3.8.2.2 Alternative B: Impacts of the Proposed Action on Coastal Habitats and Fauna

3.8.2.2.1 Construction and Installation

Onshore Activities and Facilities

Climate change: Climate change would contribute to impacts on coastal habitats and fauna primarily according to existing global and regional climate trends. Although sources of GHG emissions contributing to regional and global climate change mostly occur outside the GAA for coastal habitats and fauna, these resources may be affected by climate change, sea level rise, more frequent and intense storms, and altered habitat. The Proposed Action could contribute to a long-term net decrease in GHG emissions. This difference may not be measurable but would help reduce climate change impacts. Although the impacts resulting from climate change on coastal habitats and fauna are uncertain, BOEM anticipates that the Proposed Action would have no measurable influence on climate change and therefore the resulting impacts to coastal habitats and fauna would be **negligible** adverse.

Presence of structures: The OnSS would occupy an operational footprint measuring up to 3.8 acres and would connect to the ICF with two 115-kV underground transmission cables up to 527 feet long. Additionally, the OnSS would include a compacted gravel driveway, stormwater management features, and associated landscaped or managed vegetated areas totaling up to 7.1 acres inclusive of the up-to-4-acre operational footprint of the facility. The adjacent ICF would have an operational footprint of 1.6 acres and would also include a paved access road, stormwater management features, and associated landscaped or managed vegetated areas within the approximate 4.0-acre construction footprint. Construction of these facilities would result in habitat loss and habitat conversion in the areas surrounding the RWEC, the OnSS, and the ICF. The operational footprints of the OnSS and ICF would create habitat loss when forested upland is cleared and replaced with hard structures and crushed gravel yards that are not capable of supporting plants or wildlife. The ICF would result in a loss of approximately 1.6 acres of mixed oak/white pine forest, which is reflective of the operational footprint of the ICF. The OnSS would result in a loss of 3.8 acres of mixed oak/white pine forest. Together, these losses represent a relatively small fraction of the 52 acres of contiguous habitat identified in the RIWAP (vhb 2021) and represent a **negligible** to **minor** adverse impact to coastal habitats.

In addition to impacts on the mixed oak and white pine forest, the OnSS would develop 0.6 acre of pitch pine barren. The OnSS has been designed to avoid occurrences of sickle-leaved golden aster (*Pityopsis falcata*), a plant species of state concern within Rhode Island that were observed within the pitch pine barren outside of the footprint of the OnSS (vhb 2021). In accordance with the state environmental permitting needed for the Project, the occurrence of this state-listed species must be reported to the Rhode Island DEM, which will advise if a mitigation plan will be needed. Overall, the habitat loss that would result from the construction of the OnSS and ICF would be considered negligible because this loss would be small relative to the unimpacted similar habitat in the general region. As previously described in the impacts discussion for the landfall work area, land disturbance and habitat alteration from the construction of the OnSS and ICF could cause habitat degradation through the spread of invasive species. As noted previously, invasive plant growth within the OnSS parcels is pervasive. Invasive plant species were also observed throughout the forested portion of the ICF parcel (vhb 2021). This observation indicates that invasive species are likely to become further established in these areas if proper management techniques are not followed.

3.8.2.2.2 Operations and Maintenance and Decommissioning

Onshore Activities and Facilities

Climate change: No additional impacts from climate change beyond those discussed under the impacts analysis for construction and installation described in Section 3.8.2.2.1 are expected during O&M and Project decommissioning. BOEM anticipates that the Proposed Action would have no measurable influence on climate change and therefore the resulting impacts to coastal habitats and fauna would be **negligible** adverse.

Presence of structures: At the OnSS and ICF, land disturbance in the form of vegetation management would occur on a periodic basis to maintain vegetation at shrub height. Vegetation control methods would employ integrated vegetation management practices, including manual cutting, mowing, the prescriptive use of herbicides, and the use of environmental and cultural controls (Eversource 2018). The method of control would be determined following inspections of the site scheduled for maintenance. The current maintenance cycle for vegetation control using integrated vegetation management practices is 3 or 4 years depending on the vegetation composition, facilities, and site conditions (Eversource 2018). Hazard tree removal would also be performed on a cyclical basis to inspect and remove trees that may fall that are outside the edge of maintained ROWs. Presence of structures as it relates to vegetation clearing may result in the direct injury or mortality of wildlife as well as habitat alteration or removal. Impacts from vegetation management may include reduction in habitat quality via the spread of invasive species and temporary displacement of individuals. However, the spread of invasive species would be controlled with periodic vegetation management, and wildlife displacement could occur only during vegetation removal activities. The impact of habitat degradation and wildlife displacement resulting from vegetation management of the OnSS and ICF is expected to be short term **negligible** adverse.

At the end of the Project's operational life, the OnSS and ICF would be decommissioned in accordance with a detailed Project decommissioning plan that would be developed at that time. OnSS and ICF equipment may be removed while keeping the substation yard and fencing intact. Under such a scenario, land disturbance and habitat alteration activities may be similar to those described under the construction impact analysis, although the impacts would likely be less because new vegetation clearing and grading would not be necessary. The impact of habitat degradation and/or loss, wildlife displacement, and wildlife injury and/or mortality resulting from land disturbance during decommissioning of the OnSS and ICF would be short term **negligible** adverse.

3.8.2.2.3 Cumulative Impacts

Onshore Activities and Facilities

Climate change: The types of cumulative impacts from global climate change to coastal habitats and fauna described under the No Action Alternative would occur under the Proposed Action. However, the Project could also contribute to a long-term net decrease in GHG emissions. This difference may not be measurable but would help reduce climate change impacts (although effects would still be **negligible** to **minor** adverse).

Presence of structures: Construction and installation, O&M, and decommissioning of the OnSS under the Proposed Action would contribute to the habitat conversion and habitat loss described under the No Action Alternative, potentially changing the composition and abundance of faunal assemblages through