



August 30, 2023

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Secretary Rebecca Tepper
Executive Office of Energy and Environmental Affairs
MEPA Office

Attention: Alexander Strysky, MEPA Analyst
100 Cambridge Street, Suite 900
Boston, MA 02114

**RE: New England Wind 2 Connector Draft Environmental Impact Report,
EEA #16611**

Dear Secretary Tepper:

The Association to Preserve Cape Cod (APCC) has reviewed the Draft Environmental Impact Report (DEIR) for the New England Wind 2 Connector offshore wind development project and submits the following written 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.

Offshore wind development is one of the most critically important sources for large-scale renewable energy production in the Northeastern U.S. It is imperative that we replace our dependence on fossil fuels with clean energy to meet Massachusetts' ambitious 2050 net zero goals. APCC enthusiastically supports the environmentally responsible development of offshore wind for this purpose.

The New England Wind 2 Connector—the portion of the Commonwealth Wind project under Massachusetts regulatory jurisdiction—is the largest renewable energy project proposed in the New England region thus far and will contribute greatly to the effort to achieve Massachusetts' commitment to offshore wind energy production. According to the DEIR, the project will produce 1,200 MW of clean energy, enabling the reduction of approximately 2.35 million tons per year (tpy) of greenhouse gas emissions. This is the equivalent of removing approximately 460,000



gasoline-burning cars from the road. Nitrogen oxides emissions will be displaced by approximately 1,255 tpy and sulfur oxides (SOx) by approximately 666 tpy. All of the above are significant project benefits.

The New England Wind 2 DEIR provided useful information on the many issue areas related to the project, as well as providing more details on the project applicant's proposals for avoiding, minimizing and mitigating potential environmental impacts.

Offshore Export Cable Corridor

According to the DEIR, the offshore cable routing for the project is approximately 96 percent the same as the routing for the New England Wind 1 Connector and the Vineyard Wind Connector, with only a 488-acre area divergence that accesses the proposed Dowses Beach landfall site. Due to the extensive study conducted in the review of the previous two projects, it is to be expected that the New England Wind 2 offshore cable installation in state waters will have a very minimal and temporary impact on environmental resources.

Dowses Beach Landfall Site

Based on the detailed information provided in this project's DEIR as well as the similar plans submitted for the Vineyard Wind and New England Wind 1 projects, APCC is satisfied that the proposed horizontal directional drilling method at the Dowses Beach landfall site will effectively avoid impacts to coastal resources, coastal dune, and coastal beach. Construction disruption to the beach parking lot will be temporary and will not affect environmental resources.

East Bay Road Crossing

From Dowses Beach, the onshore underground cable will cross the East Bay Road culvert that separates East Bay from Phinneys Bay. The project applicant's preferred method for crossing is to install a buried concrete duct bank within the pavement of the causeway above the existing culvert that would be supported by concrete footings placed on either side of the culvert. The proposed method to cross the causeway appears to avoid any interference with the function of the existing box culvert; however, it is unclear to APCC whether there have been any discussions by the town of Barnstable about potential future plans to replace the existing box culvert with a larger culvert to improve tidal flow, and if so, how it may impact the onshore cable span crossing the causeway.

Onshore Transmission Cable Route

As described in the DEIR and in the previous Environmental Notification Form (ENF) filing, 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 and are not



expected to impact environmental resources along the cable route. No impacts are anticipated at points where the cable route crosses perennial streams or other wetlands, due to the configuration of the underground cables within the footprint of the roadway layout.

The DEIR reaffirms the project applicant's commitment to working with the town of Barnstable on possible coordination of the underground cable construction with the town's installation of sewer lines along the route. As is the case with Vineyard Wind and New England Wind 1, such coordination would enable the town to take advantage of the wind project's onshore cable construction work on roadways, which would save the town millions of dollars in municipal sewer construction costs and speed up the delivery of much-needed wastewater infrastructure to this area of Barnstable.

APCC is aware there are individuals who have voiced opposition to the disruption that the cable construction would cause along Main Street in Osterville. However, APCC must point out that the town's planned installation of sewer lines on Main Street, which is vital in addressing the very serious water quality problems in this area of town, would still result in the same construction disruptions regardless of the New England Wind 2 project. APCC therefore strongly supports cooperative efforts between the project applicant and the town to coordinate their respective projects, and we urge the two parties to finalize their discussions and take advantage of the opportunity it provides.

Substation

The proposed project substation site is located within the Barnstable Aquifer Protection Overlay District and is adjacent to Article 97 protected open space. The project applicant has presented a revised substation design in the DEIR that includes the acquisition of additional property, which increases the size of the site from the original 15 acres to approximately 29 acres. The substation will still provide a 110 percent spill containment system to capture any potential spills from substation equipment, as originally described in the ENF.

The project applicant is also proposing to increase the 110 percent containment to accommodate a simultaneous Probable Maximum Precipitation event of up to 30 inches of rainfall in a 24-hour period. The proposed stormwater management system for the substation includes the utilization of low impact development strategies to capture, treat, and recharge stormwater runoff. The system also includes a "drain system that routes individual containment areas through an oil-absorbing inhibition device to an oil/water separator before draining to the infiltration basin." APCC supports the inclusion of these extra measures to ensure that groundwater resources are sufficiently protected.

Construction of the substation will require significant clearing of the site, which is currently



mostly forested. To mitigate the land clearing, Cape Cod Commission Development of Regional Impact (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.

Grid Interconnection Routes

A Preferred grid interconnection route (Fire Tower Access Road to Oak Street) that connects the project's substation with the existing Eversource substation on Oak Street, along with a Noticed Alternative grid interconnection route (Eversource ROW #342), have been identified in the DEIR. The DEIR also identifies a variant to the Preferred grid interconnection route (Variant 1). The Preferred route calls for burying the grid interconnection cables within the existing Fire Tower access road off Oak Street, which, according to the DEIR, must be resurfaced and widened from its current 11 feet to 20 feet to accommodate the cable installation and ongoing operation of the substation. This access road is located within Article 97 land, and widening the road would require the removal of trees along its route.

As stated in our written comments in the ENF, APCC encourages a grid interconnection route that avoids impacts to Article 97 lands. Altering Article 97 lands would require approval of the Massachusetts Legislature and would be subject to the Public Lands Preservation Act, which requires replacement of impacted Article 97 lands with land of equal or greater size and conservation value. APCC hopes the project applicant will work with the town of Barnstable and Eversource to identify alternatives that prevent Article 97 land impacts. If this proves to be impossible, APCC urges the project applicant to explore ways to reduce the proposed road widening and tree clearing, and to minimize temporary and permanent impacts to lands held in the public trust.

Protection of Bird Species, Marine and Coastal Bird Habitat, and Bat Species

Dowse's Beach has been identified as habitat for piping plover and least tern, both state-listed rare species. To protect these species, the project applicant has consulted with the Massachusetts Natural Heritage and Endangered Species Program (NHESP) and plans to adopt protective measures similar to those adopted for the cable landing sites for the Vineyard Wind and New England Wind 1 projects. The project applicant has included a draft Piping Plover and Least Tern Protection Plan in the DEIR that is based on consultations with NHESP and that appears to avoid project impacts to these bird species.

Based on consultation with federal and state agencies, the project applicant is finalizing a Draft Bird and Bat Monitoring Framework for the New England Wind project, which includes the New



England Wind 2 Connector component. The DEIR states that the project applicant has committed to developing an avian conservation program “to fund research, habitat conservation, and/or restoration for coastal bird species, including state-listed bird species” with the intention being “to implement a conservation program which will help to better understand and address direct and indirect effects of offshore wind development on coastal bird species in Massachusetts.” APCC commends the project applicant for its programs to protect bird and bat species and prevent significant impacts from occurring.

Protection of Marine Mammals and Marine Turtles

The DEIR has also provided more information on the project’s consultations with federal and state agencies to develop programs designed to protect marine mammals and marine turtles. Initiatives include mitigation measures to reduce noise risks to marine mammals from construction and installation, O&M, and decommissioning; environmental training for project personnel; vessel strike avoidance practices; the use of protected species observers and passive acoustic monitoring technology; pile-driving seasonal restrictions, soft-start procedures, and shutdown procedures in the lease area in federal waters; and noise reduction technology. Although refinement of the project’s mitigation and monitoring programs is ongoing, APCC is satisfied that the project will result in no significant impacts to marine mammal and turtle species in state or federal waters, based on similar programs adopted for Vineyard Wind and New England Wind 1.

Conclusion

If approved and built, the New England Wind 2 offshore wind project will make a significant contribution to the Commonwealth’s goal of achieving net zero emissions by 2050. APCC encourages the project applicant to continue working with federal, state, regional and local regulators to refine mitigation strategies, finalize project details and resolve the remaining outstanding issue areas that will allow the project to move forward.

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