

October 27, 2022

Andrew Gottlieb

Executive Director	
	Secretary Bethany A. Card
BOARD OF DIRECTORS	Executive Office of Energy and Environmental Affairs MEPA Office
Eliza McClennen President	Attention: Alexander Strysky, MEPA Analyst
Steven Koppel Vice President	Boston, MA 02114
Bob Ciolek Treasurer	RE: New England Wind 2 Connector Environmental Notification Form, EEA #16611
Jack Looney Clerk	Dear Secretary Card:
Tom Cohn John Cumbler	The Association to Preserve Cape Cod (APCC) has reviewed the Environmental Notification Form (ENF) for the New England Wind 2 Connector offshore wind development project and submits the following comments.
Marga Fonn	
Joshua Goldberg	Founded in 1968, APCC is the leading nonprofit environmental advocacy and education organization for the Cape Cod region, working for the adoption of laws,
DeeDee Holt	policies and programs that protect, preserve and restore Cape Cod's natural
Pat Hughes	resources.
Molly Karlson	APCC strongly supports the environmentally responsible development of offshore
Elysse Magnotto-Cleary	wind to help meet Massachusetts' ambitious 2050 net zero goals. It is imperative that we replace our nation's dependence on fossil fuels with clean, renewable
Blue Magruder	energy from different sources. Modern advancements in deep water offshore wind
Stephen Mealy	technology have positioned it to be one of the most viable and critically important
Wendy Northcross	sources for large-scale green energy production for the Northeastern U.S.
Kris Ramsay	The New England Wind 2 Connector, which is the portion of the Commonwealth
Robert Summersgill	Wind project under Massachusetts regulatory jurisdiction, is the largest renewable
Charles Sumner	energy project proposed in the New England region and fills a major role in
Taryn Wilson	achieving Massachusetts' commitment to offshore wind energy production. The project will provide 1,232 megawatts of clean energy, which will reduce ISO-NE CO ₂ e emissions by approximately 2.35 million tons per year, according to the ENF. NOx emissions would be reduced by 1,255 tons per year and SO ₂ emissions by

666 tons per year across the New England grid. The anticipated 1,232 megawatts to be produced by the project represents nearly double the peak load for the entire Cape Cod region, according to the ENF. Cleary, the project offers substantial benefits for Cape Cod, the Commonwealth of Massachusetts, New England, and the nation in efforts to mitigate climate change.

While the development of offshore wind projects such as New England Wind 2 represents a vital regional interest, it is also important that a comprehensive review of this and other wind projects be undertaken to ensure that environmental impacts will be avoided to the greatest extent possible and satisfactorily mitigated when avoidance is not possible. APCC recommends that the following issue areas be addressed in the Draft Environmental Impact Report (DEIR) for New England Wind 2.

Offshore Export Cable Corridor

APCC anticipates that further detailed analysis of the offshore cable corridor will be included in the DEIR. Since the proposed routing of the offshore cable closely aligns with the extensively analyzed routing for Vineyard Wind and New England Wind 1, it is assumed that minimal and temporary impacts to the seabed and habitat are to be expected. APCC recommends that the EIR review process provide additional information to reconfirm this assumption. It should also provide further study of any potential impacts from the small segment of offshore cable that deviates from the established corridor route in order to reach the proposed onshore landing site at Dowses Beach.

Dowses Beach Landfall Site

APCC recommends that the DEIR include additional information about the proposed horizontal directional drilling and associated activity at the landfall site, which the ENF states will be used to avoid impacts to coastal resources, coastal dune and coastal beach.

Onshore Transmission Cable Route

According to the ENF, both the preferred and the noticed alternative onshore transmission cable routes are located entirely within public roadway layouts or within the Dowses Beach parking lot. However, it appears the noticed alternative crosses a wetland (Bumps River) on Bumps River Road, as well as a perennial stream on Lumbert Mill Road. Both the preferred and noticed alternative routes appear to cross perennial streams on Old Falmouth Road and Oak Street. Project maps in the ENF also appear to show the cable route crossing mapped DEP hydrologic connections. APCC recommends that the DEIR should describe how impacts to these wetland resources will be avoided for both the preferred and noticed alternative routes. The ENF notes that the project applicant is receptive to working with the town of Barnstable to coordinate laying the onshore cable in conjunction with the town's installation of sewer lines along the route. As is the case with Vineyard Wind and New England Wind 1, enabling the town to take advantage of the wind project's onshore cable construction work on roadways would save the town millions of dollars in municipal sewer construction costs. APCC strongly encourages the project applicant and the town of Barnstable to work together in order to take advantage of the opportunity to install sewer lines along the proposed route of the New England 2 project in Osterville, which would help accelerate the timeline for sewering sections of town that are in great need of municipal wastewater infrastructure to address the area's serious water quality issues.

Substation

The new project substation is proposed for a 15.2-acre site that is located within an Aquifer Protection Overlay District and bordered by Article 97 lands. The ENF states that the project applicant is committed to providing a 110 percent containment system and sumps to capture potential spills at the substation site, including allowances for containing an extreme rain event. This appears to be consistent with the plans proposed for the Vineyard Wind and New England Wind 1 projects. The project applicant has also proposed to adopt a Spill Prevention, Control and Countermeasures Plan and other spill response measures to address potential spill risks to groundwater. Additionally, the ENF proposes a stormwater management system at the substation to capture, treat and recharge stormwater runoff at the site.

APCC anticipates that the spill prevention and stormwater plans are to be designed with comparable effectiveness to the plans for Vineyard Wind and New England Wind 1, and we look forward to reviewing more specific details on the plans in subsequent project filings through MEPA and through the Cape Cod Commission's Development of Regional Impact (DRI) review process.

The ENF states that construction of the substation will require significant clearing of the identified 15.2-acre site, which is currently undeveloped and tree-covered. To mitigate the land clearing, Cape Cod Commission DRI review requires a specified acreage of land to be set aside and permanently protected as open space either through direct acquisition of land or a monetary contribution by the project applicant. APCC encourages the project applicant to work with the town of Barnstable and the Barnstable Land Trust to identify land of appropriate acreage and natural resource value to satisfy the DRI open space requirement.

The ENF has identified three potential grid interconnect routes for cable to run from the project's new substation to the existing Eversource substation. Of those routes, it appears that grid interconnect route option 1 goes through Article 97 lands, while options 2 and 3 appear to



avoid Article 97 land. APCC supports the choice of a route that does not run through or otherwise impact Article 97 land.

Protection of Avian Species and Marine and Coastal Bird Habitat

Dowses Beach has been identified as habitat for piping plover and least tern, both state-listed rare species. The ENF indicates that the project applicant will continue to consult with the Natural Heritage and Endangered Species Program and anticipates utilizing measures to protect these bird species that were adopted for the Vineyard Wind and New England 1 landfall sites. APCC looks forward to more information in the DEIR about the project's shorebird protection efforts that would protect birds at the landfall site as well as during offshore project construction activity, including additional information about the adoption of a Piping Plover Protection Plan and time-of-year restrictions on construction.

The New England Wind Massachusetts Coastal Zone Management Act Consistency Certification that is included in the ENF states that the project applicant is "developing a framework for a post-construction bird monitoring program in relation to Vineyard Wind 1 that can be adapted to New England Wind. This framework is being developed through consultation with federal, state, and local agencies, and with input from other stakeholders." APCC welcomes the adoption of such a program and its applicability to New England Wind 2. APCC recommends that the DEIR provide more information on the role of New England Wind 2 in the development and implementation of the bird monitoring program.

Protection of Marine Mammals and Marine Turtles

Much of the attention for protection of marine mammals and marine turtles, especially ensuring protection of the North Atlantic right whale, has been focused on the offshore wind industry's activities in federal waters through the federal review and permitting process. The New England Wind 2 ENF provides little information about the project's efforts to avoid impacts to marine mammal and turtle species.

While much of the project's marine mammal and turtle protection and mitigation efforts fall within federal jurisdiction, APCC recommends that the DEIR include discussion about proposed marine species protection plans and monitoring programs intended to ensure continued protection of marine mammal and turtle species during construction and ongoing operation of the project, especially how those proposed plans and programs are to be applied in waters under the Commonwealth's jurisdiction.

Conclusion

New England Wind 2 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. The offshore wind industry can successfully help achieve our collective renewable energy production objectives while also effectively demonstrating its commitment to protecting marine and land-based environmental resources. APCC looks forward to reviewing more project details in the issue areas discussed above as the EIR process moves forward.

Sincerely,

Andrew Gottlieb Executive Director

