



VIA Electronic Mail

May 10, 2021 Revision (Original Submitted March 25, 2021)

Jolie Harrison, Chief
Permits and Conservation Division
Office of Protected Resources
National Marine Fisheries Service
1315 East-West Highway
Silver Spring, MD 20910

Re: Revised Request for Renewal for the Incidental Harassment Authorization (IHA)
Issued to Vineyard Wind, LLC

Dear Ms. Harrison,

Vineyard Wind, LLC (Vineyard Wind) received an Incidental Harassment Authorization (IHA) from the NOAA Fisheries' Office of Protected Resources, permitting the incidental harassment of small numbers of marine mammals resulting from high resolution geophysical (HRG) surveys in support of offshore wind development projects in Federal and State waters. The IHA permitted HRG survey efforts are within Bureau of Ocean Energy Management (BOEM) Lease area OCS-A 0501, Lease Area OCS-A 0522, and potential offshore export cable corridor (OECC) routes. As described below, Vineyard Wind requests a renewal of the IHA to continue the specified work in the southern portion of OCS-A 0501 and OCS-A 0522 and potential OECC routes. A separate IHA application has been submitted by Vineyard Wind 1 LLC for work in the northern portion of OCS-A 0501 where the Vineyard Wind 1 project will be located.

Due to weather and other delays, Vineyard Wind did not complete the entire HRG survey program that was proposed in the existing IHA that will expire on June 20, 2021. Therefore, Vineyard Wind is formally requesting a renewal of the IHA, authorizing work between June 21, 2021 to June 20, 2022, in accordance with the language in the Federal Register notice that allows National Marine Fisheries Service (NMFS) to issue a one-year renewal when 1) up to another year of identical or nearly identical activities as described in the Specified Activities section is planned, or 2) the activities would not be completed by the time the IHA expires and a second IHA would allow for the completion of the activities beyond that described in the Dates and Duration section, provided all of the following conditions are met:

- A request for renewal is received no later than 60 days prior to the expiration of the current IHA.

The initial renewal request was submitted to NMFS on March 25, 2021. Eighty-seven (87) days prior to the IHA expiration.

- The request for renewal must include the following:
 - (1) An explanation that the activities to be conducted beyond the initial dates either are identical to the previously analyzed activities or include changes so minor (e.g., reduction in pile size) that the changes do not affect the previous analyses, take estimates, or mitigation and monitoring requirements.

HRG activities to be conducted under this renewal are identical (same equipment) to the activities proposed in the 2020 HRG IHA application, however, the amount of work proposed under this renewal is a subset of the initial request in order to complete the work authorized in the IHA, dated June 18, 2020. Vineyard Wind conducted 184 vessel days (~18,000 km) of survey under the approved IHA and therefore, 552 vessel days (55,200 km) remain for purposes of the renewal.

- (2) A preliminary monitoring report showing the results of the required monitoring to date and an explanation showing that the monitoring results do not indicate impacts of a scale or nature not previously analyzed or authorized.

A draft preliminary monitoring report from the 2020 survey campaign was submitted electronically to NMFS on March 24, 2021. An updated preliminary monitoring report was submitted electronically to NMFS on May 10, 2021. A summary of the adjusted takes requested are provided below.

Table 1. Total Authorized Level B Harassment Takes and the Adjusted Number of Requested Level B Harassment Takes for the Renewal Period

Species of interest (common name)	Authorized Takes by Level B Harassment 2020 IHA	Requested Takes by Level B Harassment Renewal
Fin whale*	67	51
Humpback whale	46	34
Minke whale	41	31
North Atlantic right whale*	10	8
Sei whale*	4	3
Atlantic white sided dolphin	1011	758
Bottlenose dolphin	815	611
Pilot whales†	142	107
Risso's dolphin	6	6‡
Common dolphin	2036	1527
Sperm whale*	4	3
Harbor porpoise	1045	784
Gray seal	4044	3033
Harbor seal	4044	3033

* Listed as Endangered under the ESA.

† Long- and short-finned pilot whales are grouped together.

‡ The number of authorized Level B harassment takes for this species was adjusted to the mean group size.

Vineyard Wind will comply with the mitigation and monitoring measures as authorized in the existing IHA for the renewed HRG survey program. If you have any questions or concerns regarding this request, please do not hesitate to contact Elizabeth Hansel at ehansel@vineyardwind.com or Matthew Robertson at mrobertson@vineyardwind.com.

Sincerely,



Matthew Robertson
 Director, Environmental Affairs
 Vineyard Wind, LLC