



February 17, 2023

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Executive Director

Program Chief
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Bureau of Ocean Energy Management
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RE: New England Wind Draft EIS

Dear BOEM Program Chief:

The Association to Preserve Cape Cod (APCC) has reviewed the Draft Environmental Impact Statement (DEIS) for the New England Wind offshore wind development project and submits the following comments.

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

APCC strongly supports the environmentally responsible development of offshore wind to help meet the nation's climate mitigation efforts and Massachusetts' ambitious 2050 net zero goals. It is imperative that we replace our nation's dependence on fossil fuels with clean, renewable energy from different sources. Modern advancements in deep water offshore wind technology have positioned it to be one of the most viable and critically important sources for large-scale green energy production for the Northeastern U.S.

The New England Wind project, proposed by Avangrid, is the largest renewable energy project proposed in the New England region and will play a major role in helping the Northeast meet regional commitments for offshore wind energy production. According to the DEIS, the proposed project consists of two phases: Phase 1, which is known as the Park City Wind Project, and Phase 2, which is known as the Commonwealth Wind Project. The project in total will provide between 2,036 and 2,600 megawatts of clean energy. According to Avangrid, the renewable energy

generated by the project will be enough to reduce emissions by nearly four million tons and power over one million households across New England. This is a substantial benefit to the New England region that will help us transition our electrical grid away from the use of fossil fuels to one that is powered by green sources.

While the development of offshore wind projects such as New England Wind 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. Toward that objective, APCC commends BOEM on its thorough analysis of the New England Wind project.

APCC provides the following comments, with emphasis on aspects of the project that pertain to Cape Cod and its surrounding waters.

Offshore Export Cable Corridor

Since the proposed routing of the offshore cable closely aligns with the extensively analyzed routing for Vineyard Wind, it is assumed that minimal and temporary impacts to the seabed and habitat are to be expected, which is supported by BOEM's analysis in the DEIS.

Landfall Sites

The DEIS states that horizontal directional drilling will be used at the proposed Phase 1 Craigville Beach landfall site and the proposed Phase 2 Dowses Beach landfall site to avoid impacts to coastal resources, coastal dunes and coastal beaches. APCC supports this proposed method for the cables to make landfall.

Onshore Transmission Cable Route

According to the DEIS, both the preferred and alternative onshore transmission cable routes for both phases on Cape Cod are located entirely within public roadway layouts or within the beach parking lots. However, APCC noted in our written comments on the project's Environmental Notification Form submitted to the Massachusetts Environmental Policy Act (MEPA) Office that it appears that the Phase 2 Commonwealth Wind project's cables cross several wetland areas along the onshore transmission route. Additional information should be provided to ensure that none of these wetland resource areas will be adversely impacted.

Avangrid has indicated its willingness to work with the town of Barnstable to coordinate laying the onshore cable in conjunction with the town's installation of sewer lines along the proposed routes. 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 enthusiastically supports efforts by Avangrid and the town of Barnstable to take advantage of the opportunity to install sewer lines along the proposed route, which would help accelerate the timeline for sewerage 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. Avangrid has stated its commitment 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 approved for the Vineyard Wind project. Avangrid 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 project proposal includes 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 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.

Protection of Marine Mammals, Turtles and Birds

Ensuring the protection of marine environmental resources and wildlife, especially at-risk marine mammals, sea turtles and birds, is extremely important in the review of this, and all, offshore wind projects. Avangrid has indicated its commitment to working with federal and state agencies to avoid and/or mitigate impacts to marine mammal, turtle and bird species.

According to the DEIS, impacts to marine mammals from the proposed project during construction, operations, and decommissioning of Phase 1 and Phase 2 would likely have negligible to moderate adverse impacts and could potentially include minor beneficial impacts due to the reef effect associated with the turbines. The DEIS states that the project would also likely have negligible to moderate impacts on sea turtles, with minor beneficial impacts from the presence of the structures. Likewise, the DEIS reports that significant adverse impacts to bird species are not anticipated during project construction, operation or decommissioning.

APCC calls on Avangrid, government agencies and key stakeholder groups to continue to collaborate on developing and improving protocols for avoiding impacts to bird, marine mammals and turtles and to further adopt effective mitigation programs to address any impacts that may occur. BOEM should impose requirements that utilize the most advance



science to ensure protection of these species. This is particularly important in the effort to protect the critically endangered North Atlantic right whale from potential project impacts.

Conclusion

New England 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. 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.

Sincerely,

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

Andrew Gottlieb
Executive Director