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Executive Director

July 30, 2021

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Amanda Lefton, Director  
Bureau of Ocean Energy Management  
Attention: Office of Renewable Energy  
45600 Woodland Road  
Sterling, VA 20166

**RE: BOEM-2021-0047 – Vineyard Wind South Notice of Intent (NOI) to Prepare an Environmental Impact Statement**

Dear Director Lefton:

The Association to Preserve Cape Cod (APCC) has reviewed the Vineyard Wind South Notice of Intent to prepare an Environmental Impact Statement published by the Bureau of Ocean Energy Management 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 South project's stated purpose to provide utility-scale clean, renewable energy that will be developed in two phases, with Phase 1, also known as the 804 MW Park City Wind project, and the 1,200 to 1,500 MW Phase 2. Vineyard Wind South is expected to reduce carbon dioxide equivalent emissions by approximately 3.95 million tons per year, which is the equivalent of removing 780,000 automobiles from the road.

Offshore wind projects such as Vineyard Wind South will improve energy security and reliability by reducing reliance on fossil fuels and support the transition to a renewable energy grid. The rapid deployment of offshore wind is essential to achieve Massachusetts' and the Northeast region's greenhouse gas emission reduction targets and limit the worst impacts of climate change. The Vineyard Wind South project benefits described above complement those of the Vineyard Wind 1 project, which was recently approved by 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 as well as the release of BOEM's Draft Environmental Impact Statement for the project. APCC's initial review of the Vineyard Wind South project draws from the analysis conducted and conclusions reached by APCC for Vineyard Wind 1. Given the similarities between Vineyard 1 and Vineyard Wind South in proposed offshore and onshore routing practices, 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 Vineyard Wind 1 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.

As the Vineyard Wind South Phase 1 regulatory process moves forward, APCC will continue to review aspects of the project relevant to our organization's mission to protect Cape Cod's environment and natural resources. For example, APCC supports the applicant's stated 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.)

APCC looks forward to reviewing additional information on specific project details for Phase 1 of Vineyard Wind South relevant to Cape Cod that are yet to be finalized (and for Phase 2, when those project plans are made available in more detail), and which are subject to federal, state and/or regional regulatory jurisdiction, such as:

- The specific details of an Oil Spill Response Plan for offshore refueling of construction vessels.
- The final choice of a method for crossing the Centerville River with the onshore cable, with the primary objective being protection of wetland resources.
- A finalized Spill Prevention, Control and Countermeasures Plan for the substation site. 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 groundwater be protected from potential contamination.
- A stormwater pollution prevention plan for construction activity along the onshore cable route.



- Continued coordination with federal and state agencies for the purposes of avoiding, minimizing and mitigating potential impacts to offshore and onshore rare species habitat.
- 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.)

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. 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 BOEM for this opportunity to provide comments.

Sincerely,



Andrew Gottlieb  
Executive Director