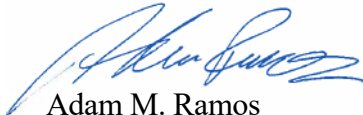
Dear Ms. Rodvien:

Enclosed please find an original and four copies of Revolution Wind, LLC’s (“Revolution Wind”) Responses to the Energy Facility Siting Board’s First Set of Data Requests, issued on September 23, 2021 (the “First Set of Data Requests”).

This filing includes Revolution Wind’s responses to the First Set of Data Requests EFSB 1-1 through EFSB 1-7. This completes Revolution Wind, LLC’s responses to the First Set of Data Requests.

Thank you for your attention to this matter.

Very truly yours,



Adam M. Ramos



Robin L. Main

AMR:cw
Enclosures

cc: SB-2021-01 Service List (via e-mail)
Meredith Brady (via hand delivery)

SB-2021-01 Revolution Wind, LLC Application for Major Energy Facility**Updated June 23, 2013**

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EFSB 1-1

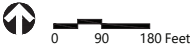
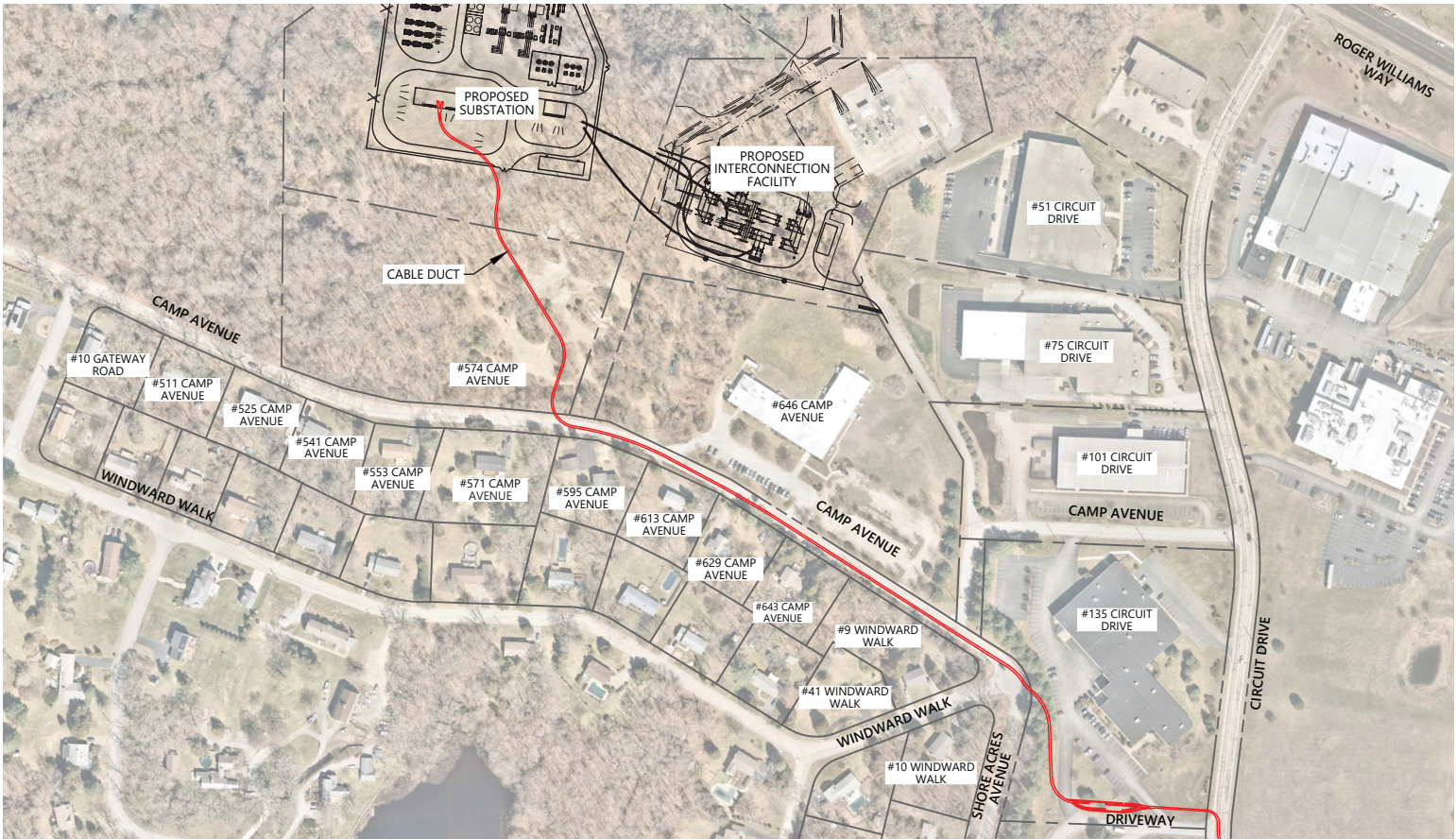
Request:

During the public comment hearing, some residents along Camp Avenue raised concerns about the fact that the transmission cable is proposed to pass through an area where there are residential homes. It was suggested that there might be an alternative route that would have avoided the residential area. Referring to Figure 5-3, please provide a similar aerial photograph, if available, that magnifies the area along Camp Avenue where the residential neighborhood is located near the end of the proposed route before it enters Parcel ID 179-030 & 179-001. Within the photo, please identify each residential home along the cable route, and mark the photo to show the proposed cable route.

Response:

Revolution Wind, LLC refers to the attached figure marked as Attachment EFSB-1.

\\uhh\lighting\proj\Providence\73032.01 RWF Export Cable (2)\Graphics\FIGURES\Camp Ave\Camp Ave Plan.dwg



EFSB 1-2

Request:

It appears from the photograph in Figure 5-3 that there is an access road of some type which leads to Parcel 179-005, which road begins at Camp Avenue at the point where the cable route turns left on Camp Avenue before heading north toward the National Grid substation.

- (a) Please provide a description of such access road, including ownership and its purpose.
- (b) Did the applicant consider using the access road to reach parcels 179-005, 179-030 & 179-001, instead of continuing into the residential area on Camp Avenue? If so, please explain why this alternative was not selected. If not considered, please explain why it was not considered.
- (c) Are there any reasons why the applicant would be prevented from using this access road as alternative means of accessing 179-005, 179-030 & 179-00, in order to avoid the residential area along Camp Avenue? If so, please explain.
- (d) If the EFSB were to require the applicant to use the access road to avoid the residential area, please explain all the practical impacts on the project.

Response:

- a. The access roadway that leads to The Narragansett Electric Company's ("TNEC") Davisville Substation is privately owned by two property owners:

- 75 Circuit Drive, Keifer Park Associates LLC, Plat 179 Lot 017
- 101 Circuit Drive, SPL Associates, Plat 179 Lot 019

TNEC has an easement over these private properties for the purpose of accessing the Davisville Substation and electric distribution facilities and serving its customers in this area.

- b. Yes, Revolution Wind, LLC ("Revolution Wind") initially considered using the access road for the siting of the onshore cable route during the initial design phase of the project, but removed it from consideration based on the process outlined below.

Siting of transmission lines considers a number of components that balance the developed and natural environment, reliability and cost. To determine the onshore cable route, Revolution Wind first factored in the desired Point of Interconnection to the New

England transmission grid at the Davisville substation and the preferred sea-to-shore cable landfall location at the Goodison property. Revolution Wind next identified a location for the OnSS as close as possible to the Davisville Substation on property compatible with its use. The brownfield site offered by QDC is desirable because it minimizes the cable length (and corresponding impacts of the interconnection) and is a beneficial reuse of this historic dump site. The next phase of the analysis was the onshore cable route, including minimizing impacts during construction to the general public and adjacent property owners. Revolution Wind selected an underground transmission system, rather than overhead, to minimize aesthetic impacts and reduce electric and magnetic fields ("EMF"). By providing two adjacent underground electric transmission circuits, Revolution Wind has designed the cable configuration with what is called "optimum phasing" that uses the adjacent cables to cancel the magnetic fields of the overall system. This lowers the magnetic fields from the project. The use of shielded underground electrical cables reduces the electric fields to essentially zero. After selecting the underground system, the project identified every property owner type along the route and sought to minimize impacts for "sensitive uses" during construction. There are no sensitive uses along the route, including schools, daycares, hospitals, museums, fire departments, emergency medical/E911 centers, or police stations. Revolution Wind removed the one recreational area (Blue Beach and its associated parking lot) from consideration for the cable landfall location in response to constructive stakeholder feedback. The result is a route that balances multiple considerations, including what could be acquired from willing sellers, and that minimizes impacts to the environment, to the community, to businesses, and to residential property owners. It is a route that, as much as possible, uses existing, well-developed public rights of way in which utility infrastructure such as this is routinely installed as a reflection of the public interest in minimizing the need to develop new corridors through communities for such uses.

Eversource, as the joint owner of the project, serves millions of electric, gas distribution and water customers from underground facilities, and, in its experience, the preferred location for these facilities is the public roadway. Although we drive our vehicles along these roadways, they are essential for use by utilities to serve our customers in the least impactful manner. We believe the onshore cable route meets these criteria.

c. & d. Revolution Wind determined that there were numerous issues regarding property rights, utility congestion and environmental concerns that justified excluding the access road from further consideration. Specifically, Revolution Wind has identified a number of significant challenges if the project were to utilize the access road, as outlined below:

- The OnSS location, ICF Substation location and transmission cable system routing were the subject of numerous meetings with the principle landowner and

regulatory body in that industrial park (QDC) and the transmission owner (TNEC) and a consensus as to the preferred routing and substation siting options based on available property that was both suitable for the use and met the technical interconnection and engineering needs of Revolution Wind. Revolution Wind also discussed project landfall and routing options with the Town of North Kingstown and the Town has indicated its acceptance of Revolution Wind's preferred substation location and transmission cable routing.

- In connection with one routing option that would have used, in part, the access road as another means of reaching Camp Avenue, Revolution Wind did attempt to acquire permanent and temporary easement rights from one of the private entities (The property owner of parcel 179-019), but that property owner rejected repeated attempts to negotiate an agreement. The primary discussions with this property owner centered on the alternative onshore cable route discussed in the Application, and not explicitly on use of the access road; however, Revolution Wind received the clear message that the property owner would not allow any use of this property. This was not the only refusal to negotiate that Revolution Wind encountered during the course of evaluating routing option alternatives, but serves to highlight the challenges projects often encounter when attempting to assemble a viable route outside established public and utility rights of way.
- TNEC has various existing infrastructure, including electric distribution and telecommunications facilities, along the access road. Revolution Wind would have to cross these facilities and maintain any required separation to avoid mutual thermal heating of the TNEC and Revolution Wind facilities. Revolution Wind considered this a limiting constraint in the engineering evaluation for use of this access road.
- The Revolution Wind OnSS, the ICF, the interconnecting cables between the two substations, and the reconfiguration of the overhead transmission facilities around the ICF and the Davisville Substation were carefully designed as a group through multiple iterations with an integrated approach to avoid and minimize environmental and other impacts and to maximize the amount of electrical equipment to be installed in the minimum amount of space. This included intensive consultation with TNEC to ensure that development of the ICF and interconnecting cables (to be located on TNEC's property) did not interfere with TNEC's current and future use of its substation parcel. These iterations were performed to avoid direct impacts to on-site wetlands, avoid direct impacts to the

vernal pools, avoid populations of sickle-leaved golden aster (a state species of special concern), and minimize impacts to the Native American cultural resources at the site. Assuming a redesign could be done in a manner that is consistent with TNEC's current and future use of the Davisville substation parcel, rerouting the export cable up the access road, through that parcel, and terminating at the Revolution Wind OnSS parcel (after which the interconnecting cables would have to be rerouted to the Davisville Substation and the ICF) would fundamentally transform the orientation of the entire Revolution Wind OnSS and ICF design. Such a rerouting would undo all the avoidance and minimization work performed to date, would require a complete redesign of the OnSS, ICF and reconfiguration of the overhead transmission structures, and likely would mean that some impacts could no longer be avoided or minimized.

The access road to the Revolution Wind OnSS on the preferred route also serves as the transmission cable corridor route and avoids the issues identified above to the greatest extent possible, while providing the desired roadway for installation and allows direct road access to the transmission cable system for the life of the project. The transmission cables also enter the Revolution Wind OnSS at the desired physical location that enables the entire substation equipment layout to be designed in a more optimal arrangement point and in a manner that avoids and minimizes resource impacts while at the same time enabling the optimal arrangement.

EFSB 1-3

Request:

Did the applicant consider the potential impact of electromagnetic fields in the residential area? If so, please provide the analyses. If not considered, why not?

Response:

Yes, the applicant considered the potential impact of electric and magnetic fields across the Project including in this residential area. The proposed installation of the transmission line underground with optimized phasing of the cables in the duct bank serve to minimize exposure to electric and magnetic fields. As discussed in the Environmental Report at pp. 264-265, the transmission cables buried beneath Camp Avenue at depths of 3 to 6 feet will not be a source of an electric field above ground. The magnetic field at a distance of 25 feet from the center of the ductbank containing the cables on the side closest to the residences is calculated to be 4.1 milligauss (mG) at average loading, a value encompassing a typical range of background magnetic field levels (away from any appliances) in American homes (EPA, 1992).¹ At a distance of 50 feet the magnetic field is calculated to be still lower, 1.8 mG or less. The closest residence, 613 Camp Avenue, is 55 feet away from the proposed transmission cable duct bank. Overall residences along Camp Avenue and Windward Walk are between 55 feet and 177 feet away from the duct bank.

¹ United States Environmental Protection Agency (USEPA). EMF in Your Environment: Magnetic Field Measurements of Everyday Electrical Devices. Report 402-R-92-008, December, 1992.

EFSB 1-4

Request:

Please explain the extent to which impacts on residences was or was not considered when the alternative cable routes were developed and the proposed route was selected.

Response:

Revolution Wind, LLC ("Revolution Wind") considered impacts to residences when it analyzed alternative onshore cable routes, leading to the selection of the proposed route in a public right of way (ROW).

Consistent with the Energy Facility Siting Act and other applicable statutes and regulations, Revolution Wind assessed the Project's potential effect on a range of environmental, cultural and societal resources including wetlands and wildlife habitats, rare species, archaeological sites and historic properties, transportation, economy, aesthetics and electric and magnetic fields ("EMF"). The results of these assessments are described in detail within the Environmental Report submitted to the EFSB and the Project's Construction and Operations Plan ("COP") submitted to the United States Bureau of Ocean Energy Management (BOEM). Revolution Wind used these results to refine the Project siting, including the use of a portion of Camp Avenue for the onshore cable route.

Revolution Wind also avoided environmental impacts by siting the cable within Camp Avenue. The proposed use of underground transmission installation along Camp Avenue eliminates any long-term aesthetic effects because the cables will not be visible. EMF analyses performed on behalf of Revolution Wind show that electric fields associated with the cables will not be detectable above ground. Analysis of magnetic fields associated with the cables revealed that magnetic fields at a distance of 25 feet from the center of the ductbank along the side of Camp Avenue closest to the residences is calculated to be 4.1 milligauss (mG) at average loading, which is typical of background magnetic field levels in American homes. Residences along the Camp Avenue segment of the cables are greater than 55 feet away. Cumulatively, these results demonstrate that the Onshore Transmission Cables will not have any impact on the proximate residences.

During construction of the cable ductbank within Camp Avenue, which is estimated to occur over three months construction duration there will be temporary lane closures and detours around the work zone. These activities will be planned in close coordination with the Town of North Kingstown, as a Street Opening permit will be required. As part of the Town's approval process, Revolution Wind will be required to prepare Traffic Management and Traffic Control Plans that will specify appropriate traffic controls including lane closures, detours, signage and police details, which will protect the public from ongoing construction activities and ensure that

impacts on traffic flow are minimized. Construction activities will be limited to the allowable work hours of between 7:00 a.m. and 6:00 p.m. on weekdays and 7:00 a.m. and 5:00 p.m. on Saturdays, consistent with Town Ordinances. Construction of the Onshore Transmission Cable will require the use of large excavating equipment, pavement saws, backhoes, and the like, which will generate construction-related noise. As described in the Environmental Report (RevWind Exhibit 1) and Revolution Wind's Pre-filed Testimony (RevWind Exhibit 3), construction sounds levels are compliant with the Town's Noise Ordinance. The anticipated sound levels will be in line with similar types of roadway and utility construction and maintenance. Effects of construction along Camp Avenue and Windward Walk will be short term and localized and will be mitigated by the observance of Town dictated construction hours and a Town approved Traffic Control Plan.

Additionally, Revolution Wind conducted outreach with residential abutters, including meetings and invitations to virtual open houses from 2019 through today. Revolution Wind will continue to work with the public to address concerns throughout construction of the Project. Throughout the United States, public ROWs are routinely utilized by public and private water, sewer, gas and electric utility providers as corridors to install, operate and maintain utility infrastructure. Siting utilities within these ROWs avoids direct impacts to private land owners that would otherwise be called upon to host said utilities within an easement granted to the utility provider. Similarly, utility siting within established ROWs also avoids direct impacts to sensitive environmental and cultural resources.

EFSB 1-5

Request:

At the public comment hearing, one commenter raised a question about the extent to which there would be a third-party monitor of the activities associated with road openings and restoration who could verify compliance with the approved plans. Please provide a response to this concern.

Response:

The design of the underground transmission cables in the Quonset Development Corporation and Town of North Kingstown roadways will be certified by a Professional Engineer licensed in the State of Rhode Island following all applicable codes and standards for roadway construction. The plans will be reviewed and approved by the roadway owners prior to construction. Video and photograph evidence of the before and after construction activities of the roadways will be available to the roadway owners. The civil construction contractor will be required to post a performance bond for the road project to ensure all final conditions of restoration are met. The Project will employ qualified construction management personnel and field inspectors to document the roadway construction meets the certified design requirements. Eversource, which is a 50/50 joint owner of the Project, has extensive experience with work in roadways. Eversource performs underground construction activities on a daily basis to support its electric, gas and water customers in New England, and has tens of thousands of miles of underground infrastructure in public roadways.

EFSB 1-6

Request:

At the public comment hearing, a representative of the Audubon Society expressed a series of concerns. Please provide a response after reviewing the transcript of public comment hearing. (If more time is needed beyond the specified due date in order to obtain and review the transcript, please provide as soon as reasonably possible after the transcript is obtained and reviewed.)

Response:

In the course of siting and designing the Project, Revolution Wind, LLC ("Revolution Wind") undertook assessments of environmental resources both onshore and offshore. These assessments, which were submitted to the United States Bureau of Ocean Energy Management ("BOEM") as part of the Project's Construction and Operations Plan (COP), form the basis for the analysis of environmental impacts associated with the portions of the Project within the EFSB's jurisdiction (Onshore Project Components and Revolution Wind Export Cable in Rhode Island state waters [RWEC-RI]). The COP can be viewed on BOEM's website: <https://www.boem.gov/Revolution-Wind>.

The Audubon Society's Public Hearing Statement dated September 22, 2021 references the need to provide a "transparent evaluation of the potential impacts to birds and bird habitat from the proposed onshore transmission routes, paying specific attention to the federally endangered Piping Plover that have nested near the proposed onshore landing site, as well as impacts to freshwater wetlands." The Project's landfall site and onshore route avoid impacts to birds and important bird habitat for several reasons. First, the Project's landfall at Quonset Point is sited in an area of densely developed industrial and commercial land uses, and the shoreline in this location is a concrete retaining wall supported by a stone rip rap revetment with a narrow margin of sandy beach that is exposed only at low tide. This landfall area is highly unlikely to support important bird habitat. Second, the Project will make its sea to shore transition utilizing Horizontal Directional Drilling ("HDD"), which allows the RWEC-RI to be installed well below the sea floor proximate to shore and well below the shoreline features. Third, from the landfall location, the proposed onshore transmission cable will be constructed within existing roadways and/or is co-located with other existing developments like parking lots and will be constructed entirely below ground such that there will be no habitat conversion and no impact to habitats used for birds or any other wildlife species. Revolution Wind also notes that its COP will be reviewed and evaluated by individuals having expertise in birds, bird habitat and freshwater wetlands, including the United States Fish and Wildlife Service ("USFWS") and the United States Environmental Protection Agency ("USEPA"). The Project's application to the Rhode

Island Coastal Resources Management Council (CRMC) also will be reviewed for avian impacts, such as to waterfowl.

As to concerns regarding the Piping Plover (*Charadrius melodus*), a federally endangered shorebird, specifically, Revolution Wind sited the Project in an area that is not known to support habitat for Piping Plover, which is a shore bird. There are also no known occurrences of Piping Plover at the Project's landfall. Piping plover nests on coastal beaches, sandflats at the ends of sand spits and barrier islands, gently sloped foredunes, sparsely vegetated dunes, and wash over areas cut into or between dunes. These features do not exist at the Project landfall location, thus suitable habitat for Piping Plover is not present. Lastly, Revolution Wind consulted with the USFWS Endangered Species Division New England Field Office regarding potential impacts to a new piping plover nesting area identified near the Quonset State Airport over a mile from the proposed landfall location. Between the landfall and the identified Piping Plover nesting site, there are many industrial and commercial businesses and facilities, including the referenced airport, the Rhode Island Army National Guard, Handles Unlimited, Toray Plastics America Inc. and Electric Boat Corporation. Taken together, the distance to the nearest known nesting area, along with the intervening development, which is likely to mask the temporary disturbances associated with Project activities at the landfall location, it is unlikely this known nesting location will be affected by the Project. In fact, USFWS concurred that "piping plovers are not likely to be affected by the project because of the distance between the project's construction area (for the cable landfall and associated structures) and the piping plovers."¹

As for the Onshore Substation ("OnSS"), it has been sited within a previously developed area known as the Camp Avenue Dump, and the Interconnection Facility ("ICF") has been sited within the adjacent parcel that is the location of the existing The Narragansett Electric Company ("TNEC") Davisville Substation and associated transmission facilities. Revolution Wind and TNEC performed a wetland delineation within these parcels to identify the boundaries of any freshwater wetlands present on-site. The early identification of four wetlands within the properties allowed Revolution Wind to design and site the OnSS and ICF such that direct impact to wetlands could be avoided, and where impact to wetlands could not be avoided, to minimize or mitigate potential impacts. The OnSS completely avoids impact to the wetlands themselves and only has some limited impacts to the buffer of the wetlands. The ICF similarly avoids fill impact to wetlands and will require limited tree clearing within wetland and wetland buffer, which Revolution Wind has minimized, to construct the associated overhead transmission interconnection into the Davisville Substation. Revolution Wind has proposed to mitigate for these clearing impacts at the ICF through: (1) a planting program aimed at quickly restoring shrub habitat around the vernal pool, which vernal pool will not be disturbed; (2) placement of brush piles within the TNEC transmission right of way to provide cover habitat for small mammals and amphibians; and (3) a vegetation management approach that encourages the

¹ Personal communication. Susi von Oettingen USFWS Endangered Species Biologist, June 30, 2021.

establishment of meadow and shrubland habitat. As described in Revolution Wind's Pre-Filed Testimony (Applicant Exhibit 4), shrubland habitats are on the decline in New England and transmission line rights of way provide a consistent source of these critical habitats. Lastly, the effects of the Project on freshwater wetlands and coastal areas will be the subject of CRMC's review of the Project's applications under the Coastal Resources Management Program and the Rules and Regulations Governing the Protection and Management of Freshwater Wetlands in the Vicinity of the Coast.

Revolution Wind also notes that it performed an assessment of wildlife habitats which focused on species of greatest conservation need ("SGCN") identified in the Rhode Island Wildlife Action Plan ("WAP") (RIDEM et al. 2015). As part of this assessment, Revolution Wind consulted with the Rhode Island Natural Heritage Program ("RINHP"), which was established in 1979 to catalogue the State's rare flora and fauna (RIDEM et al., 2015). The RINHP has since been re-configured as a joint project between the Rhode Island Department of Environmental Management's ("RIDEM") Division of Fish and Wildlife ("DFW"), the University of Rhode Island ("URI"), The Nature Conservancy ("TNC"), and The Rhode Island Natural History Survey ("RINHS").

To assess if any federal or state-listed rare, threatened or endangered ("RTE") or SGCN species were present within the Project Area, Vanasse Hangen Brustlin, Inc., on behalf of Revolution Wind, evaluated information from the USFWS Information for Planning and Consultation ("IPaC") tool and the RIDEM Environmental Resource Mapper. Additionally, special attention was paid during the biological reconnaissance and wetland delineation field visits to identify occurrences of rare plants. General wildlife records were based on observations made during site investigations in July, August, and September 2019, March and July 2020, April and May 2021, the review of the RI WAP for species tied to specific Key Habitats within the Project Area, and other pertinent literature.

During the referenced field surveys, Project scientists observed three bird species and one amphibian species from the RI WAP's list of Rhode Island SGCN, though the Project scientists noted that the habitat types present within the Project Area have the potential to host other RI SGCN species that were not observed. No state or federally listed threatened or endangered fauna species were observed. One plant that is listed as a state species of concern was documented within the project limits of the OnSS but will be avoided by the Project. Revolution Wind's COP documents the potential impacts of land disturbance and habitat alteration from the Project on birds and other wildlife and notes that activities related to vegetative clearing and other construction activities may lead to temporary displacement and avoidance behavior of wildlife. However, these impacts are considered indirect and short-term, with wildlife usage expected to resume once the construction period has been completed. Revolution Wind is committed to minimizing construction impacts on these observed and potentially present SGCN species. To the extent possible, tree clearing needed for construction will occur before May 1st

and after August 15th of any given calendar year. When clearing must be scheduled between May 1st and August 15th, then the area to be cleared will be surveyed by a qualified biologist to determine if breeding birds and/or bats occur within the areas targeted for shrub and tree removal. These proposed conservation measures were developed with consideration for applicable state and federal guidelines for endangered species protection.

In summary, Revolution Wind conducted a series of baseline surveys, assessments and consultation with regulatory agencies over a two year period that informed the siting and design of the proposed Project facilities. These efforts resulted in the avoidance and minimization measures that reduced the Project's potential impacts and are the result of the careful and responsible siting of the Project. Consequently, monitoring and compensatory mitigation are neither necessary nor part of a regulatory program applicable to the Project.

Revolution Wind, LLC Application to Construct a Major Energy Facility
EFSB Docket No. SB-2021-01
Revolution Wind, LLC's
Response to the Energy Facility Siting Board's Data Requests, Set 1
Issued on September 23, 2021

EFSB 1-7

Request:

Please update the status of all pending applications.

Response:

The status of the pending applications is set forth below:

AGENCY	PERMITS/AUTHORIZATIONS	STATUS
Bureau of Ocean Energy Management ("BOEM")	Record of Decision/Construction and Operations Plan ("COP") Approval	In Review
RI Coastal Resources Management Council ("CRMC")	Federal Consistency Certification	In Review
	Category B Assent	In Review
	Freshwater Wetlands Permit	In Review
Rhode Island Department of Environmental Management ("RIDEM")	Water Quality Certification/Dredge Permit	In Review
	Rhode Island Pollutant Discharge Elimination System ("RIPDES") General Permit for Stormwater Discharge Associated with Construction Activity	In Review
The Town of North Kingstown	Street opening permits	Not yet submitted
	Use and Occupancy Rights	In Review
United States Coast Guard	Private Aids to Navigation Permit	Not yet submitted
United States Environmental Protection Agency	Outer Continental Shelf Air Permit	Not yet submitted
United States Army Corps of Engineers	Clean Water Act Section 10/Section 404 Permit	Not yet submitted
Federal Aviation Administration	Determination of No Hazard to Air Navigation	Wind Turbines/Offshore Substations – In Review
		Onshore Facilities – Not yet submitted

Revolution Wind, LLC Application to Construct a Major Energy Facility
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AGENCY	PERMITS/AUTHORIZATIONS	STATUS
National Oceanic and Atmospheric Administration National Marine Fisheries Service	Incidental Take Authorization	Not yet submitted

Several previously identified permits with Quonset Development Corporation ("QDC") and Town of North Kingstown were removed from this list because they are not required approvals, but rather have been addressed through the Advisory Opinions submitted in this docket. The Project federal permitting timeline is available on the dashboard at the following link:
<https://www.permits.performance.gov/permitting-project/revolution-wind-farm-project>