



**Andrew Gottlieb**  
*Executive Director*

April 24, 2018

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Energy Facilities Siting Board  
One South Station  
Boston, MA 02110

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RE: Vineyard Wind LLC, EFSB 17-05/D.P.U. 18-18/18-19

**Maureen O'Shea**  
*Clerk*

Dear Ms. Sedor:

**Robert Ciolek**

**Michael Corrigan**

The Association to Preserve Cape Cod (APCC), the Cape's leading nonprofit environmental advocacy and education organization, offers the following comments regarding the proposed Vineyard Wind LLC project (EFSB 17-05/D.P.U. 18-18/18-19).

**DeeDee Holt**

**Thomas Huettner**

**Pat Hughes**

**Cheryl Lubin**

**Blue Magruder**

**Eliza McClennen**

**Donald Palladino**

**Kris Ramsay**

APCC strongly supports the evolution of energy production away from fossil fuels and toward new development that utilizes clean and renewable sources of energy. Due to our geographic location, Cape Cod is particularly vulnerable to the impacts of climate change in the form of sea level rise, coastal erosion and an increase in the frequency and severity of coastal storms. Climate change represents a serious threat to Cape Cod's—and the rest of Massachusetts'—coastal communities, their natural resources and economy.

It is essential for the Commonwealth and our nation to develop widespread alternatives to the use of fossil fuels. Wind energy—and particularly the modern technological advances that now allow the development of deep water offshore wind energy—is one of the most viable sources of clean energy available to us.

Vineyard Wind, as one of three offshore wind energy projects proposed for waters off the Massachusetts coast, has the potential to provide a significant contribution to the future development of U.S. offshore wind energy production. According to information on the project filed by the applicant, the project would deliver up to approximately 800 megawatts of power to the New England energy grid. It has the potential to offset 1,680,000 tons per year of CO2 emissions, NOx emissions would be reduced by 1,030 tons per year and SO2 emissions would decrease by approximately 880 tons per year.

However, it is essential that this project undergo a rigorous and comprehensive state review to ensure that all potential environmental impacts and other issues associated with the construction and ongoing operation of the project are studied and adequately addressed.

For the project's filing of an Environmental Notification Form (ENF) through the Massachusetts Environmental Policy Act (MEPA) review process, APCC recommended

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in January 2018 that several issue areas undergo further study and that the applicant provide additional information about project impacts and proposed mitigation. APCC makes these same recommendations relevant to the Energy Facilities Siting Board review, as follows:

- The offshore component including proposed cable installation in state waters will take place in Land Containing Shellfish, fisheries habitat, Priority Habitat of Least Terns and Piping Plover, and habitat utilized by marine mammals. Information provided by the applicant in the ENF did not contain a discussion of potential impacts on habitat of sensitive and valuable species of shellfish, fish, invertebrates (e.g., clams, scallops, river herring, winter flounder, cod, lobster, horseshoe crab, etc.), birds and marine mammals that exist or occur within the project area. The applicant should study such potential impacts and propose measures to avoid, minimize or mitigate these potential impacts, such as appropriate time-of-year (TOY) restrictions, sediment and erosion control measures, and other measures. Maps of shellfish growing area and habitat of other species within the project area that are subject to TOY restrictions should also be included.
- Given that Lewis Bay has a Total Maximum Daily Load (TMDL) for nitrogen, the applicant should propose measures to avoid, minimize or mitigate potential water quality impacts and impacts on aquatic species due to resuspension of sediments and remobilization of nitrogen during offshore trenching and horizontal direct drilling. Documentation of the use of these measures using video monitoring or other means should be provided.
- Storm preparedness measures for the landing sites should be described by the applicant, to ensure that construction equipment and construction materials are secured and/or removed offsite during major storms or hurricanes. Loose or unsecured equipment and construction materials may cause storm damage to properties and resource areas.
- The applicant should provide proposed mitigation measures for Lewis Bay (the preferred cable route) that would offset any potential impacts from the project, including mitigation that could improve existing conditions in the bay. For example, there may be potential for mitigation that could improve Lewis Bay water quality by addressing stormwater runoff and/or nutrient loading.
- The project applicant should compare potential environmental impacts for each alternative land route for the underground cable. If the preferred alternative route has greater impacts to natural resources or to Article 97 lands, the applicant should demonstrate the preference for using this route compared to a route that would have less environmental impact.
- The applicant should describe proposed measures to prevent erosion and runoff into wetland areas and other sensitive habitats along the proposed onshore underground cable routes during the construction phase.
- In its ENF filing, the applicant stated that all of the proposed offshore cable routes, and a potential landfall site at Great Island, will require construction within priority habitat of rare species. In addition, the proposed onshore underground cable route will cross mapped

priority habitat areas, with the construction located beneath paved road surfaces or within ten feet of paved road surfaces. The applicant should provide information about the applicant's consultations with the Natural Heritage and Endangered Species Program regarding construction protocols and any proposed mitigation for potential impacts to rare species and their habitats.

- The applicant should clarify any potential changes in the jurisdiction of Article 97 lands that may be affected by the route of the onshore underground cable. Likewise, the applicant should address any proposed release or modification of a conservation restriction on land located along the Great Island Preferred Route Variant 4 if it is determined that this route will be used.
- In its ENF filing, the applicant stated that the preferred onshore underground cable route will cross a stream identified as Thornton Brook, either by installing a duct bank section for the cable above the existing culvert, or installing a duct bank section beneath the culvert. The applicant should provide further description of how the cable will cross this stream without impacting the wetland resource.
- The preferred route for the onshore underground cable runs along an abandoned section of Higgins Crowell Road that has been identified as the route for a proposed bike path. This abandoned section of Higgins Crowell Road also appears to run through a Zone I for a public water supply well. The applicant should examine how construction of the underground cable could impact the Zone I and what measures are proposed to protect the water supply.
- The project's proposed onshore substation site is located in a Ground Water Protection Overlay District, with a portion of the site also located in a Wellhead Protection Overlay District. The applicant should explain how the project will avoid impacts to groundwater resources from potential equipment fluid leaks at the substation, including a detailed description of proposed spill containment and response measures.

APCC thanks the Energy Facilities Siting Board for this opportunity to provide comments.

Sincerely,



Andrew Gottlieb  
Executive Director