



Andrew Gottlieb
Executive Director

March 30, 2023

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Elizabeth Klein, Director

U.S. Bureau of Ocean Energy Management

Attention: Program Chief

Office of Renewable Energy

45600 Woodland Road

Sterling, VA 20166

RE: SouthCoast Wind (formerly Mayflower Wind) COP DEIS

Dear Director Klein:

The Association to Preserve Cape Cod (APCC) submits the following comments on the Draft Environmental Impact Statement (DEIS) for the SouthCoast Wind (formerly Mayflower Wind) offshore wind energy project.

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.

APCC strongly supports the responsible development of offshore wind energy projects to address the energy demands for the Northeast region and the nation. There is an urgent need to replace our nation's dependence of fossil fuels with clean, renewable energy, and offshore wind promises to become one of the most viable sources for commercial-scale green energy production. According to the DEIS, the SouthCoast Wind project will generate up to 2,400 MW of clean, renewable wind energy to the Northeast, including Massachusetts, which is consistent with the Commonwealth's goal to achieve net zero carbon emissions by 2050. The SouthCoast Wind project will be an important contributor in the effort to meet our renewable energy objectives.

SouthCoast Wind proposes to construct up to 147 wind turbine generators and up to five offshore substation platforms connected to two offshore export cable corridors with landfalls at Falmouth and Brayton Point, Massachusetts. Onshore facilities would include landfall locations, onshore export cables, one substation, one converter station, underground transmission lines, and points of interconnection to the existing utility grid.

Potential Impacts to Environmental Resources

In reviewing the project details in the DEIS, APCC agrees with the conclusion reached by BOEM that most potential unavoidable adverse impacts associated with the SouthCoast

Wind project would occur during the construction phase, would be temporary, and can be successfully mitigated. These include:

- **Offshore Water Quality:** The project would result in temporary minor impacts on offshore water quality due to sediment resuspension, discharges, and accidental releases.
- **Benthic Resources:** The project would result in negligible to moderate impacts, with the potential for moderate beneficial impacts due to the creation of new habitat.
- **Coastal Habitat and Fauna:** The project would result in minor impacts that would be localized, temporary, and minimized through best management practices.
- **Birds:** Construction, installation, operation and maintenance, and eventual decommissioning of the project “would have minor impacts on birds, depending on the location, timing, and species affected by an activity.” It would also provide potential minor benefits from new foraging opportunities for marine birds.
- **Bats:** The project would result in minor impacts on bats, with offshore structures having a negligible impact on bat populations.
- **Sea Turtles:** The project overall would have negligible to minor impacts on sea turtles, while new habitat from offshore structures would potentially result in minor beneficial impacts.
- **Marine Mammals:** The project would result in negligible to major adverse impacts, but could also include potentially beneficial impacts. The DEIS states that the source of potential adverse impacts would be mainly from underwater noise associated with UXO detonations and impact pile-driving, but does include the potential for vessel strikes. However, the DEIS also states that the implementation of appropriate mitigation measures developed in consultation with the National Marine Fisheries Service would reduce or eliminate the potential for Endangered Species Act-listed species to be killed, injured, or experience “high-severity behavioral effects” from project-related activity.

It is imperative that the planning and implementation of responsible development of offshore wind projects be structured around mitigation measures and policies that are effective in protecting environmental resources, including sea turtles, birds, bats, and marine mammals, especially at-risk species, and, in particular, the critically endangered North Atlantic right whale.

The mitigation measures required by BOEM and those proposed by SouthCoast Wind as described in the DEIS appear to be comprehensive. However, APCC urges BOEM and relevant federal agencies to continue to consider the adoption of additional requirements for rigorous monitoring programs related to marine mammal, sea turtle, bird and bat species protections, as well as the adoption of additional requirements and other best management practices, as necessary, for construction, operation and



decommissioning phases of the project that will help improve avoidance of project impacts to those resources. Monitoring, best management practices and mitigation should employ measures that utilize the most advanced science and that can be adapted and refined as necessary throughout the life of the project.

Onshore Cable Routing

Three locations in Falmouth have been identified as potential landfall locations for the offshore cables: Worcester Avenue (preferred site), Central Park (alternate site), and Shore Street (alternate site). Horizontal directional drilling (HDD) is proposed to bring the cable onshore in order to avoid adverse impacts to nearshore resources, the beach and infrastructure. The Falmouth onshore cables will be installed underground within area roadway layouts or other disturbed areas to minimize disturbance to natural habitat areas and vegetation. The underground cable will be routed to a new substation at one of two potential locations: the Lawrence Lynch site at Gifford Street (preferred site) and the Cape Cod Aggregates site at Thomas Landers Road (alternate site).

APCC supports the proposed HDD method for bringing the cables onshore and the use of existing roadway layouts to minimize environmental impacts. We also commend the selection of the two potential substation sites that would utilize previously disturbed land.

Conclusion

SouthCoast 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 equally important that SouthCoast Wind, through the adoption of mitigation, monitoring and best management practices identified in the federal, state, regional, and local permitting processes, effectively protect marine and land-based environmental resources while also meeting its energy production objectives.

APCC thanks BOEM for this opportunity to provide comments.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Andrew Gottlieb', with a long horizontal flourish extending to the right.

Andrew Gottlieb
Executive Director