



Andrew Gottlieb
Executive Director

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Kathleen Theoharides, Secretary
Executive Office of Energy and Environmental Affairs
Attention: MEPA Office, Alex Strycky
100 Cambridge St., Suite 900
Boston, MA 02114

RE: Vineyard Wind Connector 2 Draft Environmental Impact Report, EEA #16231

Dear Secretary Theoharides:

The Association to Preserve Cape Cod (APCC) has reviewed the Vineyard Wind Connector 2 Draft Environmental Impact Report (DEIR) and submits the following comments.

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

APCC applauds the Vineyard Wind Connector 2 project's stated purpose to provide utility-scale renewable energy that, according to the DEIR, will result in an annual reduction of 1.59 million tons of CO2 emissions in New England, the equivalent of removing 320,000 new cars from the road. Nitrogen oxides are expected to decrease across New England by 850 tons per year and sulfur dioxide by 450 tons per year. Offshore wind 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 the Commonwealth's and the Northeast region's greenhouse gas emission reduction targets and limit the worst impacts of climate change.

The project benefits described above match those of the Vineyard Wind 1 project, which was recently approved by the Bureau of Ocean Energy Management (BOEM). On December 19, 2018, APCC issued a public statement endorsing the Vineyard Wind 1 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 process, as well as the release of BOEM's Draft Environmental Impact Statement for the project.

APCC's review of the Vineyard Wind Connector 2 DEIR draws from the analysis conducted and conclusions reached by APCC for Vineyard Wind 1. Given the similarities between Vineyard 1 and Vineyard Wind Connector 2 in proposed offshore and onshore routing, construction, operation, best management practices, monitoring, mitigation and other aspects of the project, including minimizing potential impacts to rare species, APCC does not see the likely potential for concern about additional environmental impacts, or the project's ability to properly mitigate any impacts that may occur. The project will continue with, and expand on, the first Vineyard Wind project's approved best management practices, monitoring and research, and investment mitigation aimed at protecting marine species—especially marine mammal species—and avian and bat species from offshore wind impacts.

The Vineyard Wind Connector 2 preferred alternative for the proposed offshore and onshore routes appears to provide the least potential impact to environmental resources. APCC supports the applicant's preferred route for the onshore cables, but does not support the identified variants that would impact Article 97 lands, wetlands or rare species habitat. (APCC acknowledges the unavoidable project work proposed for wetlands, rare species habitat and Article 97 lands at the proposed Craigville Public Beach onshore landing site or the alternative Covell's Beach site, which is not likely to adversely affect natural resources at either location.)

In reviewing the DEIR, APCC notes there are still some aspects of the project that have not yet been finalized or clarified, such as:

- The specific details of an Oil Spill Response Plan for offshore refueling of construction vessels.
- The choice of a method for crossing the Centerville River. The project applicant should provide further clarification on plans to avoid any impacts to wetlands or wetland buffers at this location. More study should be done on the feasibility of the techniques being considered and the preferred method chosen, with the primary objective being protection of wetland resources.
- A finalized Spill Prevention, Control and Countermeasures Plan for the substation site. The DEIR states that the site design is intended to contain 110 percent of the dielectric fluid at the site, plus an additional 30 inches of storage to contain rainfall for extreme events. APCC's expectation is that the spill prevention plan will be similar to, and as

effective as, the plan developed for the Vineyard Wind 1 substation. Since the proposed substation site is located in a Zone II, it is critically important that the quality of groundwater be protected from potential contamination.

- A stormwater pollution prevention plan for construction activity along the onshore cable route.
- Continued coordination with the Natural Heritage and Endangered Species Program for avoiding, minimizing and mitigating potential impacts to rare species habitat, including but not limited to finalization of a Piping Plover Protection Plan.
- Other appropriate mitigation for any land clearing at the substation or other sites along the onshore cable route. This mitigation should be finalized in the Cape Cod Commission's Development of Regional Impact review process.

APCC looks forward to reviewing additional information on the above issues in the subsequent EIR submission and in the Cape Cod Commission regulatory review process for the project.

Finally, APCC commends Vineyard Wind for pursuing discussions with the town of Barnstable about laying the project's land-based cables in coordination with Barnstable's planned sewer installation along the same route. As described in the DEIR, doing so would minimize construction disruptions along the route and save the town money. Most important, the end result will reduce wastewater impacts on water resources, including impacts to Wequaquet Lake—another significant project benefit in addition to the clean energy the project will provide.

APCC thanks the Secretary for this opportunity to provide comments.

Sincerely,



Andrew Gottlieb
Executive Director