



Andrew Gottlieb  
Executive Director

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Cape Cod Commission  
3225 Main St.  
Barnstable, MA 02630

**RE: New England Wind 1 Connector Development of Regional Impact**

Dear Cape Cod Commission:

The Association to Preserve Cape Cod (APCC) has reviewed the New England Wind 1 Connector Development of Regional Impact (DRI) 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.

APCC applauds the stated purpose of the New England Wind 1 Connector project, proposed by Park City Wind, to provide utility-scale renewable energy to approximately 400,000 homes and businesses that will result in an annual reduction of 1.59 million tons of CO2 emissions in New England, the equivalent of removing 310,000 cars from the road annually. Nitrogen oxides are expected to decrease across New England by 850 tons per year and sulfur dioxide by 450 tons per year. Offshore wind will improve energy security and reliability by reducing reliance on fossil fuels and supporting the transition to a renewable energy grid. The rapid deployment of offshore wind is essential to achieve the Northeast region's greenhouse gas emission reduction targets and limit the worst impacts of climate change.

The project benefits described above closely match those of the previously permitted Vineyard Wind project, which is currently under construction. On December 19, 2018, APCC issued a public statement endorsing the Vineyard Wind project, becoming the first nonprofit environmental organization in the nation to do so. The decision to support Vineyard Wind—and, in general, the

responsible development of offshore wind—followed comprehensive review by APCC of Vineyard Wind’s multiple state regulatory filings through the Massachusetts Environmental Policy Act process, as well as the release of the U.S. Bureau of Ocean Energy Management’s Draft Environmental Impact Statement for the project.

APCC’s review of the New England Wind 1 Connector project draws from the analysis conducted and conclusions reached by APCC for Vineyard Wind. Given the similarities between Vineyard Wind and New England Wind 1 Connector in proposed offshore and onshore routing, construction, operation, best management practices, monitoring, mitigation and other aspects of the project, including minimizing potential impacts to rare species, APCC does not see the likely potential for concern about additional unforeseen environmental impacts, or the project’s ability to properly mitigate any impacts that may occur. The project will continue with, and expand on, the Vineyard Wind project’s approved best management practices, monitoring and research, and investment mitigation aimed at protecting marine species—especially marine mammal species—and avian and bat species from offshore wind impacts.

The New England Wind 1 Connector preferred alternatives for the proposed offshore and onshore routes appear to provide the least potential for impacts to environmental resources. Any unavoidable impacts are anticipated to be temporary and minimal. APCC supports the applicant’s identified preferred route for the onshore cable, including the proposed Craigville Public Beach onshore landing site. (We acknowledge the unavoidable project work proposed within wetlands, rare species habitat and Article 97 lands at Craigville Beach, which is not likely to adversely affect natural resources at that location.)

In reviewing the project details, APCC notes there are still some aspects of the project that have not yet been finalized or clarified, such as:

- A finalized Spill Prevention, Control and Countermeasures Plan for the substation site. The project applicant states that the site design is intended to contain 110 percent of the dielectric fluid at the site, plus an additional 30 inches of storage to contain rainfall for extreme events. APCC’s expectation is that the spill prevention plan will be similar to, and as effective as, the plan developed for the Vineyard Wind substation. Since the proposed substation site is located in a Zone II, it is critically important that groundwater be protected from potential contamination.
- The method for satisfying the project’s DRI open space requirement to mitigate land clearing impacts associated with construction of the substation, which could include a monetary contribution or the acquisition and donation of land with appropriate acreage, location and natural resource value.

- A finalized stormwater pollution prevention plan for construction activity along the onshore cable route.
- Continued coordination with the state's Natural Heritage and Endangered Species Program for avoiding, minimizing and mitigating potential impacts to rare species habitat, including but not limited to finalization of a Piping Plover Protection Plan.

APCC looks forward to reviewing additional information on the above issues as the DRI regulatory review process for the project moves forward.

Finally, APCC commends the project applicant for pursuing discussions with the town of Barnstable about laying the project's land-based cables in coordination with Barnstable's planned sewer installation along the same route. Doing so would minimize construction disruptions along area roadways and save the town money. Importantly, the end result will reduce wastewater impacts on water resources, including impacts to Wequaquet Lake—another significant project benefit in addition to the clean energy the project will provide.

APCC thanks the Cape Cod Commission for this opportunity to provide comments.

Sincerely,



Andrew Gottlieb  
Executive Director