



February 14, 2022

Doreen M. Harris, CEO  
New York State Energy Research and Development Authority  
Via email

Re: Offshore Wind Cable Corridor Constraints Assessment Framework (RFI 4944)

Dear Ms. Harris:

Thank you for the opportunity to comment on the request for information referenced above. As a Department whose responsibilities include both energy and the environment, many parts of DEEP are very interested in issues associated with offshore wind transmission cables in Connecticut's marine environment. As such, our comments and concerns are focused on the Long Island Sound Approach Area, described in Section 3.2 of the Assessment Framework.

While Long Island Sound is just one area discussed in the Assessment Framework, it is Connecticut's sole marine resource and a vital component of the state's natural heritage, economy, and quality of life. Its importance is reflected in the Long Island Sound Inventory and Blue Plan, a marine spatial plan adopted last year by the Connecticut legislature [Long Island Sound Blue Plan Home \(ct.gov\)](https://www.ct.gov/deep/longisland/). The Inventory compiles a variety of existing resource and use data for the entire Sound, and is not restricted to Connecticut waters: [LIS Resource and Use Inventory Home \(ct.gov\)](https://www.ct.gov/deep/longisland/). Contributors to the Inventory effort, including the members of the Ecological Experts group, could also be consulted for further input specific to the RFI. Perhaps most useful, there is an interactive map viewer that can be used to overlay appropriate elements of the compiled Blue Plan data to potential cable routes. [Blue Plan Viewer \(uconn.edu\)](https://www.ct.gov/deep/longisland/). Appendix 4 of the Plan also includes compatibility matrices for Ecologically Significant Areas (ESAs), such as the pockets of hard bottom/complex seafloor and cold water corals around Fishers Island, and Significant Human Use Areas (SHUAs), such as commercial fishing areas and vessel traffic areas, located along potential cable routes.

As you know, Connecticut as well as New York has adopted ambitious wind energy procurement goals and will be relying on offshore wind to help meet the state's decarbonization targets. We therefore fully recognize the imperative need to deliver OSW-generated electricity to both our states in a manner that is both sufficient to meet current and future renewable energy demands and efficient in transmitting the electricity with a minimum of grid congestion and adverse impacts to resources and uses. Blue Plan policies will provide guidance to Connecticut decisionmakers in pursuing this goal and may be helpful in illuminating the NYSERDA process as well. In general, the policies would suggest a minimum number of cable routes to minimize multiple areas of impact, and to avoid hard bottom substrates, shellfish habitat and aquaculture areas. Moreover, cables, pipelines and cable/pipeline areas are recognized as a SHUA in the Plan, and Policy 5.8 specifies that "new facilities may be co-located within corridors, as appropriate to avoid impact to adjacent areas."

Accordingly, DEEP staff would be very interested in collaborating with NYSERDA and other New York authorities to establish common LIS cable corridors and transmission specifications, and to explore options to consolidate potential cable routes, thereby minimizing adverse impacts while accommodating future growth in transmission capacity. I look forward to working with you to ensure a sustainable energy future while preserving the resources and values of our shared estuary, which both states cherish.

Sincerely,



Katie S. Dykes  
Commissioner  
Department of Energy and  
Environmental Protection

KSD/db

Cc: Justin Davis, DEEP Fisheries  
Lauren Savidge, DEEP BETP  
Brian Thompson, DEEP LWRD  
Robert Snook, CT AAG