

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

Application of Sunrise Wind LLC for a Certificate of Environmental Compatibility and Public Need for the Construction of Up to 6.2 Miles (320 kilovolt [kV]) of Direct Current (DC) Submarine Export Cable from the New York State Territorial Waters Boundary to the Smith Point County Park on Fire Island in the Town of Brookhaven in Suffolk County and Up to 17.5 Miles (320 kV) of Onshore Transmission Cable from the Landfall at Fire Island to a New Onshore Converter Station in the Town of Brookhaven and Up to 1 Mile (138 kV) of Alternating Current (AC) Onshore Interconnection Cable Connecting to the Existing Holbrook Substation in the Town of Brookhaven in Suffolk County

Case 20-T-0617
Deficiency No. 3

**SUNRISE WIND LLC’s RESPONSE
TO THE MAY 20, 2021 DEFICIENCY NOTICE**

Deficiency No. 3

16 NYCRR §86.4(a)(1) requires the Applicant to provide a statement explaining consideration of “[a]ny alternative route(s).” The Deficiency Letter stated “[e]xhibit 3 should include a statement explaining what consideration was given to alternative crossing routes for the three waterway crossings (ICW, Carmans River, and Yaphank Creek), including the environmental impacts associated with each alternative. Please provide such a statement for each of the crossings.” Please provide a discussion of any alternative crossing routes for the Intracoastal Waterway (ICW) and Carmans River as well as any specific environmental impacts (i.e. HDD as proposed, routing beneath existing Smith Point Bridge, etc.) associated with each alternative crossing.

Sunrise Wind’s Response:

The following table lists alternative crossing routes that the Applicant considered for the ICW and Carmans River crossings and discusses their advantages and constraints, including specific environmental and other impacts associated with each alternative crossing.

Project Component	Advantages/Constraints Identified	
<p>Onshore Transmission Cable – ICW Crossing <i>* As described in Revised Exhibit 3, the Applicant selected Smith Point County Park as the landfall site based on its numerous technical and environmental benefits in addition to stakeholder input, and it was a fundamental component of the Project in the original bid proposal to NYSERDA and subsequent award. Based on selection of the Union Avenue Site for the OnCS–DC and Smith Point County Park for the landfall site, the Onshore Transmission Cable must cross the ICW.</i></p>		
1	HDD Crossing – West of Smith Point County Bridge	HDD crossing from Smith Point County Park to Smith Point Marina to the west of Smith Point County Bridge is advantageous as it avoids in-water activities and potential impacts to benthic habitats within the ICW as well as associated wetlands, and the work areas on either side of HDD will be primarily located within existing, paved parking lots or previously disturbed areas, thereby minimizing impacts to terrestrial habitats and recreational areas.
2	HDD Crossing – East of Smith Point County Bridge	HDD crossing from Smith Point County Park to Smith Point Road east of Smith Point County Bridge was excluded from further consideration as it would require numerous fiber-optic cable crossings, would have limited available workspace, and would result in impacts to sensitive resources (tidal marsh), and would be in proximity to residences.
3	Attachment to current Smith Point County Bridge	Attachment to existing bridge was excluded from further consideration because it is a drawbridge, is not adequate to structurally support cable attachment, and is scheduled to be replaced within the next few years.
4	Attachment to new Smith Point County Bridge	The Applicant initially evaluated the potential to attach to the bottom of the new bridge; however, the schedule for construction does not support such a co-location.
5	Blue Point Marina	Crossing the ICW from Smith Point County Park to the Blue Point Marina was excluded from further consideration as the length of the crossing would require trenching in lieu of HDD, resulting in greater environmental impacts to the ICW and Great South Bay.
<p>Onshore Transmission Cable – Carmans River Crossing <i>*As described in Revised Exhibit 3, all of the routes that the Applicant evaluated would cross Carmans River due to its north to south alignment and as a result of the selection of the landfall site as well as the Union Avenue Site for the OnCS-DS. Complete avoidance of Carmans River would require a significantly longer and more impactful route. However, with the Applicant’s recent route update to the LIE Service Road Route to utilize Francine Place, Revilo Avenue, and Victory Avenue, the crossing of Carmans River will occur north of Montauk Highway and Sunrise Highway, thereby avoiding the Wertheim National Wildlife Refuge (NWR). As discussed in Revised Exhibit 4, crossing the Carmans River along Victory Avenue will occur via HDD, thereby avoiding impacts to the Carmans River and associated resources.</i></p>		
1	LIE Service Road Route	Route advantageous because of location primarily within existing ROW, minimal presence of sensitive natural resources, limited presence of potential cultural resources, and limited residential impacts.
2	Montauk Highway Route	Route excluded from further consideration based on proximity to sensitive natural and cultural resources, including the Yaphank Creek and the NWR as well as proximity to residences and higher traffic volumes.