



Responsible Offshore Development Alliance

November 16, 2018

Grover Fugate, Executive Director
RI Coastal Resources Management Council
Stedman Government Center, Suite 3
4808 Tower Hill Road
Wakefield, RI 02879-1900

Re: Vineyard Wind Submission to CRMC [File No. 2018-04-055]

Dear Mr. Fugate,

The Board of Directors of the Responsible Offshore Development Alliance (RODA) today approved the following statement regarding Vineyard Wind's "Submission to CRMC regarding East-West Layout and Proposed Alternative" of November 9, 2018:

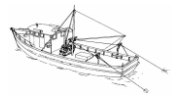
Regardless of the orientation, the construction and operation of a wind energy facility will have significant short- and long-term impacts to any vessels that may continue to operate within the array, those that are entirely displaced, vessel operators in adjacent areas that become impacted by these displaced vessels, and fishery stocks and ecosystems themselves. These impacts cannot be solely mitigated by changes in the orientation and will require further mitigation, including substantial compensation for short- and long-term losses, both within the array and in the abutting areas.

Moreover, although only two states are performing Coastal Zone Management Act consistency reviews regarding these large Northeast lease areas, fishermen and fishing businesses with homeports in other states will also be impacted. Such impacts, and the avoidance, mitigation, and compensation for those impacts, must be assessed and approached on a regional basis.

To the extent to which certain vessels and gear types choose to fish within wind energy arrays that may be built in federal waters offshore Massachusetts and Rhode Island, an East-West turbine orientation may slightly lessen (but not eliminate) impacts to those operators. RODA therefore supports such an orientation for each of these lease sites and requests that there is reasonable layout continuity among the sites. However, the spacing between turbines is likely to be more indicative of impacts to fishing activity than the orientation



Navigating Together into the Future



Executive Director: Anne Hawkins

Chairman: Peter Hughes

Treasurer: Eric Reid

For Information, Contact Annie@RodaFisheries.org



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itself. *Even with an E-W orientation* there remain a substantial number of fishing industry professionals who will not be capable of safely operating their vessels and gears in any wind energy array if turbines are separated by only one nautical mile.

RODA and its member organizations thank you for your consideration of this matter. Please do not hesitate to contact me with any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Annie Hawkins", is written over a light blue horizontal line.

Annie Hawkins, Executive Director
Responsible Offshore Development Alliance