



January 20, 2022

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Secretary Kathleen Theoharides
Executive Office of Energy and Environmental Affairs
MEPA Office

Attention: Alexander Strycky, MEPA Analyst
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: New England Wind 1 Connector Final Environmental Impact Report, EEA # 16231

Dear Secretary Theoharides:

The Association to Preserve Cape Cod (APCC) has reviewed the Final Environmental Impact Report (FEIR) for the New England Wind 1 Connector project 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.

The FEIR for the NE Wind 1 Connector describes the project, which comprises the state-jurisdictional elements of the Park City Wind project, as an 800-megawatt offshore wind energy project that will result in "an annual reduction of approximately 1.59 million tons of carbon dioxide-equivalent (CO₂e) emissions across New England, or the equivalent of removing approximately 310,000 new cars from the road." This project will play an important role in efforts by Massachusetts to meet its ambitious greenhouse gas emissions reduction targets, as required by the Global Warming Solutions Act. Once operational, it will significantly reduce reliance on fossil fuels in Massachusetts and across the New England region. Locally, it will improve the reliability of the energy supply on Cape Cod, with the added—and critically important—benefit of that energy being clean and renewable.

In comments submitted by APCC for the project's Draft Environmental Impact Report (DEIR), we identified several issue areas where we sought clarification or

additional information regarding offshore and onshore elements of the project relevant to Cape Cod's natural resources, including the Cape's surrounding marine environment. The project applicant responded to APCC's comments in the FEIR and, based on the applicant's responses, APCC believes that our questions have been adequately addressed. Specifically:

- *Information about an Oil Spill Response Plan for offshore refueling of construction vessels.* The Proponent is drafting an Oil Spill Response Plan consistent with federal requirements for Outer Continental Shelf Facilities, which will be finalized during the federal review process.
- *The preferred method for crossing the Centerville River.* The project applicant has identified a microtunnel as the preferred method of crossing the Centerville River, which would avoid any impacts to the river or the riverbank. Impacts to riverfront area and wetland buffer zone would be temporary, resulting in no permanent impacts.
- *A finalized Spill Prevention, Control and Countermeasures Plan for the substation site.* A Spill Prevention, Control and Countermeasures Plan for the substation site will be finalized during the project permitting process. However, the FEIR does include a detailed description of the proposed substation containment system, which appears to provide sufficient protection of groundwater from potential spills or stormwater runoff, with 110 percent containment capacity for substation dielectric fluid in addition to the capacity to accommodate stormwater from a Probable Maximum Precipitation event, defined as 30 inches of rain.
- *A stormwater pollution prevention plan for onshore construction activity.* Stormwater management and erosion and sediment control measures for construction activity along the onshore cable route were described in the DEIR. APCC assumes that any necessary alterations to the plan will be finalized during the permitting process.
- *Continued coordination with the Natural Heritage and Endangered Species Program for avoiding, minimizing and mitigating potential impacts to rare species habitat, including finalization of a Piping Plover Protection Plan.* The Piping Plover Protection Plan and time of year restrictions for construction activity in piping plover habitat areas were discussed in the FEIR. The FEIR also confirms that the project applicant continues to consult with the Natural Heritage and Endangered Species Program regarding avian protection and conservation measures related to the project. Although the FEIR states that no avian conservation measures are proposed specifically for the NE Wind 1 Connector portion of the project (as opposed to the full federally reviewed Park City Wind project), the project applicant expects continued discussions with NHESP about possible collaboration. APCC strongly encourages the project applicant and NHESP to determine an appropriate role for the state-jurisdictional NE Wind 1 Connector in avian and other rare species conservation

measures that could count as a project benefit.

- *Proposed mitigation for land clearing at the substation site.* The FEIR confirms that the project applicant will provide a mitigation proposal for land that will be cleared due to project construction, including for the construction of the substation, during the Cape Cod Commission Development of Regional Impact review process. APCC will review and comment on the proposed open space mitigation at that time.

APCC once again applauds the project applicant and the town of Barnstable for their collaboration on utilizing the installation of the onshore cables to at the same time install sewerage for wastewater treatment. APCC strongly encourages continued collaboration on this initiative. APCC also commends the town for dedicating the project applicant's host community agreement payment toward the town's water stabilization fund, which will be set aside for water infrastructure projects. According to the FEIR, the Vineyard Wind 1 collaboration resulted in an estimated \$3-4 million savings in sewer construction costs, and it is anticipated that similar savings will be achieved through the NE Wind 1 Connector collaboration.

APCC supports the applicant's plans to establish an Offshore Wind Protected Marine Species Mitigation Fund for research on best practices and new technologies to reduce potential sound impacts and collision threats from the development of offshore wind. APCC also welcomes the proposal by the applicant to develop a framework for a monitoring program in federal waters for avian and bat species for the post-construction phase of the Park City Wind project. APCC also supports the applicant's statement in the FEIR that, although it will be based on the framework established for Vineyard Wind 1, the avian and bat monitoring program will incorporate flexibility to accommodate "new technology and lessons learned."

The NE Wind 1 Connector project, as the Massachusetts jurisdictional portion of the Park City Wind project, is a critically important step forward in transitioning away from regional reliance on fossil fuels. We call on Massachusetts state, regional and local permitting authorities and the project applicant to continue to work together to ensure a rigorous, comprehensive and successful review of this project.

APCC thanks the Secretary for this opportunity to provide comments.

Sincerely,



Andrew Gottlieb
Executive Director