



Andrew Gottlieb
Executive Director

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Dr. Walter Cruickshank, Acting Director
Bureau of Ocean Energy Management
Attention: Program Manager, Office of Renewable Energy
45600 Woodland Road
Sterling, VA 20166

**RE: Supplement to the Draft Environmental Impact Statement: Vineyard Wind
Offshore Wind Energy Project Construction and Operation Plan
(Docket ID: BOEM-2020-0005)**

Dear Dr. Cruickshank:

John Cumbler

Margo Fenn

DeeDee Holt

Thomas Huettner

The Association to Preserve Cape Cod (APCC) has reviewed the Supplement to the Draft Environmental Impact Statement (SEIS) for the Vineyard Wind Offshore Wind Energy Project Construction and Operation Plan and provides the following comments in support of the Vineyard Wind project.

Pat Hughes

Steven Koppel

Cheryl Lubin

Founded in 1968, APCC is the leading nonprofit environmental advocacy and education organization for the Cape Cod, Massachusetts region. APCC works for the adoption of laws, policies and programs that preserve, protect and enhance Cape Cod's natural resources and quality of life.

Elysse Magnotto-Cleary

Blue Magruder

Eliza McClellan

Stephen Mealy

Kris Ramsay

On December 19, 2018, APCC issued a public statement endorsing the Vineyard Wind project, becoming the first nonprofit environmental organization in the nation to do so. The decision to support the project followed comprehensive review by APCC of the project's multiple state regulatory filings through the Massachusetts Environmental Policy Act (MEPA) process, as well as the release of the Bureau of Ocean Energy Management's Draft Environmental Impact Statement for the project.

Robert Summersgill

Taryn Wilson

The additional analysis provided by BOEM in the SEIS is thorough and well thought-out, including a detailed study of the potential impacts of a "reasonably foreseeable" scenario for offshore wind development along the east coast within the next decade, based on an assumption of future offshore wind energy generation of more than 25 times the size of the Vineyard Wind 1 project.

APCC believes the information provided in the SEIS supports development of the offshore wind industry, including the Vineyard Wind project, and the much-needed

clean renewable energy it will provide. We also believe the analysis points to the proposed 1 x 1 nautical mile (NM) turbine layout without transit lanes (Alternative D2) as the alternative for the Vineyard Wind project having the least impact and most benefits. APCC is very concerned that inclusion of six four-mile-wide transit lanes through the greater offshore wind lease area, as proposed by the Responsible Offshore Development Alliance, would significantly reduce overall wind energy production capacity and result in the failure of regional states to meet their clean energy production goals.

After a very long and careful analysis by BOEM, the U.S. Coast Guard and others, the 1 x 1 NM layout without transit lanes stands out as the reasonable compromise. It allows for coexistence between the new offshore wind industry and existing marine uses, such as the commercial fishing industry, while protecting the marine environment and setting a path forward for clean energy production.

APCC recognizes that any large-scale project will inevitably have some impacts, and Vineyard Wind is no exception. However, the SEIS makes clear that for nearly every resource of concern reviewed, such as fishing, endangered species, habitats, coastlines and cultural resources, climate change is identified as the major threat producing some of the greatest impacts. In the Northeast at a minimum, climate change impacts from warming waters and ocean acidification will do more to disrupt the fishing industry than the development of offshore wind. Geographical shifts in fish and lobster populations to cooler waters are already documented. The SEIS concludes that, if not addressed, climate change will have significant adverse impacts on fisheries, marine mammals and avian species and contribute or lead to “permanent changes of unknown intensity” to these resources. APCC agrees with BOEM’s analysis.

Offshore wind is a high capacity, domestic renewable energy resource that will improve energy security and reliability by reducing reliance on fossil fuels and supporting the transition to a renewable energy grid. The rapid deployment of offshore wind is essential to achieve state and regional greenhouse gas emission reduction targets and limit the worst impacts of climate change. Vineyard Wind will launch the offshore wind industry in the U.S. and provide clean, renewable electricity to 400,000 homes and businesses in Massachusetts. APCC therefore urges BOEM to move forward with no further delays in the Vineyard Wind EIS process, with Alternative D2 and the Covell’s Beach landing as the selected alternatives.

Thank you for this opportunity to provide comments.

Sincerely,



Andrew Gottlieb
Executive Director



Don Keeran
Assistant Director