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January 27, 2022

Secretary Kathleen Theoharides
Executive Office of Energy and Environmental Affairs
MEPA Office
Attention: Erin Flaherty, MEPA Analyst
100 Cambridge Street, Suite 900
Boston, MA 02114

**RE: Mayflower Wind (Falmouth Connector) Environmental Notification Form, EEA
#16507**

Dear Secretary Theoharides:

The Association to Preserve Cape Cod (APCC) submits the following comments on the Mayflower Wind (Falmouth Connector) project Environmental Notification Form (ENF).

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 ENF, the project will be used to interconnect up to 1,200 megawatts of renewable energy to the New England power grid. It will eliminate over two million metric tons of greenhouse gas emissions annually, which the ENF describes as being the equivalent of reducing the emissions of more than five million vehicle miles driven each year. The project is planned to be part of a larger offshore wind energy generation project that will generate approximately 2,400 megawatts of renewable energy from federal waters. Development of this project will help advance Massachusetts' commitment to achieve net zero emissions by 2050.



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482 Main Street | Dennis, MA 02638
Tel: 508-619-3185 | info@apcc.org | www.apcc.org

In preparation of the Draft Environmental Impact Statement (DEIR), 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 ENF, two locations in Falmouth have been identified as potential landing sites for the offshore cables, with Worcester Avenue being the preferred site. Horizontal directional drilling (HDD) is proposed for the site to minimize impacts to the beach or existing infrastructure. Although the ENF suggests that there is little potential for adverse environmental impacts from the project at the proposed landing site, the DEIR should reconfirm that no environmental impacts, or potential long term adverse public use impacts, will occur at the landing sites, or in the HDD approach to the landing site. The ENF states that HDD is proposed to be employed for the final 0.54 nautical miles to the landfall location to avoid eelgrass beds “to the extent practicable and minimize unavoidable direct effects to seagrass beds.” APCC recommends that the DEIR specify the extent of potential or likely impacts to eelgrass beds and, if impacts are anticipated, the DEIR should explain why impacts cannot be avoided.

Onshore Cable Route

The ENF states that the onshore cables will be buried largely within existing roadway layouts between the landfall site and the proposed substation site, although there will be some temporary impacts to a community park that is Article 97 land. 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 DEIR that no greenspace (with the possible exception of the temporary disturbance of the community park area) or habitat areas will be cleared or otherwise affected in routing the onshore cable. The DEIR should include details of a construction plan to avoid stormwater runoff and erosion.

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 EIR 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. APCC recommends that the DEIR include specific information about a substation containment system that is capable of fully



capturing a potential spill of substation equipment dielectric fluid. APCC further recommends that the project applicant's substation spill containment plan should include information about the substation spill containment capacity as well as stormwater containment capacity. For example, the New England Wind 1 substation proposal includes containment capacity for 110% of dielectric fluid in the substation plus 30 inches of rain.

The ENF reports that there will be impacts to Isolated Wetland that will occur as a result of constructing the Lawrence Lynch substation site. APCC recommends that more information about this wetland site be included in the DEIR, including the quality of the wetland, what type of impacts will occur, why impacts are unavoidable, and what mitigation is being proposed.

Marine Mammal and Turtle Protection

Although much of the analysis pertaining to potential project impacts to marine mammals and turtles falls under federal jurisdiction, APCC would like to see discussion in the DEIR about the project applicant's plans for protecting marine species and the role of state environmental agencies in those efforts. It is critically important that Mayflower Wind's proposed marine species protection plan is consistent with federal standards and guidelines established for protecting marine mammals and turtles for offshore wind projects, and that those protection plans are also discussed with regard to the MEPA process and their applicability to state jurisdiction. 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's federally-submitted Construction and Operations Plan includes an avian exposure risk assessment designed to be in accordance with BOEM guidance. APCC looks forward to discussion in the DEIR about collaboration between the project applicant and the Massachusetts Natural Heritage and Endangered Species Program on efforts to protect avian and bat species as applicable to aspects of the project under state jurisdiction.

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 vital that the project demonstrate its commitment to protecting marine and land-based environmental resources while also meeting its renewable energy production objectives. APCC looks forward to reviewing more project details in the issue areas discussed above as the EIR process moves forward.

APCC thanks the Secretary for this opportunity to provide comments.

Sincerely,

A handwritten signature in blue ink, consisting of a stylized 'A' followed by a long horizontal stroke.

Andrew Gottlieb
Executive Director