



November 18, 2021

Andrew Gottlieb
Executive Director

Amanda Lefton, Director
U.S. Bureau of Ocean Energy Management
Attention: Program Manager
Office of Renewable Energy
45600 Woodland Road (VAM-OREP)
Sterling, VA 20166

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RE: Mayflower Wind Offshore Wind Energy Project COP EIS

Dear Director Lefton:

The Association to Preserve Cape Cod (APCC) submits the following comments on the Notice of Intent to prepare an Environmental Impact Statement (EIS) for the Mayflower Wind Offshore Wind Energy Project.

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

There is a critical need to replace our nation's dependence of fossil fuels with clean, renewable energy from a variety of technology sources, and modern advancements in deep water offshore wind technology have positioned it to be one of the most viable sources for large-scale green energy production. According to the Mayflower Wind Construction and Operations Plan (COP), the project will generate 804 megawatts of clean offshore wind energy for Massachusetts. APCC strongly supports increased production of offshore wind energy to meet the region's and the nation's existing and future energy needs and to assist with the transition from fossil fuel use—the cause of our growing climate crisis—to clean energy sources. The Mayflower Wind project will be an important step forward in the effort to achieve our renewable energy goals.

In preparation of the EIS, APCC recommends that additional study and information be provided for the following issue areas, which specifically pertain to the natural

resources associated with the Cape Cod onshore and offshore aspects of the project.

Landing Sites

According to the COP, three locations in Falmouth have been identified as potential landing sites for the offshore cables: Worcester Avenue (preferred site), Central Park (alternate site) and Shore Street (alternate site). Horizontal directional drilling is proposed for each site to minimize impacts to the beach or existing infrastructure. Although the COP suggests that there is little potential for adverse environmental impacts from the project at these three sites, the EIS should confirm that no environmental impacts, or potential long term adverse public use impacts, will occur at the landing sites.

Onshore Cable Route

The COP reports that the onshore export cables in Falmouth will be installed underground within area roadway layouts or other disturbed areas, and that none of the cable routes will affect “substantial areas of natural habitat or vegetation communities.” APCC supports utilization of roadways and disturbed areas for the onshore routing in order to avoid impacts to greenspace and natural habitats. We would like to see further confirmation in the EIS that no greenspace will be cleared or otherwise affected in routing the onshore cable, with the possible exception of disturbance of roadside vegetation that does not impact sensitive habitat areas.

Substation

Two potential sites for the project substation are being considered in Falmouth. Mayflower Wind’s preferred location is the Lawrence Lynch site at 396 Gifford Street. The alternate location is the Cape Cod Aggregates site at 469 Thomas Landers Road. APCC commends the selection of two sites that appear, for the most part, to be previously disturbed. APCC looks forward to reviewing more information in the EIS process about the final selection of a substation site, particularly with regard to a stormwater management plan and a hazardous materials spill prevention and containment plan for the chosen site.

Marine Mammal and Turtle Protection

The COP included a proposed plan for marine mammal and turtle protection during project construction and operation. APCC looks to the EIS process for an analysis to determine whether Mayflower Wind’s proposed plan is consistent with federal standards and guidelines established for protecting marine mammals and turtles for offshore wind projects. APCC strongly encourages Mayflower Wind to officially adopt the best management practices and mitigation measures drafted in the agreement reached between Vineyard Wind and the Natural Resources Defense Council, National Wildlife Federation and Conservation Law Foundation for protection of the critically endangered North Atlantic right whale.



Avian and Bat Species Protection

The Mayflower Wind COP includes an avian exposure risk assessment designed to be in accordance with BOEM guidance. The COP also includes an assessment of bat species that may be exposed to potential impacts of offshore and onshore project construction and operation. APCC looks to the EIS process for more discussion about potential impacts to avian and bat species and actions that can be taken to avoid, minimize and mitigate potential project impacts, especially for at-risk species.

Conclusion

Mayflower Wind will play an important role in our nation's conversion to clean, renewable energy, and will help Massachusetts fulfill its commitment to achieving net-zero emissions by 2050. It is critically important that the project demonstrate its commitment to protecting marine and land-based environmental resources while also meeting its energy production objectives. APCC looks forward to reviewing more project details in the issue areas discussed above when the EIS is published by BOEM.

APCC thanks BOEM for this opportunity to provide comments.

Sincerely,



Andrew Gottlieb
Executive Director