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CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS
ON THE
ENVIRONMENTAL NOTIFICATION FORM

PROJECT NAME	: New England Wind 2 Connector
PROJECT MUNICIPALITY	: Barnstable, Edgartown, Mashpee and Nantucket
PROJECT WATERSHED	: Cape and Islands
EEA NUMBER	: 16611
PROJECT PROPONENT	: Commonwealth Wind, LLC
DATE NOTICED IN MONITOR	: October 7, 2022

Pursuant to the Massachusetts Environmental Policy Act (M.G.L. c. 30, ss. 61-62I) and Section 11.03 of the MEPA Regulations (301 CMR 11.00), I hereby determine that this project **requires** the preparation of a mandatory Environmental Impact Report (EIR). This Certificate includes a Scope for the Draft EIR (DEIR).

The project is a component of a 1,232-megawatt (MW) wind energy generating facility known as Commonwealth Wind (CW) to be constructed approximately 20 miles south of Martha's Vineyard. The generating facility will occupy an approximately 54,857 to 74,873 acre of Lease Area OCS-A 0534. Lease Area OCS-A 0534 originally constituted the southern part of the larger Lease Area OCS-A 0501, which was awarded through a competitive lease sale conducted by the federal Bureau of Ocean Energy Management (BOEM). A second wind farm project with a generating capacity of approximately 800 MW is proposed in Lease Area OCS-A 0534 by Park City Wind LLC. The Park City Wind (PCW) project was procured by Connecticut, and includes transmission infrastructure known as New England Wind 1 Connector (NEW1C), which completed MEPA in January 2022 (EEA# 16231). The PWC and CW projects are being reviewed by BOEM as Phases 1 and 2, respectively, of a larger project, known as the New

England Wind project. which covers the entire Lease Area OCS-A 0534.[1] A third generating facility is proposed by Vineyard Wind 1 LLC in the remaining Lease Area OCS-A 501; components of the transmission infrastructure associated with the Vineyard Wind (VW) project, known as the Vineyard Wind Connector 1 (VWC1) completed MEPA review in 2019 (EEA #15787). As described below, an offshore cable route corridor established for the VWC1 project has been generally adopted by the NEW1C and NEW2C projects. All three projects are being undertaken by affiliates of Avangrid Renewables, which has full ownership of Lease Area OCS-A 0534 and holds an option to gain operational control over VW once it reaches commercial operation.[2]

The CW project is being developed in response to a solicitation for a 1,600 MW of offshore wind energy generation overseen by the Massachusetts Department of Energy Resources (DOER) and private Electric Distribution Companies (EDCs).[3] The solicitation was issued to help ensure diversified sources of electricity and meet required greenhouse gas (GHG) reductions in accordance with Section 83C of Chapter 169 of the Acts of 2008, as amended by Chapter 188 of the Acts of 2016 (An Act to Promote Energy Diversity), Chapter 8 of the Acts of 2021 (An Act Creating a Next Generation Roadmap for Massachusetts Climate Policy), Chapter 24 of the Acts of 2021 (An Act Making Appropriations for the Fiscal Year 2022) and Chapter 179 of the Acts of 2022 (An Act Driving Clean Energy and Offshore Wind). The CW project, one of two winning bids submitted in response to the solicitation, will provide approximately 1,200 MW under long-term contracts with the EDCs and potentially 32 MW will be contracted separately with municipal light providers (MLPs) or other users in Massachusetts. According to the ENF, the CW project will result in avoided emissions of 2.35 million tons per year (tpy) of carbon dioxide (CO_2e), 1,255 tpy of nitrogen oxides (NOx) and 66 tpy of sulfur dioxide (SO_2).

Major elements of the CW project include a wind turbine array with 64 to 88 wind turbine generators (WTG) spaced approximately 1.15 miles apart; up to three offshore electrical service platforms (ESPs); inter-array cable connections between WTGs and ESPs; offshore export cables; onshore export cables; and an onshore substation. The offshore export cables will follow an approximately 47.2-mile long route from the WTG array to the landfall site at Dowses Beach in Barnstable. The components of the project located within Massachusetts state waters are known as the New England 2 Connector (NEW2C), which is the project name used for purposes of state permitting within the Commonwealth.

Project Description

Project components include three 275-kilovolt (kV) offshore export cables, each of which will be up to 23 miles long, an approximately 6.7-mile long underground concrete duct bank within which the onshore export cables be placed and a new electrical substation.

[1] https://www.boem.gov/renewable-energy/state-activities/new-england-wind-formerly-vineyard-wind-south#:~:text=In%20October%202021%2C%20the%20project,project%20changed%20to%20Commonwealth%20Wind.

[2] https://www.vineyardwind.com/press-releases/2021/9/21/avangrid-renewables-and-copenhagen-infrastructure-partnersannounce-strategic-transaction-to-advance-offshore-wind-development

[3] The remaining approximately 400 MW in this solicitation was awarded to the Mayflower Wind Project (EEA# 16507 and 16596).

Offshore Export Cable

Each offshore export cable will include a three-core 275-kV high voltage alternating current (HVAC) cable bundled with one or more fiber optic cables. The offshore export cables will be installed within an Offshore Export Cable Corridor (OECC) which extends from the proposed wind farm location approximately 20 miles south of Martha's Vineyard, through Muskeget Channel and Nantucket Sound, to Dowses Beach. Except for the northernmost 1.5 miles (488 acres) of the OECC between Centerville Harbor and Dowses Beach, the OECC was identified based on marine surveys evaluated through the review and permitting of the VWC1 and NEW1C projects, which will also be located within the OECC. The ENF included a description of the benthic and pelagic conditions within the new section (approximately 488 acres) of the OECC. The ENF identified a supplemental offshore cable route, the Western Muskeget Variant, within which one or two of the cables may be placed if conditions within the Muskeget Channel section of the OECC do not allow for placement of all three offshore export cables associated with the NEW2C project (in addition to the total of four cables proposed for the VWC1 and NEW1C projects). The OECC ranges in width from 3,100 ft to 5,500 ft, with a typical width of 3,500 ft. The three cables will be installed approximately 164 ft to 328 ft apart from one another and from any cables associated with the VWC1 and NEW1C cables. The cables will be buried approximately five to eight feet (1.5 to 2.5 meters) below the seafloor using a trenching tool or, if necessary, by dredging a deeper trench to ensure adequate burial depth. Where burial is not possible due to subsurface conditions, the cables will be laid on the ocean floor and covered with armoring.

Landfall

The three offshore export cables will be transitioned from the offshore environment to landfall at Dowses Beach through approximately one mile long underground conduits installed using Horizontal Directional Drilling (HDD). The landward end of each of the three conduits will be located within an underground vault in the Dowses Beach parking lot, where the three conductors in each cable (a total of nine conductors in the three cables) will be separated and installed in separate conduits within a buried concrete duct bank.

Onshore Route

The underground duct bank carrying the conductors will follow an approximately 6.7-mile long route from the Dowses Beach parking lot to the site of a proposed substation off Oak Street in West Barnstable. The proposed onshore route follows the Dowses Beach parking lot and driveway to East Bay Road, then proceeds 0.2 miles south on East Bay Road, 0.9 miles northwest on Wianno Avenue, 1.1 miles north on Main Street, 1.9 miles north on Osterville-West Barnstable Road, 0.9 miles northeast on Old Falmouth Road, 0.2 miles east on Old Stage Road, 1.0 miles northeast on Oak Street and 0.2 miles west on Service Road. The final 0.1 mile section of duct bank will be installed below Route 6 using a trenchless crossing technique known as pipe packing to the proposed substation site north of Route 6, south of an existing Eversource transmission right-of-way (ROW) #342 and west of Oak Street. The ENF also identified an alternate route (referred to in the ENF as the "Noticed Alternative" or "Old Mill Road Alternative") and a route variation involving a section of Main Street east of Wianno Avenue and west of East Bay Road ("Main Street Variation").

Substation

The proposed substation will be constructed on an approximately 12.4-acre portion of a 15.2-acre site located north of Route 6 and west of Oak Street. The substation will include equipment that will step up the 275-kV voltage of the proposed onshore export cables to 345-kV. The power will be conveyed from the proposed substation to the existing West Barnstable Substation through cables installed in a 0.4- to 0.5-mile long duct bank. The electricity will then be delivered to the grid.

Project Site

The OECC extends from the southern portion of Nantucket Sound between Martha's Vineyard and Nantucket, enters an area in Nantucket Sound that is outside of state waters, then reenters state waters south of Barnstable. All sections of the cable route in state waters lie within the Cape and Islands Ocean Sanctuary (CIOS) and the Massachusetts Ocean Management Plan (OMP) planning area.

The substation is proposed on a forested 15.2-acre site off Oak Street. The site is bordered to the south by Route 6 and the Department of Conservation and Recreation's (DCR's) West Barnstable Fire Tower, to the west by undeveloped land, to the east by a single-family home and undeveloped land and to the north by the Town's Spruce Pond Conservation Area. Eversource's ROW #342 is located within the Spruce Pond Conservation Area. The substation site is zoned for residential use and located within an Aquifer Protection Overlay District. Oak Street is approximately 0.25 miles east of the site. The West Barnstable Substation is bordered to the south by Route 6, to the east by undeveloped land, to the north by the Oak Street Substation and to the west by undeveloped land and Oak Street.

According to the Natural Heritage and Endangered Species Program (NHESP), the project will be located within areas of Priority and Estimated Habitat for rare species. The offshore cable route passes through habitat of Roseate Tern (*Sterna dougallii*)[4], Common Tern (*Sterna hirundo*), Least Tern (*Sternula antillarum*) and Piping Plover (*Charadrius melodus*).[5] The Noticed Alternative onshore cable route passes through Priority Habitat for the Water Willow Stem Borer moth (*Papaipema sulphurate*). Northern Right Whale (*Eubalaena glacialis*), Humpback Whale (*Megaptera novaeangliae*), marine birds such as Long-tailed Duck, Northern Gannet, Razorbill, Wilson's Storm Petrel, fulmars, loons, scoters, and shearwaters, and Loggerhead (*Caretta caretta*) and Leatherback (*Dermochelys coriacea*) sea turtles have been observed throughout Nantucket Sound.

The Massachusetts Division of Marine Fisheries (DMF) has indicated that Nantucket Sound, through which the OECC passes, includes areas of commercial and recreational fishing and habitat for a variety of invertebrate and finfish species, including channeled whelk (*Busycotypus canaliculatus*), knobbed whelk (*Busycon carica*), longfin squid (*Doryteuthis pealeii*), summer flounder (*Paralichthys dentatus*), windowpane flounder (*Scophthalmus aquosus*), scup (*Stenotomus chrysops*), surf clam (*Spisula solidissima*), sea scallop (*Argopecten*

[4] Species also federally protected pursuant to the U.S. Endangered Species Act (ESA, 50 CFR 17.11).
[5] Ibid.

irradians), quahog (*Mercenaria mercenaria*), horseshoe crabs (*Limulus polyphemus*), and blue mussel (*Mytilus edulis*). Blue mussel and kelp (*Saccharina latissima*) aquaculture operations are also located within Horseshoe Shoals (a subtidal area of Nantucket Sound). Waters offshore of Dowses Beach and east of Edgartown contain mapped eelgrass (*Zostera marina*) habitat.

As shown on the Federal Emergency Management Agency's (FEMA) National Flood Hazard Layer, Dowses Beach, including the parking lot and driveway, are located in a coastal flood zone with a velocity hazard (VE zone) with a base flood elevation (BFE) of 15 ft NAVD 88. Sections of East Bay Road adjacent to Dowses Beach and at the intersection of East Bay Road and Main Street are located within a zone with a 1% annual chance of flooding (AE Zone) with a BFE of 12 ft NAVD 88 and a section of Bumps River Road is within an AE Zone with a BFE of 10 ft NAVD 88.

The Massachusetts Board of Underwater Archaeological Resources (BUAR) has identified Nantucket Sound as an area of high sensitivity that is rich in submerged ancient Native American cultural resources and shipwrecks. The onshore export cable will pass by and through historical and archaeological resources and areas included in the Massachusetts Historical Commission (MHC) Inventory of Historic and Archaeological Assets of the Commonwealth (Inventory) and State and National Registers of Historic Places.

The project is not located within an Environmental Justice (EJ) Designated Geographic Area (DGA) as defined in 301 CMR 11.02 because there are no EJ populations within one mile of the project site. Project components are within five miles of one EJ population designated as Minority located in Mashpee; five EJ populations designated as Minority and four EJ populations designated as Minority and Income in Barnstable; and one EJ population designated as Minority and one EJ population designated as Income located in Yarmouth. As noted below, port facilities and future operations and maintenance (O&M) areas that will support project implementation are located near EJ populations. The DEIR should provide details about the nature and scope of these activities so as to determine whether analysis of impacts on those EJ neighborhoods should be included as part of the review of this project.

Environmental Impacts and Mitigation

Potential environmental impacts of onshore components of the project include alteration of 15.2 acres of land, creation of 1.2 acres of impervious area, and alteration of 19,682 sf of Land Subject to Coastal Storm Flowage (LSCSF) and 11,336 sf of Riverfront Area. Potential environmental impacts of offshore components within Commonwealth waters include alteration of 183 acres of Land Under the Ocean (LUO) and 7.1 acres of Land Containing Shellfish (LCS), and dredging of up to 91,500 cubic yards (cy) of sediment in connection with installation of the offshore export cables. Both onshore and offshore components of the project will be located in rare species habitat and in areas containing cultural, historic and archaeological resources.

The ENF briefly reviewed potential measures that may be implemented to minimize environmental impacts during the construction period. The Scope below includes additional analyses and information that must be provided in the DEIR to assess the project's environmental impacts and identify measures to avoid, minimize and mitigate impacts.

Permitting and Jurisdiction

The project is undergoing MEPA review and is subject to preparation of a mandatory EIR pursuant to 301 CMR 11.03(3)(a)(1)(b) and 301 CMR 11.03(7)(a)(4) because it requires Agency Actions and will result in the alteration of ten or more acres of any other wetlands (LUO) and involves construction of electric transmission lines with a capacity of 230 or more kV, provided the transmission lines are five or more miles in length along new, unused or abandoned ROW. It also exceeds ENF thresholds at 301 CMR 11.03(1)(b)(3) (conversion of land held for natural resources purposes in accordance with Article 97 of the Amendments to the Constitution of the Commonwealth to any purpose not in accordance with Article 97); 301 CMR 11.03(1)(b)(5) (release of an interest in land held for conservation, preservation or agricultural or watershed preservation purposes; conversion of land held for natural resources purposes in accordance with Article 97 of the Amendments to the Constitution of the Commonwealth to any purpose not in accordance with Article 97); 301 CMR 11.03(3)(b)(3) (dredging of 10,000 or more cy of material) and 301 CMR 11.03(7)(b)(4) (construction of electric transmission lines with a capacity of 69 or more kV that are over one mile in length). The project may meet or exceed additional ENF review thresholds at 301 CMR 11.03(2)(b)(2) (disturbance of greater than two acres of designated priority habitat that results in a take of a state-listed rare species) and 301 CMR 11.03(3)(b)(1)(a) (alteration of coastal dune, barrier beach or coastal bank).

The project will require a Section 401 Water Quality Certification (WQC) and a Chapter 91 (c. 91) License from the Massachusetts Department of Environmental Protection (MassDEP); approval under MGL Chapter 164 Section 69J from the Energy Facility Siting Board (EFSB); approval under MGL Chapter 164 Section 72 and a Chapter 40A Section 3 Zoning Exemption from the Department of Public Utilities (DPU); an Access Permit from the Massachusetts Department of Transportation (MassDOT); a Field Investigation Permit from MHC; a Special Use Permit from BUAR; and Federal Consistency Review by the Massachusetts Office of Coastal Zone Management (CZM). It may require a Conservation and Management Permit (CMP) from NHESP. The Project is subject to reviews under the OMP, Ocean Sanctuaries Act and the MEPA Greenhouse Gas (GHG) Emissions Policy (the Policy), and requires Article 97 legislation.

The project requires Orders of Conditions from conservation commissions in Barnstable, Edgartown, Yarmouth, Nantucket and Mashpee (and in the case of an appeal, Superseding Orders of Conditions MassDEP). It requires Development of Regional Impact (DRI) review from the Cape Cod Commission (CCC) and Martha's Vineyard Commission (MVC).

The project must undergo environmental assessments as part of approval of lease terms from BOEM,[6] and requires an Individual Permit from the Army Corps of Engineers (ACOE) under Section 404 of the Clean Water Act (CWA) and Section 10 of the Rivers and Harbors Act (Section 10); a Letter of Authorization or Incidental Harassment Authorization from the National

[6] During its review, BOEM must comply with its obligations under the National Environmental Policy Act (NEPA), the NHPA, the Magnuson-Stevens Fishery Conservation and Management Act (MSFCMA), the Migratory Bird Treaty Act (MBTA), the Clean Air Act (CAA), and the Endangered Species Act (ESA). BOEM will coordinate/consult with other Federal agencies including NMFS, United States Fish and Wildlife Service (USFW), EPA, and USGC). BOEM will also coordinate with the State pursuant to the Coastal Zone Management Act (CZMA).

Marine Fisheries Service (NMFS); Private Aids to Navigation authorization from the U.S. Coast Guard (USCG); a No Hazard Determination from the Federal Aviation Administration (FAA); consultation with MHC in accordance with Section 106 of the National Historic Preservation Act (NHPA) of 1966 and M.G.L. Chapter 9, Sections 26-27C; and a National Pollutant Discharge Elimination System (NPDES) Construction General Permit and Outer Continental Shelf Air Permit from the U.S. Environmental Protection Agency (EPA).

Because the Proponent is not seeking Financial Assistance, MEPA jurisdiction extends to those aspects of the project that are within the subject matter of required or potentially required Permits or within the area subject to a Land Transfer that are likely, directly or indirectly, to cause Damage to the Environment. The subject matter of the EFSB/DPU approvals, OMP review and the c. 91 License are sufficiently broad such that MEPA jurisdiction is functionally equivalent to full scope jurisdiction and extends to all aspects of the project that are likely, directly or indirectly, to cause Damage to the Environment.

Review of the ENF

The ENF provided a project description and conceptual plans of the offshore export cable route, onshore export cable route alternatives and the proposed substation. It identified the project's potential impacts on land, wetland resources, and benthic conditions in Nantucket Sound, as well as temporary impacts associated with the construction period. The ENF identified potential measures to avoid, minimize and mitigate impacts. Consistent with the MEPA Interim Protocol on Climate Change Adaptation and Resiliency, the ENF contained an output report from the MA Climate Resilience Design Standards Tool prepared by the Resilient Massachusetts Action Team (RMAT) (the "MA Resilience Design Tool"),[7] together with information on climate resilience strategies to be undertaken by the project. The DEIR should provide a more detailed description of the project's impacts and mitigation measures, as set forth in the Scope below.

Many commenters questioned the need for the offshore export cables to make landfall at Dowses Beach and expressed concern about potential impacts of the project on recreational and environmental resources at the site. The DEIR should provide greater detail on the nature, extent and duration of proposed activities and structures, including long-term maintenance of project components. It should describe all measures that could be implemented by the Proponent to avoid and minimize environmental impacts, and identify mitigation measures.

SCOPE

General

The DEIR should follow Section 11.07 of the MEPA regulations for outline and content and provide the information and analyses required in this Scope. It should clearly demonstrate that the Proponent will avoid, minimize and mitigate Damage to the Environment to the maximum extent practicable through project alternatives and design.

[7] https://resilientma.org/rmat_home/designstandards/

Project Description and Permitting

The DEIR should include plans and a detailed description of existing conditions, including site topography, soil conditions, and infrastructure. It should describe the project and identify any changes to the project since the filing of the ENF. It should include updated site plans for existing and post-development conditions at a legible scale. The plans should depict existing and proposed conditions for all project elements, including the export cable, HDD, and land-based facilities. Plans should be provided at a legible scale and clearly identify buildings, impervious areas, and boundaries of tidelands, wetland resource areas, drinking water supply protection zones, rare species habitat, and information required in the OMP and the Scope below. The DEIR should provide detailed descriptions of proposed construction activities, associated with offshore cable installation, HDD, onshore cable installation and substation construction, describe associated environmental impacts and identify measures to minimize and mitigate any impacts that cannot be avoided. The DEIR should provide plans detailing conditions within the OECC using Coastal and Marine Ecological Classification Standard (CMECS) categories displayed at a suitable scale. It should describe offshore and onshore cable routes, offshore and onshore cable installation methods, and decommissioning activities, and associated impacts and proposed mitigation measures. The DEIR should describe the design of the substation, interconnection to the transmission system and stormwater management measures. The DEIR should identify and describe measures to avoid, minimize and mitigate the project's impacts.

The VWC1 project has completed permitting, and has begun installation of offshore export cables. The analyses described below should be informed by actual conditions and performance of construction techniques for the VWC1 project. It should compare preliminary observations regarding offshore conditions, the effectiveness of construction techniques, unanticipated obstacles, duration of activities, and other factors, in comparison to expectations and estimates identified during environmental reviews of the VWC1 project.

While the project referenced as NEW2C consists of activities in state waters, it is integrally related to the larger offshore wind development occurring beyond state waters that may have significant impacts on important resources and activities in the Commonwealth, such as commercial fisheries, navigation and rare species. To support meaningful agency and public review of the project and assessment of alternatives to avoid, minimize and mitigate impacts in state waters, the DEIR should include contextual and background information related to project elements in both federal and state waters, including efforts made to avoid, minimize and mitigate impacts both for the project as a whole and cumulatively across all related projects being undertaken by the Proponent and by other proponents in a similar time frame and geographical area within the Commonwealth. Information that is or will become available through federal processes should be disclosed through the MEPA review process as it becomes available, to the extent it is relevant to areas of MEPA jurisdiction, as background and context to inform the state MEPA review and to assist CZM in its Federal Consistency Review of the project. Specific topics and information from federal reviews that are required to inform this review are itemized in greater detail below.

The DEIR should include plans and a detailed description of existing conditions, including site topography, soil conditions, and infrastructure. It should describe the project and identify any changes to the project since the filing of the ENF. It should include updated site plans for existing and post-development conditions at a legible scale. The plans should depict

existing and proposed conditions for all project elements, including the export cable, HDD, and land-based facilities. Plans should be provided at a legible scale and clearly identify buildings, impervious areas, and boundaries of tidelands, wetland resource areas, drinking water supply protection zones, rare species habitat, and information required in the OMP and the Scope below. The DEIR should provide plans detailing conditions within the OECC using Coastal and Marine Ecological Classification Standard (CMECS) categories displayed at a suitable scale; offshore and onshore cable routes; detailed description of offshore and onshore cable installation methods and associated impacts and proposed mitigation measures; design of the substation and interconnection to the transmission system; and stormwater management measures. The DEIR should identify and describe measures to avoid, minimize and mitigate the project's impacts.

The DEIR should identify and describe state, federal and local permitting and review requirements associated with the project and provide an update on the status of each of these pending actions. It should include a description and analysis of applicable statutory and regulatory standards and requirements, and a discussion of the project's consistency with those standards. Pursuant to the Coastal Zone Management Act, CZM's federal consistency authority extends to activities that have reasonably foreseeable effects on any coastal use or resources resulting from a federal agency activity or federal license or permit activity. Renewable energy leases and related authorizations by BOEM are listed federal actions of the state's approved Coastal Management Program. CZM's federal consistency review will be completed through the federal BOEM renewable energy program and National Environmental Policy Act (NEPA) filings; however, as requested by CZM, the DEIR should describe activities in adjacent federal waters to the extent practicable as well as potential effects on state resources and uses to allow for a more complete assessment of the entire project through this MEPA process. It should include a description of existing conditions and plans for existing and post-development conditions for all project elements, including the WTGs, ESPs, submarine cable, onshore cable, HDD, and land-based facilities. It should clearly describe selected methods of cable installation and the route segments where each method will be used. The DEIR should include a project schedule, describe construction sequencing and describe project phasing.

Alternatives Analysis

The ENF included an analysis of a No Build Alternative, offshore transmission options and alternative cable landing sites, offshore export onshore export cable routes and construction methods. The project is being developed in response to a solicitation for offshore wind energy as a source of electricity for Massachusetts. Therefore, the No Build Alternative, or generation of electricity by means other than offshore wind, would not be consistent with the legislative mandate that required the solicitation and was not reviewed in detail.

Offshore Transmission Options

The OECC was established as the proposed cable route between projects proposed in Lease Areas OCS-A 0501 and OCS-A 0534 and the south shore of Cape Cod during MEPA review of both the VWC1 and NEW1C projects. Comments from Agencies concur with the routing of the VWC2 cables through the OECC and did not recommend that alternate offshore routes be evaluated in the DEIR. However, many commenters questioned why Dowses Beach was selected as the landfall site. The DEIR should include a summary of the alternatives analysis provided during previous MEPA reviews of cable routes extending from the OCS-A 0501 and

OCS-A 0534 Lease Areas, including, as discussed below, alternative landfall locations, and document the rationale for the selection of the OECC as the Preferred Alternative for the offshore export cable route**.** Given the common ownership and interrelationship among the three projects originating from OCS-A 0501 and OCS-A 0534, the DEIR should include a conceptual discussion and accounting of the cumulative impacts of VWC1, NEW1C and NEW2C with respect to the expected total temporary (e.g., dredged areas) and permanent (e.g., cable protection) impacts to the underwater environment across the three construction windows. Consistent with prior reviews, the DEIR should discuss alternatives with respect to construction phasing and schedule and demonstrate that the chosen schedule maximizes opportunities to minimize impacts associated with repeated dredging along the same OECC corridor. The DEIR should discuss whether efforts were made to coordinate construction timing with third party proponents, such as Mayflower Wind, that are also proposing a transmission corridor in proximity to the OECC. The DEIR should include an evaluation of potential construction methods that could minimize cumulative impacts from VWC1, NEW1C and NEW2C and other offshore wind generating facilities by coordinating cable siting and laying, both by the Proponent independently and by the Proponent and other offshore wind development anticipated to occur in a similar geographical area.

The ENF reviewed an alternative that would make use of high voltage direct current (HVDC) technology to deliver electricity. The HVDC Alternative would deliver electricity from the offshore wind generating facility to the electrical grid using HVDC technology, which has been successfully used for long-distance power transmission. This alternative could minimize impacts to the seafloor by installing two cables rather than three and the two cables could potentially be installed within the same trench. However, The HVDC Alternative would have significant impacts associated with the construction of a large converter station (in addition to a substation) on land to convert the power from DC to AC. According to the ENF, the manufacturing capacity for HVDC cables is limited and requires significant lead time that would cause a delay in project commencement. The use of HVAC cables is the Preferred Alternative because they are less costly and more readily available than HVDC cables, do not require a converter station and can adequately convey electricity across the distance between the generating facility and interconnection.

The Shared Transmission Alternative would minimize impacts by combining the offshore transmission systems of two or more offshore wind generating facilities into one system. According to the ENF, the Shared Transmission Alternative is not feasible because the Independent System Operator-New England (ISO-NE) has established a Normal Design Contingency for planning purposes which limits the amount of electricity from a single transmission source to 1,200 MW. As a result, a shared transmission system that could accommodate more than the 1,200 MW proposed by the project would require at least two sets of offshore export cable pairs that would interconnect at two separate points of interconnection involving two separate landfall locations. Therefore, if the project shared a transmission line with another offshore wind generating facility, the number of landfall locations would not be reduced. In addition, the ENF asserts that a shared transmission system would add complexity and delay to each project. The ENF also referenced a 2019 study by the Department of Energy Resources (DOER) which concluded that shared transmission should be considered in connection with future solicitations for offshore wind energy, and that solicitations for a shared transmission only system would have to precede the awarding of contracts for additional offshore wind generating facilities. The DEIR should provide a thorough analysis of the use of shared transmission

infrastructure that could be utilized for electricity generated from Lease Areas OCS-A-0501 and OCS-A-0534, including VWC1, NEW1C and NEW2C. The analysis should compare environmental impacts of a shared option to three separate generator lead lines, as currently proposed for these three projects and review the logistical, operational, financial and engineering feasibility of shared transmission for this and other related projects.

Onshore Cable Route

The ENF identified two onshore export cable route alternatives between the landfall site and the location of the proposed substation, a variation of the onshore routes and three potential routes between the proposed substation and the West Barnstable Substation. It reviewed alternative construction methods for crossing a culvert under the Dowses Beach driveway and Route 6.

Both of the routes from the Dowses Beach landfall site to the proposed substation follow existing roads and ROWs. The cable routing in the Preferred Alternative is 6.7 miles long and follows a generally direct route north to the proposed substation site using East Bay Road, Wianno Avenue, Main Street, Osterville-West Barnstable Road, Old Falmouth Road, Old Stage Road, Oak Street and Service Road, then under Route 6 to the proposed substation site. As described below, this alternative would have temporary impacts on wetland resource areas associated with Dowses Beach, East Bay and stream crossings on Old Falmouth Road and Oak Street.

The second alternative, identified as the Noticed Alternative, is a 6.6-mile long route that follows East Bay Road in a northwesterly direction for 0.7 miles, crosses Main Street, follows Old Mill Road, Bumps River Road and Five Corners Road in a northeasterly direction for 1.7 miles, turns northwest on Lumbert Mill Road for a distance of 1.5 miles to Osterville-West Barnstable Road, from which point it follows the Preferred Alternative route for 2.5 miles to the proposed substation site. In addition to wetland resource areas associated with Dowses Beach and East Bay, the Notice Alternative crosses the Bumps River on Bumps River Road and streams on Lumbert Mill Road, Old Falmouth Road and Oak Street. A portion of the Noticed Alternative is located within Priority habitat of the Water Willow Stem Borer moth. The Main Street Variation provides a link between the Preferred Alternative and Noticed Alternative along a 0.3 mile section of Main Street. According to the ENF, the Main Street Variation would be used if Wianno Road, rather than East Bay Road, were used in the Noticed Alternative.

According to the ENF, both the Preferred Alternative and Noticed Alternative routes are feasible from a cost and engineering perspective. The Preferred Alternative passes through a section of Osterville with more businesses and historic properties, whereas the Noticed Alternative route passes through more residential areas. The Noticed Alternative route is generally closer to the coastline and would be more susceptible to flooding and storm damage under future climate conditions. The Preferred Alternative was selected because it coincides with the route of the Town's planned sewer construction project and would allow for construction activity to be coordinated to minimize impacts by constructing the two projects simultaneously.

I note the concern of many commenters regarding the impacts of Preferred Alternative onshore route through Osterville's commercial and historic districts. The DEIR should provide a detailed description of construction activities through these areas, including duration, timing and

potential relocation of other utilities. It should identify potential impacts of the onshore export cable during the construction and operation phases of the project and describe mitigation measures. The DEIR should provide a detailed analysis of the comparative impacts of the Preferred Alternative route and the Noticed Alternative route. The DEIR should discuss alternative onshore cable routes in the context of the analyses of alternative landfall and substation locations.

Landfall Location

I note that in the DEIR for the NEW1C project, Dowses Beach was rated as a "Less Preferable" location while several other sites were deemed "Promising." The DEIR should provide a comprehensive analysis of all landfall locations evaluated prior to the selection of Dowses Beach. For the "Promising" sites, the DEIR should describe existing conditions and uses of each alternative location, provide conceptual-level plans of landfall alternatives showing how construction staging areas and permanent structures could be accommodated at each site, potential onshore cable routes to the proposed substation or alternative substation locations, and a comparison of impacts associated with each alternative. The DEIR should compare the environmental impacts associated with each landfall site and discuss the reasons for selecting Dowses Beach. The DEIR should evaluate the feasibility of installing conduits of sufficient size at the Craigville Beach location for the NEW1C project to accommodate landfall of the offshore export cables for the NEW2C project. It should identify potential impacts to groundwater, including public water supplies, from project components and identify mitigation measures.

Substation

According to the ENF, the Proponent evaluated potential locations for the proposed substation using a set of screening criteria which included the size of the parcel, proximity to the West Barnstable Substation and landfall location, environmental characteristics, accessibility and cost and availability of the parcel. The DEIR should provide an analysis of alternative substation locations, including at least one location not located above the aquifer. The analysis should estimate the potential environmental impacts of each alternative, quantitatively to the extent possible. It should make note of any implications for onshore routing of the export cables and landfall locations.

Environmental Justice

Effective January 1, 2022, all new projects in a Designated Geographic Area (DGA, as defined in 301 CMR 11.02, as amended) around EJ populations are subject to new requirements imposed by the Chapter 8 of the Acts of 2021: *An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy* (the "Climate Roadmap Map") and amended MEPA regulations at 301 CMR 11.00.[8] Two related MEPA protocols—the MEPA Public Involvement Protocol for Environmental Justice Populations (the "MEPA EJ Public Involvement Protocol") and MEPA Interim Protocol for Analysis of project Impacts on Environmental Justice Populations (the "MEPA Interim Protocol for Analysis of EJ Impacts")—are also in effect for new projects filed

[8] MEPA regulations have been amended to implement Sections 55-60 of the Climate Roadmap Act, and took effect on December 24, 2021. More information is available at https://www.mass.gov/service-details/information-about-upcoming-regulatory-updates.

on or after January 1, 2022.[9] Under the new regulations and protocols, all projects located in a DGA around one or more EJ populations must take steps to enhance public involvement opportunities for EJ populations, and must submit analysis of impacts to such EJ populations in the form of an EIR.

As noted above, the project site is not located within one mile of any EJ populations; therefore, the project is not subject to the EJ outreach and analysis procedures listed above. The EEA EJ Maps Viewer identifies one census tract within a mile of the project in which Portuguese or Portuguese Creole is spoken by 7.1% of residents in the census tract who also identify as not speaking English very well. According to the ENF, the Proponent consulted with the Barnstable Public School District regarding languages spoken by students. Based on this consultation, the Proponent prepared project summaries in Brazilian Portuguese and Spanish as part of its public engagement effort. The project summaries were distributed in advance of the filing of the ENF to an EJ Reference List provided by the MEPA Office that included regional and statewide community-based organizations (CBOs) and tribes/indigenous organizations and to additional CBOs identified by the Proponent. According to the ENF, the Proponent has partnered with the Vineyard Power Cooperative to inform the public and key stakeholders about federal and state renewable energy goals and regulatory processes. The Proponent's outreach efforts have included consultation with stakeholders and community events, including dozens of public information sessions on Cape Cod, Martha's Vineyard and Nantucket.

According to the ENF, construction of the offshore wind farm will require port facilities for laydown space and wind turbine assembly in Salem, MA, New Bedford, MA, Bridgeport, CT and/or New London, CT. According to the ENF, the Proponent intends to lease space from a proposed offshore wind port facility in Salem, which is currently undergoing separate MEPA review (EEA# 16618, Salem Wind Port). The proponent of the Salem Wind Port filed an Expanded ENF (EENF) which reviewed potential environmental impacts, including impacts on EJ populations within the vicinity of the proposed wind port, associated with proposed dredging, construction of infrastructure improvements and operation of the facility. A Certificate on the EENF was issued on November 30, 2022. The Certificate included a Scope for additional analysis that will be provided in a Single EIR. According to the ENF, the Proponent will also require the use of a long-term operations and maintenance (O&M) facility once the wind farm is operational. Potential locations for the O&M facility include Bridgeport, CT, Vineyard Haven, MA, New Bedford, MA and other locations in southeastern Massachusetts.

The DEIR should describe all anticipated work activities at any port facilities and O&M facilities in Massachusetts that will be used to support implementation of the project, including during construction and post-construction operations. The DEIR should discuss whether any new construction or expansion of buildings, docks or infrastructure, or dredging will be required at locations other than the Salem Wind Port, and indicate whether the Proponent or third parties will engage in such activities. If the former, the DEIR should consider all related port and O&M activities as part of the project and provide analysis consistent with the remainder of the Scope. If activities will be conducted by third parties, the DEIR should discuss why those activities should be considered severable from the remainder of this project, and describe the status of any design or permitting of such work activities, whether those other activities are likely to undergo MEPA review, and the mechanism through which the Proponent intends to make use of those

[9] Available at https://www.mass.gov/service-details/eea-policies-and-guidance.

facilities (through long term leases or other legal arrangements). The DEIR should include a conceptual discussion of the nature of anticipated impacts associated with activities at these off-site locations, including anticipated truck and marine vessel traffic, air emissions associated with any industrial or manufacturing processes, and impacts associated with construction period activity. The DEIR should provide a description of the EJ populations and their characteristics within a 1-mile radius of any identified port or O&M facilities.

Ocean Management Plan

The project is subject to review under the OMP. The first OMP was developed in 2009 pursuant to the Oceans Act (Chapter 114 of the Acts of 2008), and subsequently updated in 2015 and most recently in 2021. The OMP identifies and maps important ecological resources that are key components of the state's estuarine and marine ecosystems— defined as "special, sensitive or unique resources" (SSU)—and identifies key areas of water-dependent uses including commercial and recreational fishing and navigation. The OMP contains siting and management standards applicable to specific ocean-based activities to protect SSU resources and water-dependent uses. For cable projects, the OMP identifies the applicable SSUs as core habitat areas for the North Atlantic Right Whale, Fin Whale and Humpback Whale, intertidal flats, eelgrass and areas of hard/complex seafloor. Hard/complex benthic conditions include: exposed bedrock or concentrations of boulder, cobble or similar hard bottom; morphologically rugged seafloor conditions characterized by high variability in bathymetric aspect and gradient, such as sand waves; or artificial reefs, wrecks or functionally equivalent structures that provide a substrate for hard bottom biological communities.

Siting Standards

The siting standards of the OMP and its implementing regulations (301 CMR 28.00) presume that a project alternative located outside mapped SSU resources is a less environmentally damaging practicable alternative than a project located within a mapped SSU resource. The OMP management standards require a demonstration that the project has undertaken all practicable measures to avoid damage to SSUs; and a demonstration that the public benefits of the project outweigh the public detriments to the SSU resource. The DEIR should demonstrate that the project will comply with the management standards by identifying the project purpose and constraints, reviewing alternatives that would avoid SSUs, providing sufficient details of existing and proposed conditions along the proposed cable route, documenting the impacts of the project and mitigation measures to minimize impacts, and addressing its public benefits.

The ENF provided maps of benthic conditions within the OECC prepared based on surveys conducted for the review and permitting of the VW1 and NEW1C projects. The surveys were conducted using video, multi-beam and side-scan sonar, bathymetry and sediment grabs. Mapped benthic conditions condition were presented using both the Coastal and Marine Ecological Classification Standard (CMECS) and the Auster habitat classification method, which was used to describe conditions for the VW1 and NEW1C reviews. According to the results of seafloor mapping, and consistent with maps of SSUs provided in the OMP, the OECC includes areas of hard/complex benthic conditions, as well as extensive areas of soft sediment comprised of sand and mud. For each routing variation, the DEIR should quantify the acreage of seafloor and hard/complex seafloor disturbance associated with the plow or other cable-installation

device, direct impacts from plow skids; vessel impacts, including anchors, jack-up supports and grounding; and long-term cable protection. As requested by CZM, this analysis should be prepared using the Proponent's seafloor mapping and OMP maps of SSUs. Based on this analysis, the DEIR should document how the Proponent will use all practicable measures to avoid disturbing hard/complex seafloor, that no Less Damaging Environmentally Practicable Alternative to the proposed project exists, that the project will cause no significant alteration of SSU resources, and that the public benefits of the project outweigh its detriments.

The OMP includes mapped areas of commercial and recreational fishing and navigation in Nantucket Sound that could be affected by the project. The DEIR should describe activities that could be affected by the installation of the cable and survey activities, including restrictions on navigation, fishing and the placement of fixed or mobile fishing gear. The DEIR should include a Fisheries Communications Plan for alerting mariners of the location and timing of project activities in Nantucket Sound. The Proponent should also coordinate with municipal shellfish constables and aquaculture grant owners to ensure the Project avoids interference with shellfish relay or aquaculture operations.

Ocean Development Mitigation Fee

The Oceans Act established an Ocean Development Mitigation Fee to be assessed for offshore development projects. The purpose of the fee is to compensate the Commonwealth for unavoidable impacts to ocean resources and the broad public interests and rights in the lands, waters and resources of the OMP areas and to support the planning, management, restoration, or enhancement of marine habitat, resources and uses. The fee will be established through the MEPA review of the project's impacts with input from State Agencies and the public. The OMP contains language and guidance as to the process and framework for determining the fee. The information and analysis contained in the DEIR, as well as consultation with agencies and input from public comment, will help to inform the Secretary's determination of the mitigation. If the project is permitted, the fee must be deposited in the Oceans and Waterways Trust. According to the ENF, benefits of the project include generating renewable energy, stabilizing electricity costs, improving the reliability of the electrical grid in Southeastern Massachusetts, and providing economic and employment benefits to the region. The DEIR should demonstrate that the public benefits of the proposed total project outweigh the public detriments to OMP resources as required by 301 CMR 28.00.

Wetlands and Water Quality

As described below, project activities that may impact wetlands include the installation of the offshore export cables, the transition of the cables from the offshore environment to land and construction of the duct bank for the onshore export cables. The DEIR should identify areas of eelgrass in or near areas where project activities are proposed, including the waters off Barnstable and Edgartown, and describe potential impacts from cable laying, offshore dredging and sediment dispersion and HDD operations. The DEIR should provide updated estimates, if necessary, of impacts to wetland resource areas based on any changes to the design of the project or delineation of wetland resource areas. It should provide the data and analysis identified below and review how the project will satisfy the requirements of the Wetlands Regulations (310 CMR 10.00), WQC Regulations (314 CMR 9.00) and the Waterways Regulations (310 CMR 9.00).

Offshore Export Cable Installation

According to the ENF, each offshore export cable will be installed using a tool that simultaneous lays and buries the cable, such as jet plow, or mechanical plow, primarily in soft sediments using a trenching tool. The trenching tool will be mounted on skids and pulled along the bottom by a cable laying vessel. This installation technique will create a 3.3-ft wide trench in which the cable will be buried to a depth of five to eight feet and covered with sediment. In addition to the direct impacts from the trench, the plow skids will directly impact an area of seafloor up to approximately 10 ft wide centered on the trench. In areas where mobile sand waves are present on the ocean floor and cables must be buried deeper than eight feet, either a trailing suction hopper dredge (TSHD) or jetting by controlled flow excavation will be used to dredge a trench with 3:1 (horizontal:vertical) slopes and a bottom width of 50 ft to adequately bury the cables. Dredged sand from these areas will be deposited within the OECC in areas with similar sandy benthic conditions. Where subsurface conditions prevent burial of the cable, it will be placed on the seafloor and covered with protective armoring, which may include rock, gabion rock bags, concrete mattresses or half-shell pipes. According to the ENF, cable protection will be used if the cable is buried less than five feet deep in areas where there is a high risk of damage to the cable from anchor strikes, which is the case in the majority of the OECC, and if the cable is buried less than three feet in any other areas. Cable protection will also be required where the cables cross other cables or pipelines or where a cable joint requires protection. Additional impacts to LUO will occur where vessel anchors or jack-up supports are placed on the seafloor or where vessels come into direct contact with the seafloor under low tide conditions in shallow waters.

Installation of the offshore export cables will impact between 180 acres and 183 acres of LUO, depending on whether any cables are placed within the Western Muskeget Variant route. The seafloor impacts for each activity and routing variation are shown in Table 1.

Table 1. Summary of offshore cable seafloor impacts (acres).

Activity	3 Cables in OECC	2 Cables in OECC + 1 Cable in Western Muskeget Variant	1 Cable in OECC + 2 Cables in Western Muskeget Variant
Cable protection	29.4	32.5	35.6
Cable installation	110	107	104
Additional dredging	27	30	33
Vessel impacts	27	27	26
Total	180	182	183

The DEIR should describe each of the cable installation methods that may be used, identify the conditions along the cable routes under which it may be used, its direct impacts on the seafloor and indirect impacts such as turbidity and sediment dispersion. It should compare the relative impacts of each method and include a commitment to use the least impactful methods or, if the least impactful methods are not feasible under some or all conditions, provide a discussion of why that is the case and additional mitigation measures that will be implemented. In particular, the use of a TSHD for dredging of sand waves will require disposal of dredged material within the OECC that will cause a sediment plume extending beyond the immediate

work area. The DEIR should describe why a TSHD may be used rather than controlled flow excavation, review the results of sediment dispersion modelling and identify potential impacts and mitigation measures from sediment disposal.

The DEIR should explain how the burial depth and sediment cover of the cables will be verified and describe any additional burial or cable protection measures that may be necessary if the cable has not been adequately buried. It should detail procedures, such as a second plow pass or hand jetting. that may be used to achieve adequate burial depth and avoid armoring. It should describe the dimensions and physical characteristics, including habitat value, and installation methods of any armoring that may be required as a last resort. The DEIR should detail the data that will be used, and how it will be collected, to determine high and low-risk vessel traffic areas. These risk areas should be represented on maps depicting the proposed cable routes. The Proponent should consult with CZM, DMF and local stakeholders such as the harbormaster(s) to determine the appropriate criteria for delineating areas of high risk from anchor strikes. The DEIR should identify any infrastructure crossings that may be necessary and the proposed method of cable protection. It should describe any unique impacts that may result from infrastructure crossings, including any increased potential for cables to become unearthed and potential increased impacts from electromagnetic fields and heat.

The DEIR should describe expected transit and work speed of the cable lay vessels, the number and type of support vessels and whether the cable laying vessel will use dynamic positioning or kedging during the cable installation process; the use of dynamically positioned vessels is encouraged as a means of minimizing benthic impacts associated with anchors and anchor lines The DEIR should identify potential mitigation measures appropriate for each construction method and for any permanent impacts, such as habitat conversion from armoring.

The DEIR should describe a comprehensive post-construction monitoring plan developed in consultation with State Agencies. The monitoring plan should establish a robust pre-construction baseline for potentially impacted biota and habitat; evaluate Total Suspended Solids (TSS) dispersion during construction; measure changes in seafloor topography and disturbance of seafloor habitats, including eelgrass; evaluate the adequate burial of the cables in the near and long term; estimate recovery times of resources; colonization of invasive species in disturbed areas; and outline adequate methods and metrics to detect differences in biological or geological parameters within the construction corridor. The DEIR should describe how the post-construction monitoring plan will address these and other relevant factors to protect water resources and species habitat. To the extent the monitoring plan will be modeled on the plan completed for previously-approved cable installation projects (such as VWC1 or NEW1C), a copy of the approved post-construction monitoring plan should be submitted with the DEIR. The DEIR should include a description of how the components of the plan will be adapted for the NEW2C project, including any provisions to account for potential interference in the monitoring program by activities associated with other transmission projects.

Landfall

Installation of the offshore export cables by trenching will cease in waters approximately 1,500 ft from the shoreline at the proposed Dowses Beach landfall site. At this location, a below-ground conduit will be installed between the end of the offshore trench and the landfall site in the beach parking lot using HDD to avoid direct impacts to rare species habitat and wetland resource

areas, including Coastal Beach, Coastal Dune and LSCSF. Each cable will be pulled through the conduit to one of three underground transition vaults, where the nine individual single-core cables (three from each offshore export cable) will be placed within its own conduit in a duct bank and routed to the proposed substation.

The DEIR should detail HDD operations and describe impacts associated with the transition between construction techniques, such as potential release of drilling fluid in wetland resource areas or rare species habitat. It should provide a contingency plan describing measures to minimize and contain turbidity and sedimentation should HDD drilling slurry be released into the environment. The DEIR should detail the duration of HDD activities, restrictions on the use of the beach, fishing pier and parking lot and identify potential mitigation measures.

Onshore Export Cable Installation

The duct bank carrying the onshore export cables will follow a 6.7-mile long route north from Dowses Beach to the site of the proposed substation. It will impact 19,682 sf (0.45 acres) of LSCSF in a 1,514 lf section of the route at Dowses Beach and East Bay Road and 11,336 sf (0.26 acres) of Riverfront Area in two sections (872 lf total) of the route on Old Falmouth Road and Oak Street. According to the ENF, the duct bank will be installed within the Dowses Beach driveway over the culvert connecting East Bay on either side of the road without impacting wetland resources areas.

As noted by MassDEP and CZM, Dowses Beach is a barrier beach consisting of resource areas defined as Coastal Beaches and Coastal Dune. The DEIR should include a delineation of resource areas at Dowses Beach and at stream crossings along the duct bank route and identify any impacts associated with the project, including impacts associated with future maintenance and repair activities. The DEIR should include a map of all wetland resource areas that will be impacted by construction, staging and future maintenance and repair activities, identify mitigation measures to minimize impacts and describe how affected areas will be restored.

Chapter 91 / Waterways

Sections of the export cables in, under or over the flowed tidelands of Nantucket Sound, as well as associated dredging for installation of the cables, will be subject to licensing under c. 91 and the Waterways Regulations. The DEIR should clearly delineate the landward extent of c. 91 jurisdiction, including any filled tidelands along the shoreline and any filled or flowed tidelands along the onshore export cable route. According to MassDEP, the project is a water-dependent industrial use pursuant to 310 CMR 9.12(2)(b)(10) because it is an infrastructure facility that will be used to deliver electricity to the public from an offshore facility located outside the Commonwealth. The DEIR should include a draft Navigation Plan that will be implemented during construction, and subsequent maintenance, repair and decommissioning activities, to minimize conflicts with commercial and recreational vessels. The DEIR should discuss the project's consistency with the applicable c. 91 regulations.

Marine Fisheries

As noted above, Nantucket Sound provides habitat for numerous shellfish and finfish important ecologically and commercially, including channeled whelk, knobbed whelk, longfin

squid, summer flounder, windowpane flounder, scup, surf clam, sea scallop, quahog, horseshoe crabs and blue mussel. The DEIR should include sufficient information about existing conditions along and adjacent to the proposed cable route to determine potential impacts to marine species and their habitat. It should assess the impacts of the cable on commercial and recreational fishing activities, including impacts that will accrue during the installation of the cable. According to DMF, installation of the offshore export cable will likely impact sessile marine resources such as shellfish, whelks and quid eggs; therefore, the DEIR should document the distribution of these vulnerable species using up-to-date trawl survey data and other available data, and identify mitigation measures to minimize impacts.

The DEIR should review impacts associated with the operation and maintenance of the cable, including cable repair or monitoring activities, placement or maintenance of protective covering, and decommissioning. It should include an analysis of potential impacts associated with electromagnetic fields and heat and identify mitigation measures and a monitoring procedure. It should address establishment of time of year (TOY) restrictions and other mitigation measures to minimize impacts to species and habitats and continue to work with DMF to develop cable installation methods that minimize impacts to the squid fishery in state waters.

The DEIR should provide an analysis of the project's impacts to commercial and recreational fishing activity. It should provide background and contextual information from federal review processes to inform this state review. It should provide information on efforts made to address and mitigate impacts to commercial and recreational fisheries through federal review processes, including a description of outreach conducted with Massachusetts fishermen and other Massachusetts stakeholders and mitigation approaches that have been adopted or are being considered. The DEIR should describe the planned timing of cable-laying activities with regards to co-occurring marine resources and stakeholders and identify potential prohibition or relocation of fishing (fixed or mobile gear) for any length of time as a result of survey, installation, or repair procedures. The size, length, and potential economic impact of closures should be included in the description. The DEIR should provide an analysis of the predicted economic exposure to Massachusetts fishermen from the construction, operation, and decommissioning of the OECC in Massachusetts waters and propose a financial mitigation package to compensate fishers for lost revenue. The Proponent should consult with CZM and DMF prior to completing this analysis.

Rare Species

According to NHESP, Massachusetts is a globally significant nesting, feeding, staging and overwintering area for numerous migratory birds. The state's natural resources support almost 40 percent of the Atlantic coast breeding population of Piping Plover and approximately 50 percent of the North American Roseate Tern population, as well as significant nesting colonies of Common and Least terns. State-listed species of terns forage in waters surrounding Massachusetts, including areas in or near the OECC and proposed wind farm location outside of state waters. In addition, Dowses Beach is mapped as Priority Habitat for Piping Plover and Least Tern.

The DEIR should assess the direct and indirect impacts of the project on state-listed and migratory birds in the project area and identify mitigation measures as described below. As requested by NHESP, the DEIR should include site-specific details regarding construction and

restoration timelines and the nature of the project's temporary and permanent impacts on rare species habitat on Dowses Beach. In addition, it should provide a proposed a Piping Plover Protection Plan so that NHESP can assess whether the project can avoid both temporary and permanent impacts to state-listed plovers and terns and their habitats. The DEIR should provide additional details regarding potential impacts to rare species habitat along the Old Mill Road Alternative onshore export so that NHESP can determine whether the activity may qualify for an exemption from the Massachusetts Endangered Species Act (MESA) regulations applicable to projects located entirely within public roadway layouts.

In connection with the Vineyard Wind and Park City Wind projects, a framework was developed for a post-construction monitoring program for offshore birds and bats that includes acoustic monitoring, deployment of up to 150 tags per year for three years and installation of tagging receivers to detect tagged Roseate Terns, Common Terns and other migratory birds, count surveys at the wind turbines and preparation of annual monitoring reports. As noted in the FEIR Certificate for the NEW1C project, the bid for the Commonwealth Wind project in the Massachusetts Section 83C III solicitation for offshore wind energy generation that was accepted by the Commonwealth on December 17, 2021 included a commitment to implement a conservation program to research and address impacts of offshore wind development on coastal waterbird populations. The program will include research, conservation, and habitat restoration measures for avian populations that nest, forage, or migrate through offshore wind project areas. Potential conservation measures identified by NHESP to mitigate impacts to avian species include support for ongoing tern colony and plover monitoring and management and the restoration and enhancement of critical nesting habitats. The Proponent should coordinate with the NHESP and other state agencies to develop the specifics of the program including partners, funding, timing, and specific projects and provide additional details of its proposed mitigation program in the DEIR. The development of the coastal waterbird conservation program will also be reviewed as part of CZM's ongoing federal consistency review process. I note that prior reviews of affiliated projects for Vineyard Wind and Park City Wind concluded without a clear commitment for mitigation in relation to avian impacts. In light of the explicit commitments made as part of the Section 83C III solicitation, it is my expectation that the details of this mitigation will be fully described in future filings for this project.

Substation and Interconnection

A new substation is required to step up the 275-kV voltage of the onshore export cable to 345 kV so it can be interconnected to the electrical transmission system. The substation will be constructed on a 15.2-acre parcel located off Oak Street and north of Route 6. The site is located within an Aquifer Protection Overlay District but not within a Zone II Wellhead Protection Area for a public water supply. Construction of the substation will alter approximately 12.4 acres of undeveloped land at the site and add 1.2 acres of impervious area. The ENF included a plan showing the layout of the proposed substation, which will include transformers, switchgear and a control room inside two metal enclosures and associated equipment and wiring. It will be enclosed by a perimeter fence and include a driveway connection to the road providing access to DCR's fire tower. The substation will be designed as a gas-insulated substation (GIS), which uses sulfur hexafluoride (SF_6), a potent greenhouse gas, to insulate electrical equipment.

To minimize potential impacts to groundwater, the substation will have a containment system designed to contain 110 percent of the volume of dielectric fluid anticipated to be used

within the transformers and other equipment. The substation will also be designed with additional containment volume to accommodate additional flow from precipitation under an extreme rain event. The Proponent will develop and implement a construction-period Spill Prevention, Control and Countermeasures Plan (SPCC) to minimize the potential for a release of fuel or other contaminants that could impact water quality. The site will include a stormwater management system designed to meet the requirements of the Massachusetts Stormwater Management Standards (SMS)./ The stormwater management system will include the use of Best Management Practices (BMP) and Low Impact Design (LID) measures such as perforated underdrains, a riprap-lined swale, two attenuation/detention basins, a hydrodynamic separator, a sediment forebay and an infiltration basin to remove pollutants and maintain predevelopment peak discharge rates.

The DEIR should provide additional details on the design of the proposed substation, including buffers, noise abatement features and the stormwater management system. It should describe proposed modifications to the West Barnstable Substation, and clarify the responsible parties for implementing these modifications. The DEIR should evaluate the feasibility of constructing an air-insulated (AIS) substation to avoid the use of SF_6 gas for insulating the substation. It should discuss compliance with MassDEP's regulations capping emissions from SF_6 gas at 310 CMR 7.72. It should describe how groundwater will be protected from potential contaminants, including provision of full containment of all fluids within substation equipment. The DEIR should describe project activities within the Route 6 ROW, identify the need for road closures or other impacts to traffic on Route 6 and review any requirements that MassDOT may impose on construction of the project.

According to DCR, **t**he Barnstable Fire Tower is staffed during the fire season, from March through October, and tower operators work to detect wildland fires in the Upper Cape region. The operators of the Barnstable Fire Tower play a key role in facilitating communications between regional fire towers and municipal fire departments. The DEIR should describe potential impacts to the fire station from the construction and operation of the substation. It should demonstrate that the substation will not restrict access to the fire tower, obstruct views from the tower or adversely affect radio communications from the fire tower. The DEIR should provide details regarding the Proponent's rights to use the fire tower access road and, if such rights exist, include a plan for the use of the access road, both during and after construction. The Proponent should consult with DCR regarding the potential need for a Construction and Access Permit for use of the fire tower access road.

Cultural Resources

Both offshore and onshore components of the Project are located in areas with significant cultural resources associated with ancient and historic period Native American activities and colonial settlement. In addition to the high density of shipwrecks, coastal waters affected by the project may include submerged ancient Native American cultural resources. According to BUAR, a marine archaeological reconnaissance survey of the state waters portion of the OECC for the VWC1 project determined that the offshore component of the waters within and in the vicinity of the OECC possessed a high density of post-contact period shipwrecks and contained numerous areas of submerged paleolandscapes with archaeological sensitivity for potentially containing submerged Native American archaeological deposits. Therefore, the project area may

be archaeologically sensitive for both pre- and post-contact period (principally shipwrecks) underwater archaeological resources.

According to BUAR, the NEW2C cable route may be generally archaeologically sensitive for both pre-contact period and post-contact period (principally shipwrecks) underwater archaeological resources because it will be primarily located within the same OECC as the VWC1 cables and because of Nantucket Sound's status as a National Register of Historic Places-eligible Traditional Cultural Property (TCP) considered significant for the region's Wampanoag Tribes.

Underwater archaeological resource identification surveys, site examinations, responses to unanticipated discoveries, and any mitigation activities conducted for the project within the Commonwealth's waters must conform to the MBUAR statute and regulations and published Policy Guidance on Archaeological Investigations and Related Survey Standards for the Discovery of Underwater Archaeological Resources and Policy Guidance for the Discovery of Unanticipated Archaeological Resources and be conducted under an MBUAR Special Use Permit. The Proponent should consult with BUAR to develop a project-specific proposal for complete marine archaeological identification survey coverage for the entire state waters portion of the NEW2C cable route's area of potential effect. The DEIR should provide a discussion of any surveys or analyses that will be undertaken and include a plan consistent with the BUAR's Policy Guidance for the Discovery of Unanticipated Archaeological Resources. The DEIR should report on any consultation conducted with MHC regarding historical and archaeological resources.

Article 97 and Conservation Land

According to the ENF, the project landfall site at Dowses Beach, including the beach, parking area and driveway, and land located on two of the alternative routes between the proposed substation and the West Barnstable Substation, are protected by Article 97. The DEIR should clearly identify all project activities and structures located on or under Article 97-protected land and provide plans of the affected parcels. It should identify whether any maintenance easements will be required on protected land, and describe potential maintenance and repair activities.

A change in use of Article 97 land requires a 2/3 vote of the legislature and compliance with the Executive Office of Energy and Environmental Affairs (EEA) Article 97 Land Disposition Policy (Article 97 Policy). A primary goal of the Policy is to ensure no net loss of Article 97 lands under the ownership and control of the Commonwealth. Allowances are made within the Policy for exceptional dispositions. If the project requires conversion of Article 97 land, the DEIR should include an analysis of the six criteria identified in the Article 97 Policy for determining when "exceptional circumstances" exist such that a disposition of Article 97 land may be appropriate:

- The Proponent of the disposition must conduct an analysis of alternatives, commensurate with the type and size of the proposed disposition, that achieve the purpose of the disposition without the use of Article 97 land, such as the use of other land available within the appropriate market area;

- The disposition of the subject parcel and its proposed use may not destroy or threaten a unique or significant resource (e.g., significant habitat, rare or unusual terrain, or areas of significant public recreation);
- Real estate of equal or greater value, and of significantly greater resource value is granted to the disposing agency;
- The minimum necessary area of Article 97 should be included in the disposition and the existing resources continue to be protected to the maximum extent possible;
- The disposition serves an Article 97 purpose or another public purpose without detracting from the mission, plans, policies and mandates of EEA and its appropriate department or division; and,
- The disposition is not contrary to the express wishes of the person(s) who donated or sold the parcel or interests to the Commonwealth.

As noted above, many commenters object to the use of Dowses Beach as the landfall location. The DEIR should provide a detailed description of proposed construction activities, permanent structures and long-term maintenance and repair activities. It should describe any temporary and permanent impacts to public use of any land protected by Article 97, including affected areas and duration of impacts. It should identify mitigation measures to minimize disruption of the public's use of the beach.

Climate Change

Executive Order 569: Establishing an Integrated Climate Change Strategy for the Commonwealth was issued on September 16, 2016. The Order recognizes the serious threat presented by climate change and direct Executive Branch agencies to develop and implement an integrated strategy that leverages state resources to combat climate change and prepare for its impacts. The urgent need to address climate change was again recognized by Governor Baker and the Massachusetts Legislature with the recent passage of St. 2021, c. 8, An Act Creating a Next Generation Roadmap for Massachusetts Climate Policy, which sets a goal of Net Zero emissions by 2050. I note that the MEPA statute directs all Agencies to consider reasonably foreseeable climate change impacts, including additional greenhouse gas emissions, and effects, such as predicted sea level rise, when issuing permits, licenses and other administrative approvals and decisions. M.G.L. c. 30, § 61.

Greenhouse Gas (GHG) Emissions

This Project is subject to review under the May 5, 2010 MEPA GHG Policy because it exceeds thresholds for a mandatory EIR. The DEIR should identify features of the transmission line and substation that will minimize line losses, such as the use of premium efficiency substation transformers and other components. The DEIR should identify mitigation commitments to reduce construction period carbon dioxide (CO_2) emissions and identify construction practices and/or design features that will minimize the leakage of SF_6 gas, a potent GHG. As noted, the DEIR should include a review of potential benefits associated with constructing an AIS substation to avoid the need for SF_6. The DEIR should discuss compliance with 310 CMR 7.72. The DEIR should discuss and quantify the GHG emissions benefits that will accrue to the regional grid from construction of the project (including the offshore wind

generator) through the displacement of fossil fuel sources, including, to the extent feasible, a quantification of benefits accruing to the Commonwealth.

Adaptation and Resiliency

Effective October 1, 2021, all MEPA projects are required to submit an output report from the MA Climate Resilience Design Standards Tool prepared by the Resilient Massachusetts Action Team (RMAT) (the "MA Resilience Design Tool"),[10] to assess the climate risks of the project. The output report attached to the ENF identified a useful life of the project as 33 years which would appear to be too short for a critical infrastructure project of this size. Based on the output report attached to the ENF, the onshore export cables have a high exposure rating based on the project's location for sea level rise/storm surge, extreme precipitation (urban flooding) and extreme heat, and the substation has a high exposure rating based on the project's location for sea level rise/storm surge, extreme precipitation (urban flooding and riverine flooding) and extreme heat. Based on the 33-year useful life and the self-assessed criticality identified for the proposed substation, the MA Resilience Design Tool recommends a planning horizon of 2050 and a return period associated with a 200-year (0.5 percent chance) storm event for designing the substation relative to sea level rise/storm surge and a 50-year (2 percent chance) storm event for extreme precipitation. For the onshore cables, the Tool recommends a planning horizon of 2050 and a return period associated with a 100-year (1 percent chance) storm event for designing the cables relative to sea level rise/storm surge and a 25-year (4 percent chance) storm event for extreme precipitation. The recommendations for onshore cables appear to be based on a "Moderate" criticality assessment, as compared to "High" criticality for the substation. Given the importance of this project to support energy needs for the region and support renewable energy targets, a consistent approach of evaluating all project components as "High" criticality assets appears more appropriate. A longer planning horizon of 40 to 60 years is also recommended, and longer for any underground infrastructure that is unlikely to be relocated.[11]

The Dowses Beach landfall location and the onshore export cable route across the causeway are low-lying, with low-lying beach and dune systems located seaward of the parking lot and driveway. As a result, the landing location and cable routes are vulnerable to erosion and overwash in moderate to major coastal storms. The DEIR should further describe the vulnerabilities of the proposed project and how the project was designed to minimize and reduce risk from coastal effects.

According to the ENF, the Massachusetts Shoreline Change data was reviewed and applied to the proposed project. However, as noted by CZM, shoreline change data is not a useful data source for quantifying the vulnerability of the project shoreline to coastal erosion in moderate to major coastal storms due to the infrequency of these storm events in this area. The primary vulnerability of south-facing shorelines in Massachusetts is to hurricanes. Since the shoreline change data set averages change over a long time horizon and the major hurricanes that cause changes to the shoreline occur once every 75-100 years, the actual effects of these infrequent but impactful storms may be artificially reduced.

[10] https://resilientma.org/rmat_home/designstandards/
[11] See https://eea-nescaum-dataservices-assets-prd.s3.amazonaws.com/cms/GUIDELINES/V1.2_SECTION_2.pdf (at p. 12).

As critical infrastructure, the proposed energy-producing facility should be designed, at minimum, to continue operating through a moderate to a major hurricane (i.e., the current 500-year storm). As noted, the Resilience Design Tool recommends planning for a 200-year storm event under future climate conditions. As requested by CZM, the DEIR should include an analysis of likely nearshore, beach, and dune erosion at the preferred landing site to ensure the cables and associated infrastructure maintain adequate burial depth over the design life of the project; potential impacts to the cable route as a result of erosion and storm surge; potential effects of back-to-back storms, such as Hurricanes Carol and Edna in 1954; and the extent of future flood zones including sea level rise using best available information as provided through the Massachusetts Coast Flood Risk Model (MC-FRM) in 2030, 2050, and 2070. Although the outputs from the MA Resilience Design Standards Tool delineate the potential extent of flood zones with sea level rise, the outputs do not account for the effects of erosion or other landform change. These should be evaluated by the Proponent separately. The MA Resilience Design Tool output report included in the ENF was run in prior to the most recent version of the Tool, which now provides flood depths and water surface elevations for the scenario years for this project. Based on the outcome of the analysis described above, the DEIR should include an analysis of whether alternative designs, locations and/or mitigation may be necessary to ensure the proposed infrastructure continues to operate for the life of the project.

The DEIR should discuss how the project will incorporate comprehensive resiliency planning, given the location of onshore infrastructure directly on the coastline and the potential effects of increased intensity storm and heat events in other areas. The DEIR should identify, in particular, the planning horizon and recurrence intervals used to design the project, and should address 50-year, 100-year and 200-year storm scenarios in 2050 and 2070 to the extent data are available. The numeric values now available through the MA Resilience Design Tool can be consulted as a resource. The DEIR should describe how particular project components have taken into account climate change data and projections in their design, and should specifically address the sizing of the stormwater management system, conduit burial depths, and elevation of above ground infrastructure such as the substation relative to the storm scenarios referenced above.

As noted above, the Proponent will design the containment system at the proposed substation with sufficient capacity to contain dielectric fluid mixed with precipitation from an extreme storm event. The DEIR should review the climate change assumptions used to size the containment and stormwater management systems at the proposed substation and evaluate the need for upgrades to the West Barnstable Substation. It should clearly identify the recurrence interval and planning horizon used to inform design, and how climate change data and projections have been incorporated into these design parameters. The DEIR should discuss whether other onshore components away from the coast will be vulnerable to climate change and intense storm or heat events, and, if so, what efforts were made to design those components to maximize climate resiliency.

Construction Period

The project must comply with MassDEP's Solid Waste and Air Pollution Control regulations. The DEIR should discuss the use of alternative types of equipment for the construction of all, or part, of the project that may serve to reduce land alteration and the clearing required to accommodate construction access. The DEIR should describe potential construction

period impacts (including but not limited to traffic management, materials management, parking, air quality and noise impacts) and outline feasible measures that can be implemented to eliminate or minimize these impacts in a draft Construction Management Plan (CMP). The draft CMP should identify construction access and truck traffic routes, staging areas, and how passive recreation use located adjacent to or along portions of the corridor will be safely maintained or impacted throughout the construction period.

I encourage the Proponent to adopt measures to reduce air quality impacts from certain categories of construction vehicles. The DEIR should provide information on the emission controls that will be used for all on-site construction vehicles and should provide a discussion on using construction equipment with engines manufactured to Tier 4 federal emission standards or best available control technology (BACT). I remind the Proponent that EPA has mandated that Ultra Low Sulfur Diesel (ULSD) fuel be used in all off-road construction equipment. The DEIR should confirm that the project will require its construction contractors to use ULSD fuel in off-road equipment and indicate whether it will incorporate additional measures to minimize construction-period emissions. The DEIR should address how the project will support compliance with the Massachusetts Idling regulation at 310 CMR 7.11.

The Proponent is advised that excavating, removing, and/or disposing of contaminated soil, pumping of contaminated groundwater, or working in contaminated media must be done under the provisions of M.G.L. c. 21E and the Occupational Safety and Health Act (OSHA). If oil and/or hazardous material are identified during the implementation of the project, notification pursuant to the MCP must be made to MassDEP, if necessary. A Licensed Site Professional (LSP) should be retained for this project given the potential impact of MCP-regulated sites on the proposed construction activities. The LSP may evaluate whether risk reduction measures are necessary to mitigate the presence of contamination. The DEIR should include a Spills Contingency Plan that identifies procedures for the containment and cleanup of any releases of hazardous materials.

Mitigation and Draft Section 61 Findings

The DEIR should include a separate chapter summarizing all proposed mitigation measures including construction-period measures. This chapter should also include a comprehensive list of all commitments made by the Proponent to avoid, minimize and mitigate the environmental and related public health impacts of the project, and should include a separate section outlining mitigation commitments relative to EJ populations. The filing should contain clear commitments to implement these mitigation measures, estimate the individual costs of each proposed measure, identify the parties responsible for implementation, and contain a schedule for implementation. The list of commitments should be provided in a tabular format organized by subject matter (traffic, water/wastewater, GHG, environmental justice, etc.) and identify the Agency Action or Permit associated with each category of impact. Draft Section 61 Findings should be separately included for each Agency Action to be taken on the project. The filing should clearly indicate which mitigation measures will be constructed or implemented based upon project phasing to ensure that adequate measures are in place to mitigate impacts associated with each development phase.

To ensure that all GHG emissions reduction measures adopted by the Proponent as the Preferred Alternative are actually constructed or performed by the Proponent, the Proponent

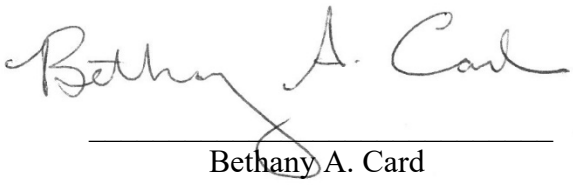
must provide a self-certification to the MEPA Office indicating that all of the required mitigation measures, or their equivalent, have been completed. The commitment to provide this self-certification in the manner outlined above shall be incorporated into the draft Section 61 Findings included in the DEIR.

Responses to Comments

The DEIR should contain a copy of this Certificate and a copy of each comment letter received. It should include a comprehensive response to comments on the ENF that specifically address each issue raised in the comment letter; references to a chapter or sections of the DEIR alone are not adequate and should only be used, with reference to specific page numbers, to support a direct response. This directive is not intended to, and shall not be construed to, enlarge the Scope of the DEIR beyond what has been expressly identified in this certificate.

Circulation

The Proponent should circulate the DEIR to each Person or Agency who previously commented on the ENF, each Agency from which the Project will seek Permits, Land Transfers or Financial Assistance, and to any other Agency or Person identified in the Scope. Per 301 CMR 11.16(5), the Proponent may circulate copies of the EIR to commenters in CD-ROM format or by directing commenters to a project website address. However, the Proponent must make a reasonable number of hard copies available to accommodate those without convenient access to a computer and distribute these upon request on a first-come, first-served basis. The Proponent should send correspondence accompanying the digital copy or identifying the web address of the online version of the DEIR indicating that hard copies are available upon request, noting relevant comment deadlines, and appropriate addresses for submission of comments. If submitted in hard copy, the DEIR submitted to the MEPA office should include a digital copy of the complete document. A copy of the DEIR should be made available for review at the Osterville, Edgartown, Mashpee and Nantucket public Libraries.



December 9, 2022
Date

Bethany A. Card

Comments received:

01/29/2022 Cape Cod Chamber of Commerce
10/13/2022 Susanne H. Conley
10/14/2022 Sally Edmonds
10/17/2022 Lauren Howard
10/19/2022 Town of Barnstable
10/27/2022 Association to Preserve Cape Cod
11/08/2022 Stephen Fratalia
11/17/2022 Jane E. Hattemer-Stringer
11/18/2022 Carole Maguire

11/18/2022	James Paterson
11/18/2022	Patricia Harnois
11/19/2022	John Hauser
11/19/2022	Mary-Gaines Standish
11/19/2022	Scott McLane
11/20/2022	Paul Richards
11/20/2022	Stephen Waller
11/20/2022	The Gerdy Family
11/22/2022	Debbie Barlow
11/22/2022	Martha Curley
11/22/2022	Mary M. McMillan
11/23/2022	Massachusetts Department of Environmental Protection (MassDEP)/Southeast Regional Office (SERO)
11/23/2022	Susanne Conley on behalf of Save Greater Dowses Beach
11/25/2022	Susan O'Brien McLean
11/26/2022	Jack R. Cohen
11/26/2022	Maria and Greg Gerdy
11/27/2022	Maria Gerdy and Family
11/28/2022	Brian and Cindy Dacey
11/28/2022	Carol Zais
11/28/2022	Division of Marine Fisheries (DMF)
11/28/2022	Don and Karen Megathlin
11/28/2022	Edward McCormack
11/28/2022	Hector Guenther
11/28/2022	Joseph J. Conway and Patricia A. Conway
11/28/2022	Peter Hansen
11/28/2022	Senator Julian Cyr, Cape and Islands District Senator Susan L. Moran, Plymouth and Barnstable District Representative Sarah K. Peake, 4th Barnstable District Representative Timothy R. Whelan, 1st Barnstable District Representative Kip Diggs, 2nd Barnstable District Representative David T. Vieira, 3rd Barnstable District Representative Steven Xiarhos, 5th Barnstable District Representative Dylan Fernandes, Barnstable, Dukes and Nantucket District
11/28/2022	Tom and Terry McElligot
11/28/2022	Town of Barnstable
11/28/2022	Vineyard Power
11/28/2022	Wendy Cohen
11/29/2022	Cape Cod Technology Council
11/29/2022	Catherine Bean
11/29/2022	Cape Cod Commission
11/29/2022	Claire O'Connor
11/29/2022	Daphne Northrup
11/29/2022	Department of Conservation and Recreation (DCR)
11/29/2022	Environmental League of Massachusetts and 15 co-signers
11/29/2022	Maria Gerdy and Family
11/29/2022	Marie C. Taylor
11/29/2022	Osterville Village Association/Osterville Business and Professional Association

11/29/2022 Peggy Rowland
11/29/2022 Stacey Guenther
11/30/2022 Conor Paterson
11/30/2022 Massachusetts Office of Coastal Zone Management (CZM)
11/30/2022 Jerome Miranowski
11/30/2022 Jerome Vigil
11/30/2022 Natural Heritage and Endangered Species Program (NHESP)
12/05/2022 Board of Underwater Archaeological Resources (BUAR)
12/06/2022 Cape Cod Climate Change Collaborative
12/06/2022 John Crow
12/06/2022 Stacey Guenther

November 29, 2022

Mr. Alex Strysky, Environmental Analyst
Massachusetts Environmental Policy Act Office
100 Cambridge Street
Boston, MA 02114

RE: New England Wind 2 Connector (EEA No. 16611)

Dear Mr. Strysky,

I write to lend my voice in support of the Commonwealth Wind project, along with its grid interconnection in Barnstable (New England Wind 2 Connector). I thank you for your consideration of my letter and for soliciting public feedback regarding this project.

As I understand it, this is AVANGRID's third such offshore wind project underway in Massachusetts. Commonwealth Wind is not dissimilar to the previous projects that have proposed landings in Barnstable (Vineyard Wind 1 and Park City Wind) and in fact will use a similar route under the seabed, will use the same horizontal directional drilling installation process, and will connect to the energy grid in Barnstable via a cable landing under the Dowses Beach parking lot.

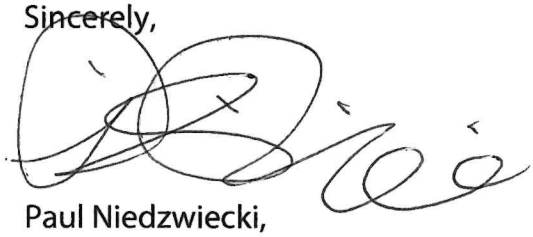
Grid-scale offshore wind development has been long overdue in Massachusetts. Commonwealth Wind will generate more than 1,200 megawatts of clean energy directly to New England's grid. This infusion of energy will help shield New Englanders from the volatility of the winter energy price surges. It is also a critical step towards meeting newly state mandated carbon emissions reduction benchmarks starting in 2030.

1,200 megawatts are enough to power 700,000 homes, a large chunk of our overall power need in the state. This is energy our grid desperately needs. Additionally, Commonwealth Wind will reduce greenhouse gas emissions equal to taking 460,000 internal combustion engine cars off the road each year. Without successfully bringing online offshore wind, Massachusetts will undoubtedly fail to meet its greenhouse gas reductions as well as other targeted clean energy goals.

I have complete confidence that AVANGRID will carefully do all the required due diligence pertaining to environmental safety and impacts regarding their landing under the Dowses Beach parking lot. Thus far they have proven to be actively seeking input from stakeholders and have assured the public through this filing that there will be no construction within the beach, dunes and marsh, and that all construction will be limited entirely to paved areas under the parking lot at Dowses Beach.

I urge you to approve New England Wind 2 Connector.

Sincerely,



Paul Niedzwiecki,
Chief Executive Officer

From: MEPA (EEA)
To: Strysky, Alexander (EEA)
Cc: Kim, Tori (EEA)
Subject: Fw: New England Wind 2 Connector
Date: Thursday, October 13, 2022 9:32:31 AM

From: S.O.B. Save Our Beach <saveourbeach22@gmail.com>
Sent: Wednesday, October 12, 2022 9:52 AM
To: MEPA (EEA) <mepa@mass.gov>
Cc: Susanne Conley <Suconley717@gmail.com>
Subject: New England Wind 2 Connector

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Sir or Madam:

I write on behalf of the *ad hoc* activist group "Save Greater Dowses Beach" to request a 60 day extension of the public comment period for the Environmental Notification Form submitted under the name New England Wind 2 Connector by Epsilon Associates Inc.

The reasons for this request being:

Widespread public awareness of the proposed electrical cable transmission project at Greater Dowses Beach in the Town of Barnstable has developed very recently. Evidence indicates a) the proponent and Barnstable officials did not adequately and in a timely manner involve the local community and its representatives in initial and ongoing discussions regarding the use of Greater Dowses Beach for such a project, and b) the proponent has substantially mis-represented aspects of the proposed project's route, environmental impact, and effect on handicapped accessibility, thereby creating the need for a comprehensive response for which more time than is available is needed.

Our group will be submitting Public Comment no later than October 27, 2022 should this request not be granted, but we hope for your favorable decision.

Respectfully,

Susanne H. Conley
Osterville, MA
ph: 508 922 4342

From: MEPA (EEA)
To: Strysky, Alexander (EEA)
Subject: Fw: Avangrid"s Osterville Landing
Date: Friday, October 14, 2022 3:34:26 PM

From: Sally Edmonds <sally@edmonds.com>
Sent: Friday, October 14, 2022 1:36 PM
To: MEPA (EEA) <mepa@mass.gov>
Subject: Avangrid's Osterville Landing

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As a homeowner for over 60 years I wish to lend my support to Avangrid's Dowses Beach landing location. It is obviously the best of the options and will hopefully bring a sewer line to Osterville.
Sally Edmonds

From: MEPA (EEA)
To: Strysky, Alexander (EEA)
Subject: Fw: New England wind 2 connector
Date: Monday, October 17, 2022 3:43:03 PM

From: Lauren Howard <lpartelow1@gmail.com>
Sent: Monday, October 17, 2022 2:51 PM
To: MEPA (EEA) <mepa@mass.gov>
Subject: New England wind 2 connector

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

I am a full time resident of Osterville. I walk on a daily basis in town and Dowses Beach is on my route. This beach is a treasure to be enjoyed by Osterville residents and not spoiled by the routing of cables for the Avanstar wind farm! The precious causeway to the beach parking and the two bays on either side would be spoiled, perhaps, permanently by this development. The route through town would destroy the village center.

Cables such as what is proposed should be placed in industrial areas, not in our little village and beach.

Lauren Howard
17 David St
Osterville MA

Sent from my iPhone

TOWN OF BARNSTABLE

OFFICE OF TOWN ATTORNEY

367 Main Street
Hyannis, Massachusetts 02601-3907
Phone 508-862-4620
FAX 508-862-4782

KAREN L. NOBER, Town Attorney
CHARLES S. McLAUGHLIN, Jr., Senior Counsel
KATHLEEN CONNOLLY, Assistant Town Attorney

karen.nober@town.barnstable.ma.us
charles.mclaughlin@town.barnstable.ma.us
kathleen.connolly@town.barnstable.ma.us

October 19, 2022

VIA Email: mepa@mass.gov

Secretary Bethany A. Card
Executive Office of Energy and Environmental Affairs
Attn: MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

Subject: New England Wind 2 Connector
Environmental Notification Form (ENF)

Dear Secretary Card:

On behalf of Barnstable Town Manager, Mark S. Ells, this is to express the Town's concurrence with Commonwealth Wind's request for a 30 day extension of the comment period for its ENF filing and to independently ask for the same extension of time.

Given the complexities, size, and environmental considerations attendant to the project, and the time necessary to have as much internal and public input as possible, we believe that the interests of all parties and agencies will be well-served by such an extension.

Sincerely,

Charles S. McLaughlin, Jr.
Senior Counsel

CSM/mf

cc: Mark S. Ells, Town Manager

Andrew Gottlieb
Executive Director

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Blue Magruder

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Wendy Northcross

Kris Ramsay

Robert Summersgill

Charles Sumner

Taryn Wilson

October 27, 2022

Secretary Bethany A. Card
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 Environmental Notification Form, EEA #16611

Dear Secretary Card:

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.

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 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 2 Connector, which is the portion of the Commonwealth Wind project under Massachusetts regulatory jurisdiction, is the largest renewable energy project proposed in the New England region and fills a major role in achieving Massachusetts' commitment to offshore wind energy production. The project will provide 1,232 megawatts of clean energy, which will reduce ISO-NE CO_2e 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

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Energy & Environmental Affairs
(https://www.mass.gov/orgs/executive-office-of-energy-and-environmental-affairs)
Public Comments Portal

alexander.strysky@mass.gov

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Comment Details

EEA #/MEPA ID	First Name	Address Line 1	Organization
16611	Stephen	58 King Arthur Drive	--
Comments Submit Date	**Last Name**	**Address Line 2**	**Affiliation Description**
11-8-2022	Fratalia	--	Individual
Certificate Action Date	**Phone**	**State**	**Status**
11-29-2022	--	MASSACHUSETTS	Opened
Reviewer	**Email**	**Zip Code**	
Alexander Strysky (857)408-6957, alexander.strysky@mass.gov	Stevefratalia@gmail.com	02655	

Comment Title or Subject

Topic: Opposition to Dowses Beach as an entry point

Comments

Segoe UI | 10 pt | Paragraph

One of the reasons my wife and I moved to the area was because of beautiful Dowses Beach and Osterville Village. Of all the Massachusetts coast available for this project they want destroy this sanctuary... how ill-conceived and inconsiderate... take this project to someplace where it will not cause such environmental and economic destruction. Someplace that embraces the project. 95% of the Osterville community will be opposed to this invasion once they learn of the details as it has been embraced by Town officials only who want to proceed in secrecy and in doing so are not embrace the will of the people who voted for them. This will cost them politically as the overwhelming majority that oppose this project will remember this misrepresentation when it is election time. Take the Wind Project elsewhere where it will have MINIMAL IMPACT and where it will be embraced. It is NOT EMBRACED or SUPPORTED by the Community of Osterville....

Attachments

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Status

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From: Jane Hattemer-Stringer
To: Strysky, Alexander (EEA)
Subject: Dowses Beach cable - my comment
Date: Thursday, November 17, 2022 10:43:55 AM

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Hello Alexander, I was there at the meeting last night, November16, 2022 at the Osterville Library. I am a resident of Osterville. I am thrilled that this project will be going forward. I am thrilled that it is being so carefully planned. I got alot of information from you and from the other presenters whom I heard. I did have to leave after 30 minutes due to my schedule. But I left feeling so happy that this has a chance of happening...at last. Our coast, our homes and businesses will benefit. With so much at stake, opposition to a well-thought out, fully funded wind farm project makes no sense at all to me. If we truly love the Cape as we say we do, we should be welcoming this project with open arms.

If there is anything I can do to help make this happen, I will do it.
Thank you for your work. Jane E. Hattemer-Stringer

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Public Comments Portal

alexander.strysky@mass.gov

View Comment

Comment Details

EEA #/MEPA ID
16611

Comments Submit Date
11-18-2022

Certificate Action Date
11-29-2022

Reviewer
Alexander Strysky (857)408-6957, alexander.strysky@mass.gov

First Name
Carole

Last Name
Maguire

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--

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Address Line 1
11 Jobys Lane

Address Line 2
--

State
MASSACHUSETTS

Zip Code
02655

Organization
Concerned Citizen

Affiliation Description
Individual

Status
Opened

Comment Title or Subject

Topic: Commonwealth Wind / Dowses Beach

Comments

I am writing to vehemently oppose the proposed offshore cable landing at Dowses Beach. This beach area is much too fragile to handle the industrial impacts of such a large project. Having seen a similar project's impact on Covell's beach and the surrounding area, I cannot imagine the impact that this would have on Dowses Beach. The Covell's and Craigville beach projects have direct access to the main road. Most of the businesses and residences near it are seasonal. Dowses beach, with its narrow causeway, the 2 connected bays and the abundance of wildlife is a much more fragile area. I can't imagine why it is even under consideration. Furthermore, Dowses Beach is used year-round by residents from all over the area. While Covell's beach has nearby Craigville beach for people to alternate with, there is no such alternative for people who want to access Dowses during the time of proposed construction.

Please - do not allow Avengrid to destroy this beautiful beach and natural resource!

Carole Maguire

Attachments

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Status

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Public Comments Portal

alexander.strysky@mass.gov

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Comment Details

EEA #/MEPA ID
16611

Comments Submit Date
11-18-2022

Certificate Action Date
11-29-2022

Reviewer
Alexander Strysky (857)408-6957, alexander.strysky@mass.gov

First Name
James

Last Name
Paterson

Phone
--

Email
jpaterson9238@gmail.com

Address Line 1
31 Sherman Street

Address Line 2
N/A

State
MASSACHUSETTS

Zip Code
02138

Organization
--

Affiliation Description
Individual

Status
Opened

Comment Title or Subject

Topic: New England Wind 2 Connector

Comments

I'm a longtime (30 year) property owner and summer-resident in Osterville, MA. I strongly support the New England Wind 2 Connector project at Dowses Beach and would be happy and proud to see the village of Osterville make a significant contribution to turning back the existential threat posed by climate change.

Attachments

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Status

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From: Randy Harnois
To: Strysky, Alexander (EEA)
Subject: Dowses Beach
Date: Friday, November 18, 2022 7:43:26 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

I would like to add several comments about the Avangrid. First. I believe this was defeated in Falmouth for the same reasons many are against this project here in Osterville. Environmental disaster. Working on around the beach for many days weeks months on a beach and surrounding wet land has to have a major effect. Not just for birds, grasses and sea creatures, but also we all use this beach year round. Second. This plan is a disaster for the small town. Construction from the beach to West Barnstable .. effects daily travel schools businesses .. the quality of everyday life. Third. Wind power does not seem to be the answer. This only lasts 25 years and what happens when these turbines are obsolete ? What happens ? Weather. Hurricane's .. what happens ? Noise pollution cause under the ocean for sea life. Studies show it effects dolphins whales etc. Much more needs to be studied. Fourth. Cost. When this was defeated (by Senator Kennedy). They proved no savings to costumers .. by the way does this office realize this has been defeated in the past. (Hyannis) Looks like Osterville was not planned out well or because they have no where else to go. !!! Thank you for your time. Please help stop any further exploration of this project ..
Patricia Harnois
Sent from my iPhone

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Energy & Environmental Affairs (https://www.mass.gov/orgs/executive-office-of-energy-and-environmental-affairs)

Public Comments Portal

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View Comment

Comment Details

EEA #/MEPA ID
16611

Comments Submit Date
11-19-2022

Certificate Action Date
11-29-2022

Reviewer
Alexander Strysky (857)408-6957, alexander.strysky@mass.gov

First Name
John

Last Name
Hauser

Phone
--

Email
hauser@mit.edu

Address Line 1
245 East Bay Road

Address Line 2
--

State
MASSACHUSETTS

Zip Code
02655

Organization
--

Affiliation Description
Individual

Status
Opened

Comment Title or Subject

Topic: Boating Interests

Comments

I am one of many people who moor my boat in East Bay or the Centerville River. We are active from May through October. To exit East Bay, we use a dredged channel of 6 feet or more. I listened to the presentation by Avangrid and they did not address the impact on East Bay per se or the East Bay channel. Will the project interfere with boating? For example, will the barge block the channel? Will suspended sediment make the channel unusable? Will the activity disturb the fishing? Will we still have access to the boat ramp? Etc.

I also note that Avangrid touts sewers, but the map show no sewers on East Bay Road along East Bay nor the parts of Wianno Ave closest to East Bay.

There is an active fishing community along the jetty that draws from all over. Will they be affected? Will they still have access?

Finally, I am many other elderly use Dowses Beach through October providing a place for healthy exercise.

Attachments

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BACK TO SEARCH RESULTS

From: MaryGaines Standish
To: Strysky, Alexander (EEA)
Subject: Re: Avangrid
Date: Saturday, November 19, 2022 5:18:15 PM

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On Sat, Nov 19, 2022 at 4:53 PM MaryGaines Standish <mgrstandish@gmail.com> wrote:

> As a long time resident of Osterville on East Bay Road, I am appalled at this affront to our lovely area and to all who are living here on . Residents have chosen Osterville because of its peaceful charm and beauty and year round enjoyment of one of the loveliest beaches on the Cape.
>
> And now, along comes Avangrid with its plans to disrupt our quiet, beautiful area. Dowse's is not only a home for migratory birds, but a place where families and friends can enjoy a quite respite from the craziness of the world. This churning up of our lives carries with it an arrogant "we don't care" attitude toward anyone in its path. Such an outrageous plan with no previous publicity has awakened a sleeping giant. Residents, as you may have guessed from the meeting Wednesday at the Osterville Library, are downright angry.
>
> I am definitely in favor of renewable energy, but only in the right place at the right time. Dowse's is not the right place nor is this the right time.
>
> Sincerely,
>
> Mary-Gaines Standish

From: scotmclane@aol.com
To: Strysky, Alexander (EEA)
Subject: Offshore Wind Project - Dowses Beach
Date: Saturday, November 19, 2022 3:02:21 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Greetings,

I zoomed into the Osterville Library meeting this past Wednesday and communicated that I'm strongly in favor of the cables coming in to Dowses. My only significant concern is the possibility of pollution caused by the "drilling muds" / "drilling lubricants" (not sure of the right term) used in the horizontal drilling. My hope is that the material selected is the least polluting option available, and that the most effective option for recovering as much of that material as possible is selected.

Also, I want to repeat something I said via Zoom on Wednesday...I think that the residents of Barnstable would overwhelmingly approve of the cables coming into Dowses. I also think that most Osterville residents would approve if they knew the actual details - in particular, that the cables will be 20-30 feet below the beach surface.

Finally, I wonder if there is a way I can find out when future informational/public comment meetings will be held - please let me know if there is a "mailing" list I can get on, or a web address where I can keep up to date.

Thanks,
Scott McLane

From: Paul Richards
To: Strysky, Alexander (EEA)
Cc: Paul Richards
Subject: New England Wind 2 Connector Comments to MEPA
Date: Sunday, November 20, 2022 1:28:22 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

My comment on this project pertains to shoreline over-build.

Barnstable's most popular swimming/recreational beaches have already been committed to several energy project landfalls.
Time to share the fun with Mashpee, Falmouth et al.
Barnstable landfalls include.....
Kalmus Beach has the second Nantucket cable
Covell Beach is the permitted landfall for Vineyard Wind
Craigville Beach will be the landfall for Park City
Now Dowses Beach is in the crosshairs for the New England Wind 2 Connector landfall.

The Barnstable town manager and town counsel, who have committed Dowses to get the host city benefits, to the best of my knowledge never asked the Barnstable citizenry whether or not having all our popular bathing beaches tied for months/years was acceptable. Has MEPA considered the "acceptability to the citizens" of Dowses as the fourth landfall as a decision criterion? It should be.

Respectfully submitted,
Paul Richards
Centerville

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Public Comments Portal

alexander.strysky@mass.gov

Dashboard(javascript:void(0);) › View Comment(javascript:void(0);)

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Comment Details

EEA #/MEPA ID
16611

Comments Submit Date
11-20-2022

Certificate Action Date
11-29-2022

Reviewer
Alexander Strysky (857)408-6957, alexander.strysky@mass.gov

First Name
Stephen

Last Name
Waller

Phone
--

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stevegwaller@gmail.com

Address Line 1
125 Blantyre Avenue

Address Line 2
--

State
MASSACHUSETTS

Zip Code
02632

Organization
none

Affiliation Description
Individual

Status
Opened

Comment Title or Subject

Topic: support for the wind farm and its connector at Osterville

Comments

I strongly support the efforts to create wind farms south of Nantucket and am very impressed with the horizontal drilling technique that the cable layers are using. To come ashore many feet below the surface is remarkable technology, and gentle on the environment. I was skeptical when the projects began in Centerville, but am now convinced it is a terrific plan for achieving our renewable energy goals for Cape Cod and Massachusetts. All of us in the central Cape communities will endure a few years of crowded roads as the cables are being laid, but that is a small price to pay for the colossal advance in renewable energy access they will bring. I have no financial interest to declare on this issue, but I do have a grandfatherly interest in seeing a better future.

Attachments

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Status

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BACK TO SEARCH RESULTS

From: Greg Gerdy
To: Strysky, Alexander (EEA)
Cc: Save Dowses Beach; Greg Gerdy
Subject: Save Dowses Beach from Avangrid's Commonwealth Wind
Date: Sunday, November 20, 2022 3:45:42 PM

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>
> Greetings Mr. Strysky,
>
> We hope this finds you well.
>
> We are writing you to express our deep concerns regarding the "big dig" of Dowses Beach.
>
> The fragility of the beach, the many birds that nest there, the surrounding environmental beauty and priceless marine area - all these will be seriously and negatively impacted if the Avangrid project (Commonwealth Wind) is allowed to destroy this unique part of Cape Cod.
>
> Although we understand the need for clean energy - and we are environmentally supportive of alternative energy sources - approving a destructive, multi year, massive construction project by putting a giant submarine cable at Dowses Beach will undoubtedly destroy the fragile Dowses Beach area in Osterville.
>
> We oppose the Commonwealth Wind project by Avangrid and ask that you and your office consider the lasting and devastating environmental damage to Dowses Beach.

> We ask that you and your office withhold any permits and any support from the Commonwealth Wind project and prevent it from going forward.

> What advantages are there in allowing Commonwealth Wind to proceed while simultaneously destroying unique and environmentally fragile Dowses Beach?

> There is still time and opportunity to say "NO" to Avangrid.
>
> There are less environmentally destructive ways to get clean energy. There are other less fragile places for Avangrid to construct their Commonwealth Wind project.
>
> Please tell Avangrid to stop their preliminary study now and to stay away from fragile Dowses Beach!
>
> Save Dowses Beach, Mr. Strysky!
>
> The future generations will be grateful to you Mr. Strysky and MEPA; as well as those of us who are still here to appreciate the unique beauty of Dowses Beach.
>
> Thank you.
> Gerdy family

From: Debbie Barlow
To: Strysky, Alexander (EEA)
Subject: Dowses Beach
Date: Tuesday, November 22, 2022 9:41:47 PM

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Hi Alex, please respond in detail, with specific proposed timelines , on all the ways, positive and negative, this project will affect East Bay and the many boaters who utilize East Bay Road, East Bay boat ramp, East Bay and East Bay Channel at the jetty to Nantucket Sound and the five mile radius or so of the Sound where we are frequent boaters from Spring through fall.
Thank you. Debbie Barlow

November 22.

Dear Mr. Stryskiy.

It would be remiss of me is I didrit express my opinion of the construction your company has planned for Dowses Beach in Osterville.

I come from a large family who were born here and stayed here.

This property is very important to all of us who live here and dont want it disrupted.

Thank you for caring for us.

Sincerely,
Martha Curley

From: Mary MacMillan
To: Strysky, Alexander (EEA)
Subject: Commonwealth Wind
Date: Wednesday, November 23, 2022 6:30:10 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

I would like to register my concern re Avangrid Renewables and their Commonwealth Wind Project at Dowses Beach in Osterville.
This property is not suitable for their project. It is a beautiful stretch of land surrounded by Nantucket Sound, East Bay and Phinneys Bay. It is a sanctuary for birds of all kinds, terns, piping plovers, osprey, ducks, swan , just to name a few.
The parking lot that so attracts Avengrid is accessed by one narrow causeway and is used year round by residents to access the beach , the handicap fish pier as well as to walk in winter when the roads are narrower.
Seal have been frequent visitors requiring a sign to warn visitors about bothering them.
We have seen what has happened to Covells beach in Centerville as it's been turned into an industrial site. This should never happen to Dowses.
The Dowse family previously owned this property. When their house blew down in 1944 they wanted the residents of Osterville to enjoy this treasure. It is not a public beach. It is a private beach for residents only. Our Town Council seems to think they own it but they do not.
Please listen to the many concerned citizens and tell Avangrid to find another venue .
Thank you
Mary M MacMillan
Sent from my iPhone

Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection
Southeast Regional Office • 20 Riverside Drive, Lakeville MA 02347 • 508-946-2700

Charles D. Baker
Governor

Karyn E. Polito
Lieutenant Governor

Bethena A. Card
Secretary

Martin Suuberg
Commissioner

November 23, 2022

Bethany A. Card,
Secretary of Energy and the Environment
Executive Office of Energy and
Environmental Affairs
100 Cambridge Street, Suite 900
ATTN: MEPA Office
Boston, MA 02114

RE: ENF Review. EOEEA 16611
BARNSTABLE. New England Wind 2 Connector located with proposed offshore export cables from Federal/Massachusetts offshore boundary, northerly to Dowses Public Beach in Barnstable (Landfall Site), and onshore underground electric transmission cables within existing roadway layouts to a new onshore electrical substation in Barnstable and ultimately to an interconnection point at Eversource's existing 345-kV West Barnstable Substation

Dear Secretary Card,

The Southeast Regional Office of the Department of Environmental Protection (MassDEP) has reviewed the Environmental Notification Form (ENF) for New England Wind 2 Connector located with proposed offshore export cables from Federal/Massachusetts offshore boundary, northerly to Dowses Public Beach in Barnstable (Landfall Site), and onshore underground electric transmission cables within existing roadway layouts to a new onshore electrical substation in Barnstable and ultimately to an interconnection point at Eversource's existing 345-kV West Barnstable Substation, Barnstable, Massachusetts (EOEEA #16611). The Project Proponent provides the following information for the Project.

The Vineyard Wind Connector 2 includes two three-core offshore export cables connecting the offshore electrical service platform (ESP) located in the SWDA to the landfall site onshore. The two offshore export cables will transition to six single-core onshore export cables in transition vaults/joint bays at the landfall site, then continue underground within a buried concrete duct bank. The route for this duct bank will predominantly follow existing public roadway layouts to a proposed onshore substation. The substation will step up voltage to enable the interconnection with the electrical grid at the existing Eversource 345-kilovolt (kV) West Barnstable Substation.

Offshore elements of Vineyard Wind Connector 2 will largely utilize the OECC developed for the Vineyard Wind Connector 1, which will transit through state and federal waters. Within Massachusetts waters, the

OECC will pass offshore through the towns of Edgartown, Nantucket, Barnstable, and possibly a corner of Mashpee before making landfall in Barnstable (see Figure 1-4 in Attachment B). The total length of the OECC from Park City Wind in the SWDA to the landfall site is approximately 63 miles (101 kilometers [km]), with approximately 23 miles (37 km) of the OECC located within state waters. Onshore Project elements will be located entirely within the Town of Barnstable.

Bureau of Water Resources Comments

Wetlands. The ENF indicates that the Notices of Intent will be submitted at some time in the future. The Project Proponent is advised to ensure that the resource areas are properly delineated and clearly depicted on the plans accompanying the NOIs. Proper resource area delineation at Dowses Beach (a barrier beach as defined in 310 CMR 10.29(2)) in Barnstable is critical in determining the Projects impacts to coastal resources found at that site. Pursuant to the Wetlands Protection Act Regulations, barrier beaches consist of coastal beaches and coastal dunes. Coastal Beaches consist of unconsolidated sediment subject to wave, tidal and coastal storm action that extends from the mean low water line landward to the dune line, coastal bank line or the seaward edge of existing human-made structures (310 CMR 10.27(2)). Coastal Dunes are any natural hill, mound or ridge of sediment that has been deposited by wind action or storm overwash that lies landward of a coastal beach (310 CMR 10.28(2)). The Surficial Geology data layer on MassMapper confirms the presence of an area of glacially deposited soils on Dowses Beach, a portion of which has been designated Coastal Bank on the plans accompanying the ENF. The NOI should include information that confirms the presence of glacially deposited sediments and an explanation as to the methodology used to delineate the coastal bank.

Based on the information and plans provided in the ENF, the Wetlands Program believes that HDD Drill Path 1 would likely have the least potential for causing damage to the coastal resource areas located on Dowses Beach. The Wetlands Program would encourage the Project Proponent to develop that alternative.

The Wetlands Program concurs with the Project Proponent's determination that the proposed Project could be reviewed as a Limited Project pursuant to 310 CMR 10.24(7)(b). As required by 310 CMR 10.24(9), the Notice of Intent should include an operation and maintenance plan to ensure that the infrastructure will continue to function as designed. Implementation of the operation and maintenance plan as approved by the issuing authority shall be a continuing condition that shall be set forth in the Order of Conditions and the Certificate of Compliance. Additionally, the Wetlands Program would suggest that the Project Proponent carefully review the Minor Exempt Activities provisions found in 310 CMR 10.02(2)(b)2.i. to determine if any of the work within the buffer zone or along Old Falmouth Road and Oak Street meets the criteria listed in that section of the Wetlands Protection Act Regulations.

Waterways. Pursuant to the Waterways Regulations at 310 CMR 9.12(2)(b)10., the Project would be classified as a water-dependent-industrial use.

On March 10, 2020, the Department issued Chapter 91 License No. 15011 approving Vineyard Wind Connector 1. A second Project, New England Wind 1 Connector is currently under Chapter 91 review. The offshore components of this Project, New England Wind 2 Connector, are very similar to the prior projects as the export cables will be installed in the previously approved construction corridor with the exception that the preferred landfall will be at the Town owned Dowses Beach in Barnstable. Portions of the construction corridor will be widened to accommodate the additional cables. The DEIR should include more detailed information on the delineation of the expanded areas of the construction corridor.

The proposed three (3) offshore export cables will require up to approximately 131,100 cubic yards of dredging within state waters in order to bury the cables approximately 5 feet below the sea floor. In addition to the Chapter 91 License required for the cables, a Chapter 91 Dredge Permit and 401 Water Quality Certification will be required to install the cables. The Proponent may choose to file a MassDEP BRP WW26 Combined Application for Chapter 91 and WQC.

It appears that the noticed alternative onshore cable route along Five Corners Road may pass over a river/stream subject to Chapter 91 jurisdiction. However, assuming the stream is non-tidal, and the cables will be embedded in the soil beneath the stream, they would be exempt from licensing pursuant to the Waterways Regulations at 310 CMR 9.05(3)(g). In the preparation of the DEIR the Proponent is requested to identify any non-tidal rivers or streams that may be subject to Chapter 91 jurisdiction and confirm the construction methodology for these crossings. In addition, the alternative onshore cable route along East Bay Road crosses a small area of previously filled tidelands. The DEIR should address this area and the need for Chapter 91 licensing if the alternative onshore route is utilized.

Waterways/Boston.

Dredging

Pursuant to 314 CMR 9, a 401 Water Quality Cert. should be filed for MassDEP to review and approve on the proposed Project.

Long-Term Benthic Resource Monitoring

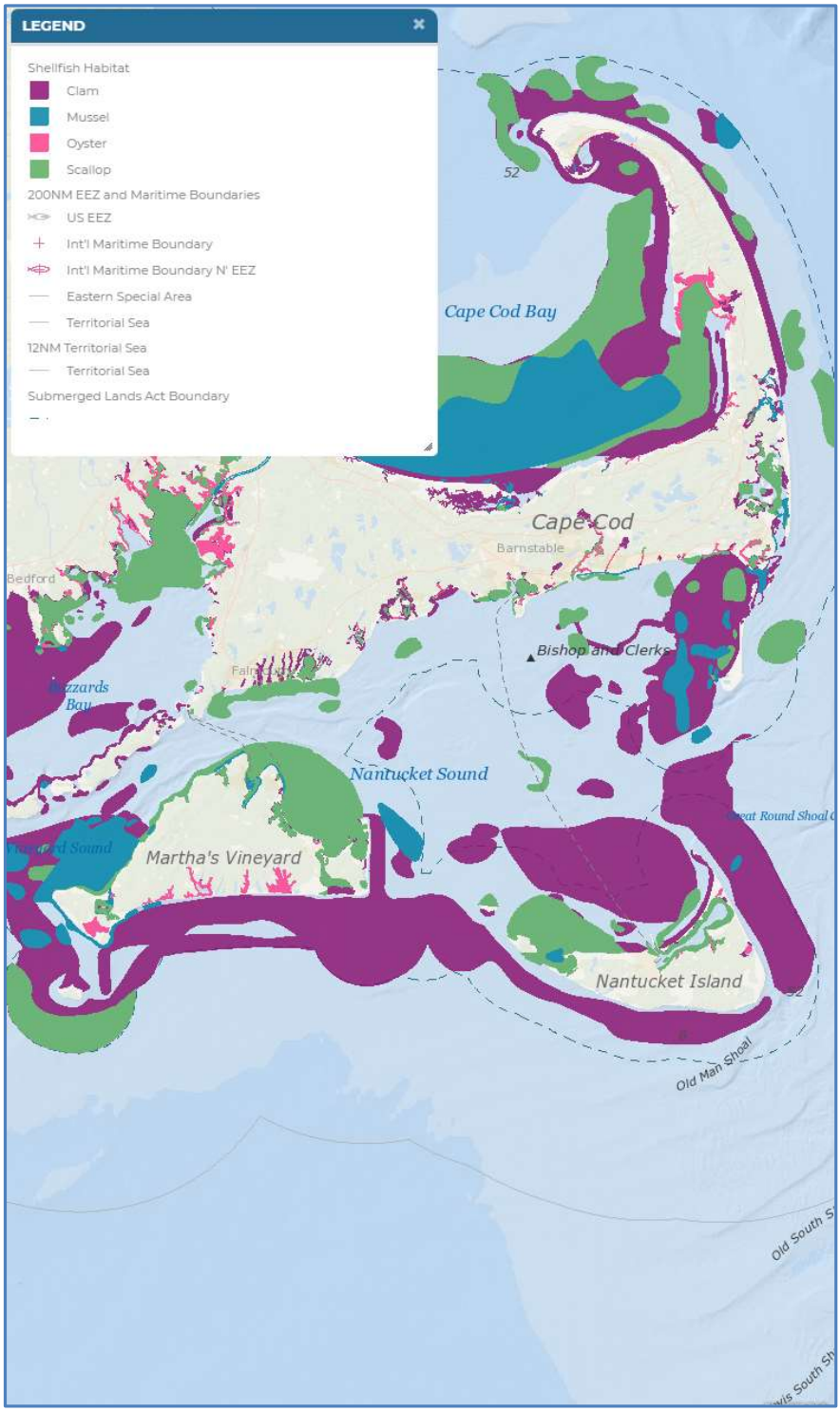
The proposed Project area is an area with highly valuable ecological service and economical values provided by mammals, turtles, sea birds, fish, eelgrass beds, coastal wetlands, shellfish habitat (Figure 1), calanus, shrimp, amphipods, crab, and sea stars. Trenching tool is the proposed as the major cable installation method. At the same time, dredging a deeper trench to ensure adequate burial depth is also proposed (i.e., dredging of up to 131,100 cubic yards) of sediment in connection with installation of the offshore export cables) and, where burial is not possible due to subsurface conditions, armoring may be needed to cover the cables laid on the ocean floor. Therefore, such construction and operations (e.g., dredging and armoring) will have direct impact to the benthic resources. As a result, benthic organisms in the dredging area will be impacted severely and the impact will be lasting for a long time.

MassDEP suggests the Proponent to develop a systematic survey using the Before-After Control-Impact (BACI) design. The survey should be conducted prior to the start of construction activities, and consistent post-construction monitoring protocol should be used for assessing 1) the impact to benthic habitat and benthic community, and 2) any recovery of benthos and how long it takes to recover, if there is any. In addition, more detailed information of the monitoring plan should be provided to MassDEP for review and approval. For example, how long and frequent the sampling events to monitor the benthos should be further refined in the monitoring plan and provided to stakeholders.

Long-term Invasive Species Monitoring

The newly created habitats such as the armoring material may facilitate the establishment and spread of invasive species. Therefore, a systematic monitoring plan as part of long-term resource monitoring for potential marine invasive species colonization should be developed prior to commencement of the Project.

Fig. 1 Benthic Shellfish Habitat: Coastal Martha's Vineyard, Nantucket Island, and Cape Cod



Stormwater Management/National Pollutants Discharge Elimination System (NPDES) Permit.
Construction General Permit
The Proponent has acknowledged the need for a Construction General Permit. The Proponent can access information regarding the NPDES Stormwater requirements and an application for the Construction General Permit by completing and submitting a Notice of Intent (NOI) to EPA via the

Stormwater Discharges from Construction Activities | National Pollutant Discharge Elimination System (NPDES) | US EPA.

The Proponent is advised to consult with Sania Kamran (Kamran.Sania@epa.gov, 617- 918-1522) for questions regarding EPA's NPDES Construction General Permit requirements.

In addition, the Proponent is reminded that local Planning Boards (and/or other local authorities) may require stormwater controls beyond that of the Wetlands Protection Act. These controls are usually created to keep stormwater onsite so as not to create nuisance conditions offsite.

Bureau of Waste Site Cleanup (BWSC)

Based upon the information provided, the Bureau of Waste Site Cleanup (BWSC) searched its databases for disposal sites and release notifications that have occurred at or might impact the proposed Project area. A disposal site is a location where there has been a release to the environment of oil and/or hazardous material that is regulated under M.G.L. c. 21E, and the Massachusetts Contingency Plan [MCP – 310 CMR 40.0000].

The proposed Project involves 6.7 miles of offshore wind transmission line from Dowses Beach in Osterville to a substation on Oak Street in West Barnstable. Please be advised that there are many listed BWSC disposal sites located within and near the proposed Project area. Many of the sites have been closed under the MCP, but other disposal sites are open and require continued response actions under the MCP. A listing and discussion of each MCP site will not be presented here. The application adequately addressed potential MCP issues, including hiring a Licensed Site Professional and implementing a Utility-Related Abatement Measure if oil and/or hazardous materials are encountered within the rights-of-way.

Interested parties may view a map showing the location of BWSC disposal sites using the MassGIS data viewer at MassMapper. Under the Available Data Layers listed on the right sidebar, select "Regulated Areas", and then "DEP Tier Classified 21E Sites". MCP reports and the compliance status of specific disposal sites may be viewed using the BWSC Waste Sites/Reportable Release Lookup at: https://eeaonline.eea.state.ma.us/portal#!/search/wastesite

The Project Proponent is advised that if oil and/or hazardous material (OHM) are identified during the implementation of this project, notification to MassDEP may be required pursuant to the Massachusetts Contingency Plan (310 CMR 40.0000). Any OHM encountered during this roadway Project could likely be addressed using the Utility-Related Abatement Measures provisions at 310 CMR 40.0460. A Licensed Site Professional (LSP) should be retained to determine if notification is required and, if need be, to render appropriate opinions and/or conduct response actions. The BWSC may be contacted for guidance if questions arise regarding cleanup.

Spills Prevention and Control. The Project Proponent reports: "a Spill Prevention, Control and Countermeasures (SPCC) Plan will be included in the Proponent's Construction Management Plan. The Company will also include spill response in its emergency response plan as part of the Project's overall safety management system. Appropriate spill containment kits and spill control accessories will be strategically situated at the substation and may include absorbent pads, temporary berms, absorbent socks, drip pans, drain covers/plugs, appropriate neutralizers, over pack containers all for immediate use in the event of any inadvertent spills or leaks. All operators will be trained in the use

and deployment of such spill prevention equipment. The Company will also have a third-party licensed spill response contractor on call as part of the Project's overall Oil Spill Response Plan.

The Project Proponent is reminded that a spills contingency plan addressing prevention and management of potential releases of oil and/or hazardous materials from pre- and post-construction activities should be presented to workers at the site and enforced. The contingency plan should include but not be limited to, refueling of machinery, storage of fuels, and potential on-site activity releases.

Bureau of Air and Waste (BAW) Comments

Air Quality. Construction and operation activities shall not cause or contribute to a condition of air pollution due to dust, odor or noise. To determine the appropriate requirements please refer to:

310 CMR 7.09 Dust, Odor, Construction, and Demolition
310 CMR 7.10 Noise

Massachusetts Air Quality and Substation Noise. The ENF is silent concerning noise levels at the proposed substation in West Barnstable and offers the following comments: MassDEP's noise policy establishes a 10 dB(A) increase in sound as the maximum sound impact which cannot be exceeded at the property line or the nearest receptor. Sound increases are evaluated in accordance with the MassDEP Noise Pollution Policy Interpretation. The Proponent is reminded that the 10 dB(A) is not a design standard but a performance standard. Sound impacts should be mitigated to extent practicable.

Massachusetts Air Quality and Construction-Related Measures

The Project Proponent reports: *"*the Company will direct its contractors to retrofit any diesel-powered non-road construction equipment rated 50 horsepower or above to be used for 30 or more days over the course of the Project with USEPA-verified (or equivalent) emission control devices (e.g., oxidation catalysts or other comparable technologies). The Company and its contractors will also comply with state law (G.L. c. 90, § 16A) and MassDEP regulations (310 C.M.R. 7.11(1)(b)), which limit vehicle idling to no more than five minutes. There are exceptions for vehicles being serviced, vehicles making deliveries that need to keep their engines running and vehicles that need to run their engines to operate accessory equipment. There may be other times when idling is permitted if the idling is necessary (e.g., as a matter of safety)

MassDEP reminds the Project Proponent that all non-road diesel equipment rated 50 horsepower or greater should meet EPA's Tier 4 emission limits, which are the most stringent emission standards currently available for off-road engines. If a piece of equipment is not available in the Tier 4 configuration, then the Proponent should use construction equipment that has been retrofitted with appropriate emissions reduction equipment. Emission reduction equipment includes EPA-verified, CARB-verified, or MassDEP-approved diesel oxidation catalysts (DOCs) or Diesel Particulate Filters (DPFs). The Proponent should maintain a list of 4 the engines, their emission tiers, and, if applicable, the best available control technology installed on each piece of equipment on file for Departmental review.

Massachusetts Air Quality and Idling Regulation

The ENF reports: "The Proponent will require contractors to turn off construction vehicles when not actively in us."

MassDEP reminds the Proponent that unnecessary idling (i.e., in excess of five minutes), with limited exception, is not permitted during the construction and operations phase of the Project

(Section 7.11 of 310 CMR 7.00). Regarding construction period activity, typical methods of reducing idling include driver training, periodic inspections by site supervisors, and posting signage. In addition, to ensure compliance with this regulation once the Project is underway, MassDEP recommends that the Proponent install signs limiting idling to five minutes or less on-site.

Hazardous Waste Management. The Project Proponent is silent on its use of hazardous materials following the construction of its new substation.

The Project Proponent is reminded that hazardous waste must be properly registered with the MassDEP in accordance with 310 CMR 30.000 for legally generating and managing regulated waste. The Proponent is advised to consult at this MassDEP website https://www.mass.gov/guides/hazardous-waste-generation-generators to determine if the Proponent qualifies as a generator of hazardous waste and/or waste oil.

Solid Waste Management. The Project Proponent reports: "Asphalt and possibly concrete waste generated during construction…will be handled separately from soil to allow for recycling at an asphalt batching plant and/or recycling facility. Waste materials generated during installation of the Project will be promptly removed for recycling or proper disposal at a suitable facility. Further stating that "Packing crates and wood from equipment shipments will be reused or recycled to the extent practicable or will be disposed of appropriately and "the majority of the proposed onshore substation parcels will be cleared for construction and operation. "

The Proponent is advised that any solid waste found or generated during construction must be disposed of at an appropriate MassDEP approved facility.

1. *Compliance with Waste Ban Regulations*: Waste materials discovered during construction (e.g., metal, asphalt, brick, and concrete) shall be disposed, recycled, and/or otherwise handled in accordance with the Solid Waste Regulations including *310 CMR 19.017:* Waste Bans. Waste Ban regulations prohibit the disposal, transfer for disposal, or contracting for disposal of certain hazardous, recyclable, or compostable items at solid waste facilities in Massachusetts, including, but not limited to, metal, wood, asphalt pavement, brick, concrete, and clean gypsum wallboard. The goals of the waste bans are to: promote reuse, waste reduction, or recycling; reduce the adverse impacts of solid waste management on the environment; conserve capacity at existing solid waste disposal facilities; minimize the need for construction of new solid waste disposal facilities; and support the recycling industry by ensuring that large volumes of material are available on a consistent basis. Further guidance can be found at: https://www.mass.gov/guides/massdep-waste-disposal-bans.

   MassDEP recommends the Proponent consider source separation or separating different recyclable materials at the job site. Source separation may lead to higher recycling rates and lower recycling costs. Further guidance can be found at: https://recyclingworksma.com/construction-demolition-materials-guidance/

   For more information on how to prevent banned materials from entering the waste stream the Proponent should contact the RecyclingWorks in Massachusetts program at (888) 254-5525 or via email at info@recyclingworksma.com. RecyclingWorks in Massachusetts also provides a website that includes a searchable database of recycling service providers, available at http://www.recyclingworksma.com.

2. *Asphalt, brick, and concrete (ABC) rubble,* such as the rubble generated during construction must be handled in accordance with the Solid Waste regulations. These regulations allow, and MassDEP encourages, the recycling/reuse of ABC rubble. The Proponent should refer to MassDEP's Information Sheet, entitled " Using or Processing Asphalt Pavement, Brick and Concrete Rubble, Updated February 27, 2017 ", that answers commonly asked questions about ABC rubble and identifies the provisions of the solid waste regulations that pertain to recycling/reusing ABC rubble. This policy can be found on-line at the MassDEP website: https://www.mass.gov/files/documents/2018/03/19/abc-rubble.pdf.

3. *Tree removal/land clearing/clean wood:* As defined in 310 CMR 16.02, clean wood means "discarded material consisting of trees, stumps and brush, including but limited to sawdust, chips, shavings, bark, and new or used lumber"…etc. Clean wood does not include wood from commingled construction and demolition waste, engineered wood products, and wood containing or likely to contain asbestos, chemical preservatives, or paints, stains or other coatings, or adhesives. The Proponent should be aware that wood is not allowed to be buried or disposed of at the Site pursuant to 310 CMR 16.00 & 310 CMR 19.000 unless otherwise approved by MassDEP. Clean wood may be handled in accordance with 310 CMR 16.03(2)(c)7 which allows for the on-site processing (i.e., chipping) of wood for use at the Site (i.e., use as landscaping material) and/or the wood to be transported to a permitted facility (i.e., wood waste reclamation facility) or other facility that is permitted to accept and process wood

If the Project Proponent has any questions regarding the Solid Waste Management Program comments above, please contact Elza Bystrom at Elza.Bystrom@mass.gov or Mark Dakers at Mark.Dakers@mass.gov or (508) 946-2847.

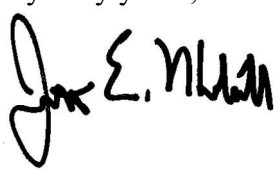
Proposed s.61 Findings

The "Certificate of the Secretary of Energy and Environmental Affairs on the Environmental Notification Form" may indicate that this Project requires further MEPA review and the preparation of an Environmental Impact Report. Pursuant to MEPA Regulations 301 CMR 11.12(5)(d), the Proponent will prepare Proposed Section 61 Findings to be included in the EIR in a separate chapter updating and summarizing proposed mitigation measures. In accordance with 301 CMR 11.07(6)(k), this chapter should also include separate updated draft Section 61 Findings for each State agency that will issue permits for the Project. The draft Section 61 Findings should contain clear commitments to implement mitigation measures, estimate the individual costs of each proposed measure, identify the parties responsible for implementation, and contain a schedule for implementation.

Other Comments/Guidance

The MassDEP Southeast Regional Office appreciates the opportunity to comment on this ENF. If you have any questions regarding these comments, please contact George Zoto at George.Zoto@mass.gov or Jonathan Hobill at Jonathan.Hobill@mass.gov.

Very truly yours,



Jonathan E. Hobill,
Regional Engineer,

Bureau of Water Resources

JH/GZ

CC.: DEP/SERO

ATTN: Millie Garcia-Serrano, Regional Director
Gerard Martin, Deputy Regional Director, BWR
John Handrahan, Acting Deputy Regional Director, BWSC
Seth Pickering, Deputy Regional Director, BAW
Jennifer Viveiros, Deputy Regional Director, BAS
Daniel Gilmore, Chief, Wetlands and Waterways, BWR
Brendan Mullaney, Wetlands, BWR
David Hill, Waterways, BWR
Daniel Padien, Chief, Waterways, BWR/Boston
David Wong, Wetlands and Waterways, BWR/Boston
Mark Dakers, Chief, Solid Waste Management, BAW
Elza Bystrom, Solid Waste Management, BAW
Daniel DiSalvio, Chief, Compliance and Enforcement, BAW
Thomas Cushing, Chief, Air Quality Permitting, BAW
Allen Hemberger, Site Management, BWSC

From: Susanne Conley
To: Strysky, Alexander (EEA)
Subject: Public Response to New England Wind 2 Connector ENF EEA#16611
Date: Wednesday, November 23, 2022 12:30:29 PM
Attachments: Public Response to NE Wind 2 Connector.pdf

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Alex:

First, thank you so much for being in Osterville on November 16 to hear from members of our community regarding the Commonwealth Wind proposal to land electrical cables at Dowses Beach. I'm attaching a copy of our *ad hoc* community activist group's public response to the New England Wind 2 Connector ENF. "Save Greater Dowses Beach" is an unincorporated association with 234 members. Please let me know if you have any questions. Thank you.

Best regards,

Susanne Conley
508 922 4342

TO: Mr. Alexander Strysky, MEPA

From: Susanne H. Conley,
on behalf of the group Save Greater Dowses Beach

Re: Public Comment to the New England 2 Wind Connector ENF
EEA# 16611

I write as the representative of an *ad hoc* community activist group, "Save Greater Dowses Beach." Our group is dedicated to the prevention of the Dowses beach estuarine area from being used by Avangrid Renewables, under the auspices of "Commonwealth Wind, LLC," for the landing of electrical export power cables from a future offshore wind farm. The reasons for our opposition are many and are described herein.

The Environment

Background.
We refer to "greater" Dowses beach because it is a complex, multi-faceted estuarine environment. Specifically, the area is comprised of a barrier spit fronting Nantucket Sound, a lengthy dune system, an inlet, a breakwater, a handicapped accessible fishing pier, a paved parking area, a sandy back beach, the mouth of the Centerville River, a large bay (East Bay) with a mooring ground, a smaller brackish bay (Phinney's Bay), and a narrow causeway that divides the two bays, except for a culvert for water exchange, and that is the only means of resident access for automobiles, bicycles, and foot traffic.
Dowses beach provides important year-round recreational opportunities for all Barnstable residents, and is an historically and socially important aspect of life for the residents of Osterville Village. The greater Dowses Beach area was purchased by the Town of Barnstable in 1946 following extensive destruction to private homes caused by the hurricane of 1944. The Dowse family sold the beach and its environs for the sum of $40,000, or $611,000 in today's dollars. Should the property be sold to a private party in 2022, this Nantucket Sound waterfront property would be worth many times that sum — we therefore assume a significant measure of largesse on the part of the Dowse family that was intended to protect and preserve this natural heritage for residents of the town. While the deed documenting the sale of Dowses includes no restrictions, the Town notes that its acquisition would be for the purpose of "a bathing beach."
An often heard counterpoint to our group's opposition to the Commonwealth Wind project is that the area is not in a "natural" state. We agree that this acreage is not a greenfield. Rather, it has been partially engineered over the years to provide vehicular access, recreational opportunities, and erosion control. This does not mean that it is anything less than a critically important estuarine environment deserving of stringent coastal resource protection. The United States Environmental Protection Agency defines estuaries as "a partially enclosed, coastal water body where freshwater from rivers and streams mix with salt water from the ocean …." This describes the greater Dowses beach area exactly. The 2006 Massachusetts Estuaries Project report on the Centerville River Embayment system confirms that the area is integral to the "Centerville River/East Bay Estuary," and acknowledges the importance of the "barrier spit" (i.e. the Dowses fore beach) as protection for this estuarine system.
We offer this background information to a) present a clear picture of the greater Dowses beach environment, which we believe is not represented in the ENF, and b) to help MEPA understand why there has been such a significant backlash among Osterville residents in particular, and

those of Barnstable in general, to the use of this beautiful, quintessential Cape Cod landscape for a 3-year long, industrial-scale construction project.

Objections.

According to the Environmental Notification Form filed on behalf of New England Wind 2 Connector by Epsilon Inc., the proponent considered nine (9) "Landfall Location Alternatives." All of these are sites located in the Town of Barnstable. As of this writing, Barnstable does not have a Host Community Agreement with Avangrid Renewables for the Commonwealth Wind project. The Barnstable Town Council did pass a motion on November 4, 2022, authorizing Mr. Mark Ells, Town Manager, to begin discussions with the proponent to craft a HCA. We believe that the very limited exploration of landfall options exhibited by the company represents an approach of "least resistance." As we will discuss in detail, the Town of Barnstable has tried to leverage its Nantucket Sound public beaches to gain funding for its severely underfunded Comprehensive Wastewater Management Project (CWMP). Our group believes that this relationship resulted in a very incomplete assay of the available grid connection options.[1]

Frankly, the proponent seeks the cheapest, politically easiest solution for its need to export electrical power, and wants to do so at the expense of greater Dowses beach and all it means for a healthy environment, the wildlife it supports, and the people of Osterville.

In its summary of potential export cable landfall sites (ENF Table 3-1, p. 14), the proponent lists all nine (9) Barnstable locations it considered. Two of these, Prince's Cove and McCarthy's Landing are rejected in part because the project "would result in direct impacts to estuarine habitat…." In contrast, when evaluating the Centerville River/East Bay estuary that is fronted by Dowses beach and its dune system, the proponent claims the project "has [the] ability to avoid impacts to any environmentally sensitive areas…." Nowhere in the proponent's description of the Dowses beach area are the words "estuary" or "estuarine." This, we believe, is a self-serving omission, as the true appeal of Dowses for the proponent is the public parking lot that exists between the fore and back beaches and the willingness of town management to accede to the company's demands.

In a glaring misrepresentation of the greater Dowses beach area, the proponent describes the route of its export cables as "Dowses Beach Road, left on East Bay Road, then right unto Wianno Avenue…." We believe the term "Dowses Beach Road" is intentionally deceptive. There is no such named roadway, as can be confirmed on the Town of Barnstable's official GIS map of roadways. There is only an exceptionally narrow causeway, which replaced what was once a wooden walkway to the pre-1944 Dowse home. There is no named street at all, and to suggest such diminishes the special nature of this feature, which is to maintain the natural separation of East Bay and Phinney's Bay while allowing water exchange and tidal fluctuation to occur.

Of course, an important function of estuarine areas is to mitigate against high water as a result of changing global conditions and storm events. This in and of itself argues against subjecting such an environment to construction of any kind. Electrical export cable landings on a straight-line beach is one thing; doing so in a sensitive estuarine environment is quite another. We argue that the proponent must find another, more suitable location, and explore potential sites beyond the Town of Barnstable.

[1] As an example of options not considered, Mayflower Wind's pivot from a beach landing on Cape Cod to one at Brayton's Point is instructive. Mayflower will utilize the infrastructure present in Somerset, MA at a decommissioned coal-burning power plant. A similar option was never considered, as far as we can tell, for that location or the Cape Cod Canal plant, also decommissioned but with the ability to interconnect with the NE power grid.

The Greater Dowses Beach Wildlife Habitat

Background.

When agencies such as the United States Environmental Protection Agency and the Massachusetts Department of Environmental Protection explain the importance of protecting estuarine environments, their role in providing habitat for wildlife is always cited. Those who know the Dowses beach area well need no convincing as to the importance of this area to many forms of life, including birds, fish, shellfish, and plants.

Cornell University's Ornithology Lab manages a well-respected website, "ebird.org," that chronicles bird species sightings made by accomplished birdwatchers. This site lists "Dowses Beach" as a "hotspot" for bird sightings and therefore the area attracts many birding amateurs and professionals throughout the year. A histogram downloaded from ebird.org allows one to document the extent to which bird species, both resident and transitory, make Dowses home throughout the year. The list includes shorebirds and upland species and is extensive. Between 2012 and 2022, watchers recorded a total of 168 bird species at the greater Dowses area. This number has remained relatively consistent over the course of the last 122 years. All bird sightings documented from 1900 to the present included 172 species, indicating a stable, flourishing "unofficial" bird sanctuary.

A review of a histogram showing sightings since 2012 reveals two important considerations. First, the greater Dowses area is an important home to birds throughout the year. While many species are year-round residents, including shorebirds such as the ring-billed and herring gulls, many others are winter visitors, such as more rare examples like the Iceland Gull and the Greater and Lesser Scaup. The 2022 "State of the Birds" report by the Natural Heritage and Endangered Species Program cites nine (9) species that are in the "Tipping Point" category on Cape Cod, meaning that these species have demonstrated seriously declining populations and are experiencing a high vulnerability of extinction. Of these, six (6) are visitors to the greater Dowses beach area, and include the Saltmarsh Sparrow, Least Tern, Whimbrel, Ruddy Turnstone, Least Tern, and Piping Plover. No fewer than twenty-seven (27) duck species spend winter months in Phinney's Bay, East Bay, and in the inlet between the Dowses fishing pier and Centerville's Long Beach adjacent to the mouth of the Centerville River. These species range from the common American Black Duck to the much more rare Ring-necked Duck. The importance of roosting areas free of disturbance for migratory shorebirds goes without saying. Included in the ten-year histogram of bird sightings is a reference to 27 additional taxa. While not specified, common sightings include sea and land turtles, deer, fox, coyote, and mink. Though not common, seals have been known to swim in the waters near the breakwaters at each end of the fore beach and have been found resting on the sand as late as November.

Fish and shellfish of many varieties are found in the Sound and in both bays. Those who utilize the fishing pier and the shoreline catch False Albacore, Bluefish, Striped Bass, Scup (Porgy) and various less common specimens such as Puffer Fish. East Bay teems with bait fish and schoolies year round, although occasional ice-overs make sight casting more difficult.

An especially sought after species of sea life in and around the pier, breakwater and East Bay shoreline are the abundant blue crabs, harvested by locals from May 1 to December 31 each year. Blue Crabs require moving water, which is why they inhabit the inlet area of the greater Dowses environment. Shellfish are equally plentiful in the sea, the inlet, and especially the bay. These include lightning whelk, whose egg casings wash ashore each winter in great numbers. Osterville's very name is derived from the oysters common to local waters. As is well-documented, a healthy shellfish population is essential to the removal of nitrogen in a marine environment. Another very vulnerable population, as described by the International

Union for the Conservation of Nature, is the American Horseshoe Crab. Dowses beach is an important spawning and molting area for these animals, whose decline is partially attributed to coastal zone development. The young, which molt multiple times throughout the year, do so in great numbers at Dowses beach; the adults do as well twice a year. At times, their discarded shells number in the hundreds from one end of the strand to the other.

Objections.

During a meeting with personnel from Avangrid Renewables, a member of the Osterville Village Association asked about the inevitable, long-term devastation to the significant Dowses bird population during construction. The answer, verbatim, was "Oh, we've got the piping plovers covered." Such a response indicates at best a lack of understanding of the greater Dowses area as an important sanctuary for many forms of wildlife, and at worst a completely cavalier attitude about the decimation a 3-year long construction project would have on land and sea-based wildlife in this estuarine environment. We assume the piping plovers are "covered" because Avangrid Renewables considers them a "summer bird" (they claim they will only conduct work at Dowses in the "off-season") when the truth is much more complex.

We believe the HDD operation on and under the seabed will divert the natural movement patterns of local fish stock, greatly decimate shellfish numbers, and negatively impact the considerable local horseshoe crab population. The installation of three (3) conduits for the onshore export cables will occur under the beach from one end to the other, causing vibration, displacement, and noise, all of which are anathema to shorebirds. The pits in the parking lot will in all likelihood prove disruptive and potentially hazardous for land animal movement. The ditching of the causeway will certainly prevent cross-bay spawning for species of fish that use the calm waters of Phinney's Bay to reproduce each spring. All of this is unnecessary disruption of a unique wildlife habitat because Avangrid Renewables has focused all of its attention on the Town of Barnstable's Nantucket Sound beaches – simply because Barnstable has been willing to accept financial and in-kind contributions to support its CWMP. When it comes to the greater Dowses beach estuarine environment, this focus is entirely and especially inappropriate.

<u>Town of Barnstable and Proponent Relationship</u>

Background.

In 2020, The Town of Barnstable finalized its Comprehensive Wastewater Management Plan after receiving necessary approvals from state and county permitting agencies. The 30-year sewering project, planned in three (3) phases over 30 years, reflected an expansion of "Phase 2"(2030-2040) into the downtown village center of Osterville. According to a recent report, the sewering plan remains severely underfunded. The August, 2022 CWMP FY2022 Annual Report indicates the project cost for Phase 1 to be $304 million, while "existing resources can provide for approximately $165 million of this cost." A shortfall of $5.5 million in each of the fiscal years 2023-2027 must be addressed.

Meanwhile, as early as 2018, the proponent, a 50 percent partner in the Vineyard Wind project, was present in Barnstable advocating for electrical export cable landings at Covell's Beach in the village of Centerville and engaging in discussions with town management. In October, 2018, Barnstable Town Council approved an easement for a power cable at Covell's beach over the objections of a significant group of Centerville residents.

Objections.
Between early 2018 and the present, the CWMP and the proponent's plans for Barnstable's Nantucket Sound beaches have developed symbiotically. What has become clear is that the proponent was never interested in the Vineyard Wind project as a stand-alone. Rather, from the very beginning, the company planned for a construction project at Craigville beach in Centerville (Park City Wind), as well as for a very large installation at Dowses. The final version of the CWMP showed an extension of the sewering project into Osterville that exactly corresponds with the proponent's preferred route for export cables between the Dowses area and the planned substation.
The town has adopted a three part narrative regarding the Commonwealth Wind project. First, Town Manager Ells frequently promotes the notion when meeting with community groups that the project at greater Dowses beach is a "done deal," despite the early status of permitting. Second, Ells touts the financial payments and in-kind contributions of Avangrid Renewables to the underfunded sewering project. Third, Ells claims that objection to the project is meaningless, because no one can stop the proponent's proposal to basically commandeer the greater Dowses beach area. As he claims, even if he and the Town Council were opposed to the project (which they are clearly not), the proponent would come and do what they want without the town's permission or cooperation. This is an abrogation of home rule that is startling to say the least, and unsupported, in our opinion, by 310 CMR's provisions for construction related to the development of renewable energy projects.
Our objections to the relationship between the Town of Barnstable and the proponent are twofold. First, as previously stated, the proponent did not thoroughly consider all viable options to export electricity from a future wind farm given the Town of Barnstable's willingness to trade easements, access, and long term disruption to taxpayers in order to enhance the CWMP funding stream. In this, we contend that both sides took the path of least resistance, a choice that has the potential to inflict environmental damage on a fragile and unique estuary. Second, discussions, agreements, and deal-making between the town and the proponent were carried out, we believe, in such a way that the residents of Barnstable were purposely kept in the dark until projects could be described as done deals. As our *ad hoc* community action group has learned during our information-gathering activities, public awareness of each of the projects was practically non-existent. In Osterville, residents first became generally aware of the Commonwealth Wind proposal to land cables at Dowses, as well as the specifics of the project during the summer of 2022. The dismay and anger we have documented is, to say the least, extensive. We have amassed 1,000 signature petitions opposing the cable landing at Dowses in a matter of weeks, and have witnessed first-hand how these plans have affected the once peaceful nature and undeniable quality of life in the village of Osterville.

<u>Other Considerations</u>

To the extent that MEPA serves to protect the environment for wildlife and humans alike, our group wishes to make additional observations that speak to the unsuitability of the greater Dowses beach area for an extended period of heavy construction:

1. When first exploring the Town of Barnstable's Nantucket Sound beaches, Avangrid Renewable informed town officials that Kalmus Beach, in the village of Hyannis, would be unsuitable as the cables would eventually be routed through part of the downtown Hyannis business district. Yet, Avangrid Renewables' preferred route away from Dowses

would bisect the entire Osterville business district, which is still recovering financially from the hardship caused by the COVID-19 emergency.

2. When discussing its rejection of a proposed route for cables to run from the Park City project with Centerville residents, Avangrid Renewables personnel described the roadbed residents suggested for use as "too narrow." The causeway that leads from the Dowses beach parking lot to East Bay Road is exceedingly narrow, especially when high tides and storm water rise on both sides to be level with the surface.
3. Avangrid Renewables assured Osterville residents that the Dowses Beach area would remain accessible to them during construction. This will simply not be the case when the company runs an 8' to 11.5' wide trench the length of the causeway and under the existing culvert where water is exchanged between the bays. This would especially constitute a hardship for mobility-impaired persons for whom the handicapped accessible fishing pier provides a safe mechanism for waterfront access and sport.[2]
4. As we read the scientific research of the health effects of buried HVAC cables, we find no conclusions that their presence are entirely safe to marine life or to humans. Generations of Barnstable children learn to swim at the east end of Dowses Beach. Countless children play on and dig in the sand of this recreational beach. The proponent simply cannot guarantee that 1200 MW of electricity flowing through this beach in the water and onshore would have no deleterious health effects on them and their families, especially in the event that one of the three cables become damaged.
5. We ask that MEPA, and by extension, subsequent permitting agencies, become fully aware of media reports regarding the problematic business practices of Avangrid and its subsidiaries, especially as these relate to the states of Connecticut and Maine. We believe it is important to consider whether or not Avangrid Renewables is a trustworthy community partner.
6. Any "Host Community Agreement" between Avangrid Renewables/Commonwealth Wind and the Town of Barnstable that does not recognize the objections of a large number of the town's residents should not be considered representative.

Conclusion

Our group insists that we are not opposed to the development of wind power for the Commonwealth or to our town's clean water initiatives. We do ask that the Massachusetts Environmental Protection Act consider that the New England Wind 2 Connector is not at all in the best interest of the greater Dowses Beach environment, the many species of wildlife that make their home there, and the people for whom a safe, accessible public environment is to be preserved as a matter of environmental justice.

[2] Please see the blog of Garet Suomala, a resident of Hyannis with mobility issues, who describes why he finds the Dowses beach fishing pier ideal as it allows him to safely enjoy his favorite sport of fishing with fellow anglers. (myfishingcapecod.com).

From: Susan Mclean
To: Strysky, Alexander (EEA)
Subject: Public Comment
Date: Friday, November 25, 2022 7:08:32 PM

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Dear Alex:

I would like MEPA to know that I am totally against the proposed assault on Dowses Beach by Avangrid/Commonwealth Wind.

We have owned a house in Osterville for 42 years. As an artist , who paints largely in the open air in all seasons at Dowses Beach, I have observed the many birds who live on this beautiful fragile piece of land. The beach and dunes are home to endangered species; namely, piper plovers and least terns, both state-listed rare species. We also welcome a family of osprey every year with a specially built nest. We enjoy many species of Winter ducks, swans and many migrating birds making a stop at our beloved Dowses Beach. We also worry about the effect this invasive project will have on marine mammals, fish, seals and turtle species.
I received a letter from Mr. Gottlieb of APCC on October 27, in response to my letter, that stated that the Proponent should 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."
I'm wondering if Dowses Beach was an afterthought to this whole project. It seems like we are the guinea pigs in the rush to "get things done quickly" with little thought of the harm to this sanctuary for wildlife and residents.
Sincerely yours,

Susan O'Brien McLean
https://urldefense.com/v3/__http://Www.susanobrienmclean.com__;!!CUhgQOZqV7M!mk3Ml9aWY-E5b9VJZE59jn2ZY8FnnjTj8v8kt1KWZSrnJbqSajKTxNYpGEoqyyenYRquXkPgznnlDUH1fWf6vkI7knk$

Sent from my iPhone

From: Jack Cohen
To: Strysky, Alexander (EEA)
Subject: Comments to EEA #/MEPA ID #: 16611; Project Name: New England Wind 2 Connector in Osterville, MA (Dowses Beach)
Date: Saturday, November 26, 2022 8:33:57 AM

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Alex --

As suggested by you and others at the November 16th Meeting at the Osterville Public Library with local residents and representatives from Avangrid as to the Commonwealth Wind Project (the "Project"), please accept the following comments as matters that have spiked my concern as to the nature and the process by which this project has been rolled out, presented to the local citizenry and will undoubtedly cause environmental as well as economic damage both to the current pristine status of Dowses Beach and the newly reinvigorated local businesses, which are just now recovering from the impact of Covid. Please note that as my background is not in environmental science or energy issues, I remain well aware of the impact of the written word and the appropriate means to run an administrative process.

That said, it is imperative that we collectively step back and understand the context in which this matter should be viewed. The first tenet of the Hippocratic Oath is "First, do no harm." Applying such principle and perspective to this matter, it similarly has been written that "**Do no harm** means taking a step back from an intervention to assess the broader context and mitigate potential negative effects on the social fabric, economy and environment." See, Charancle, J.M.B. and Lucchi, E. (2018). Incorporating the principle of "Do No Harm": How to Take Action Without Causing Harm. Obtained from www.alnap.org/system/files/content/resource/files/main/donoharm_pe07_synthesis.pdf. Applying such principle to the Project, it is axiomatic that any and all alternatives be explored that would avoid, or at least greatly mitigate, the stated harm that will be caused to Dowses Beach and to ensure that the process is not a simple "find the shortest path between two points" mentality which was that which was expressed by the Avangrid representatives at the referenced meeting. The current status of the projects at Craigsville and Covell Beaches provide no such comfort as to either how they were presented to the public nor their current states of development and construction.

What causes me even further angst is trying to understand what the representatives of Avangrid have stated in some of their moving papers and whether they are simply making it up as they go along. Case-in-point is the pleading filed by the Avangrid legal team before the DPU in their Request for an INTERLOCUTORY ORDER ON COMMONWEALTH WIND LLC'S MOTION FOR A ONE-MONTH

SUSPENSION OF THE PROCEEDINGS on 11/4/2022. Therein, Avangrid sought a one-month suspension of the DPU's review of the Power Purchase Agreements ("PPAs") for the Project. Avangrid alleged that this suspension would allow the parties to examine the impact of the unprecedented commodity price increases, interest rate hikes and supply shortages on the overall viability of the Project. More precisely, Avangrid's counsel on page two of this pleading wrote that as to the current financial underpinnings "Commonwealth Wind maintains that the offshore wind generation project ("Project") underlying its PPAs with the Companies **is no longer viable**..." (emphasis added). Please note that counsel did not state that the Project may not be viable, but declared that it is not viable within the current cost and stated financial parameters.

Counsel's comment must be taken literally as all attorneys are obligated to be as accurate as possible in their pleadings or any documents filed with any court or administrative body. For example, Federal Rule of Civil Procedure 11 essentially states that any statements made within a pleading must be true and accurate to the best of the attorney's knowledge. I contend that if there was any ambiguity within the financial status of the Avangrid proposal that needed to be tweaked or modified, that is a far cry from an emphatic statement that the Project cannot be constructed as proposed. However, if counsel is engaging in Clintonian polemics as to the meaning of the term "is," there may well be a better forum for such comments. Thus, it was surprising and, in fact, inapposite to counsel's pleading, for a comment to be made subsequent to the DPU's rejection of the of the one-month suspension that a spokesperson for Avangrid said the company now "can present a proposal that would return the project to economic viability" and, according to Reuters, intends to present that information to the state in coming days as they remain committed to the project.

So, what is true and what is mere advocacy or argument.....what can the public rely on.....were they telling the truth in their pleading or were they simply posturing to get a "better deal?" Do we believe them when they say that the project will minimize environmental impact or should we believe what we now see at Covell Beach?

I request that this process be unwound, that a more viable and less impactful path be sought, that the original purposes of the Dowses family devise to Barnstable be maintained and that we avoid the fear of Judy Collins that we may otherwise "pave paradise and put up" not a parking lot but a windmill farm and cables that may well fulfill her wise admonition.

Thank you.

--
Jack R. Cohen
jrcohen24@gmail.com
941-740-3346

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From:	G Gerdy
To:	Strysky, Alexander (EEA)
Cc:	advmel.ed512@yahoo.com
Subject:	Commonwealth Wind must be stopped
Date:	Saturday, November 26, 2022 8:10:11 AM

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Good morning Mr. Strysky,

We hope this finds you well and that your Thanksgiving was a good one.

As you know, Avangrid's Commonwealth Wind project proposes to run a giant submarine cable under fragile, beautiful Dowses Beach, an estuarine environment hosting numerous wildlife; and an area that is enjoyed by summer visitors, fishermen, boaters and year-round walkers alike.

Our serious concern about Commonwealth Wind is that it will destroy a priceless natural environmental treasure PERMANENTLY in the name of creating clean energy.

What happens to the numerous birds that nest there, the fishes that swim there, the various wildlife that call the area home?

What happens to the health of the residents who will be subjected to the hazardously high electrical voltage emitted by the powerful cable?

We support clean energy but creating it needs to be done carefully and wisely.
This is NOT the case here.

Likewise, Avangrid's Christina Hoffman on November 16, 2022 at the Osterville village meeting stated that the lifespan of the equipment would be a brief 25 years. A mere 25 years!

Imagine
permanently destroying
an irreplaceable
priceless
estuarine
environmental treasure
that took thousands of years
for Mother Earth to create -
Our Dowses Beach -
All for a wind project with equipment bearing a lifespan of obsolescence -
of 25 short years -
Gone, useless, decayed in 25 years!

Then what happens to the obsolete cable when it stops working?
Does it get ripped up from Dowses Beach or will it remain a decaying hazardous relic under the water?

How does its dead presence affect the water? Poison it for the fishes and also leave fishermen with nothing to catch nor support themselves and their families? Poison the water quality so families, children, summer visitors can no longer swim?

Mr. Strysky, Commonwealth Wind must be stopped.

Preserving the quality of marine life at Dowses Beach is as important as creating clean energy.

Isn't it ironic that Avangrid’s quest to create clean energy is achieved through a dirty, destructive and decay-prone process?

Please help stop Commonwealth Wind now.

Thank you.
Maria and Greg Gerdy

From:	Greg Gerdy
To:	Strysky, Alexander (EEA)
Cc:	Greg Gerdy
Subject:	Consolidation with pre-existing cables - Commonwealth Wind
Date:	Sunday, November 27, 2022 9:33:26 AM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Good morning Mr. Strysky,

Regarding the Commonwealth Wind project by Avangrid:
wouldn't it be better - if not the best - for the environment if Commonwealth Wind's proposed giant submarine cable for fragile and priceless Dowses Beach is **consolidated** with other **pre-existing submarine cables already in place in Massachusetts?**

We support clean energy but Avangrid's permanent destruction of an irreplaceable environmental estuarine treasure that is fragile Dowses Beach is wrong.

Wrong for the environment,
wrong for Mother Earth,
wrong for future generations who will never experience the peace of the dunes, beauty of the wild nesting birds and nature's gift to fishermen that is Dowses Beach.

Please don't take this environmental treasure away from us and away from future generations.

Please fight and advocate for Dowses Beach by
a) supporting the consolidation of pre-existing submarine cables already in place in Massachusetts and
b) recommending to other permitting state, county and local agencies that Avangrid must find another more suitable location for their Commonwealth Wind project.

Stay safe and thank you for your help.
Maria Gerdy and family

November 28, 2022

Mr. Alex Strysky, Environmental Analyst
Massachusetts Environmental Policy Act Office
100 Cambridge Street
Boston, MA 02114

RE: New England Wind 2 Connector (EEA No. 16611)

Dear Mr. Strysky,

Thank you for the opportunity to offer my comments on the Commonwealth Wind application that is before the Massachusetts Environmental Policy Act Office (MEPA). We are taxpayers, residents, and business owners in Barnstable, residing in the village of Osterville. Cindy is a lifelong multi-generational Cape Codder.

We have been following the Commonwealth Wind project with great interest and wish to voice our support and urge approval by MEPA. After attending public meetings, reviewing the public material relating to the project and talking with local representatives, we have been impressed with the transparency and accessibility that the Commonwealth Wind team has demonstrated in this community.

We believe that by working cooperatively with Commonwealth Wind, the Town of Barnstable and its residents will gain numerous benefits. In fact, on November 3, the Barnstable Town Council voted unanimously to commence negotiations for a host community agreement. A critical benefit to the town in relation to this project is the coordination of electric cable and sewer installations. As you know, the Cape has a problem with nitrogen pollution in the groundwater. The region's reliance on septic tanks is no longer sustainable. It is my understanding that the Massachusetts Department of Environmental Protection recently sent a letter to officials in each of the Cape's fifteen communities about nutrient contamination -- describing it as one of the most pressing environmental challenges facing Cape Cod. Shortly thereafter, the DEP issued a proposed revision of Title V regulations creating "Nitrogen Sensitive Areas" in places like Barnstable. This will mandate that existing septic systems in those designated areas be upgraded to sewer over the next decade.

Constructing an underground sewer system can be an onerous and expensive proposition for any municipality. With this project, Commonwealth Wind will coordinate with the planned installation of a municipal sewer line along the onshore route to minimize disruption and defray some of the town's sewer line roadwork costs. This will result in the ability for property owners to connect to

sewers at a quicker pace and help mitigate the nitrogen issue to comply with new state water quality regulations.

As taxpayers, residents, and business owners, we view this as a win-win for Osterville, Barnstable, and the Commonwealth and we urge your approval.

Sincerely yours,

Brian and Cindy Dacey
45 Little Island Drive
Osterville, MA 02655
brian@baysidebuilding.com

From: Carol Zais
To: Strysky, Alexander (EEA)
Subject: Strong SUPPORT for AVANGRID New England Wind Connector 2
Date: Monday, November 28, 2022 5:37:10 PM

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Dear Mr. Strysky,

Thank you in advance for taking the time to consider my comments on the New England Wind Connector 2, currently before the Massachusetts Environmental Policy Act Office. I wish to voice my strong support for both AVANGRID's third project, Commonwealth Wind, as well as its grid interconnection in Barnstable, New England Wind Connector 2.

Both AVANGRID's Vineyard Wind 1 Connector and New England Wind 1 Connector have both been approved by the state, and New England Wind Connector 2 builds upon the first two projects-- New England Wind Connector 2 will use the same installation methods, will follow a similar shared corridor below the seabed, and connect to the grid in the town of Barnstable.

AVANGRID has demonstrated in its other projects and continues to demonstrate with New England Wind Connector 2 that it has performed all necessary due diligence with respect to environmental safety plans for landing cables under Dowses Beach in Barnstable. Construction work will be entirely limited to the paved areas of the beach's parking lot. No construction will occur along the coastal beach or dunes, as a result of the companying employing the horizontal directional drilling (HDD) methodology which avoids impacts to these coastal resources by burying the cable deep beneath the surface.

AVANGRID has the proven expertise and has demonstrated to the town their desire to be a partner. Barnstable's Town Council just recently voted unanimously to begin Host Community Agreement negotiations for Commonwealth Wind. I urge you to expeditiously review and approve New England Wind Connector 2.

Respectfully,

Carol Zais
86 Putnam Ave
Cotuit, MA 02635
508-561-2936
Carolzais@me.com

The Commonwealth of Massachusetts
Division of Marine Fisheries
251 Causeway Street, Suite 400, Boston, MA 02114
p: (617) 626-1520 | f: (617) 626-1509
www.mass.gov/marinefisheries

CHARLES D. BAKER
Governor

KARYN E. POLITO
Lt. Governor

BETHANY A. CARD
Secretary

RONALD S. AMIDON
Commissioner

DANIEL J. MCKIERNAN
Director

November 28, 2022

Secretary Bethany A. Card
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky, EEA No. 16611
100 Cambridge Street, Suite 900
Boston, MA 02114

Dear Secretary Card:

The Division of Marine Fisheries (MA DMF) has reviewed the Environmental Notification Form (ENF) by Commonwealth Wind LLC for the New England Wind Connector 2 project.

The proposed project seeks to install three 275 kilovolt (kV) high voltage alternating current (HVAC) offshore export cables, a 6.7-mile underground concrete duct bank, and a new onshore substation. The proposed offshore cable would connect 64 to 88 offshore wind turbine generators (WTGs)/electrical service platforms (ESPs) located in Lease Area OCS-A-0534 to a landfall site at Dowses Beach in the Town of Barnstable. The project would go through the town waters of Edgartown, Nantucket, Barnstable, and Mashpee. The proposed cable route would largely follow the established Offshore Export Cable Corridor (OECC) associated with the Vineyard Wind 1 Connector and New England Wind 1 Connector Projects, which travels along the eastern side of Muskeget Channel, towards landfall at Dowses Beach. The OECC has a typical width of 3,500 feet, ranging from 3,100 to 5,500 feet. Potential new areas outside the OECC include a section through Centerville Harbor required to reach the Dowses Beach Landfall Site as well as a Western Muskeget Variant. This is included in the event that prior cable installations within the OECC preclude installations associated with the current project.

Cable protection is anticipated with total estimated area of impact varying depending on the need for the Western Muskeget Variant. The lowest area of cable protection would be achieved if all three cables are maintained in the OECC (29.4 acres), with impact areas increasing to 23.5 and 35.6 acres if one or two cables, respectively, need to be routed through the Western Muskeget Variant. Target burial depth for the offshore portion is five to eight feet with cable protection anticipated if a minimum depth of three or five feet cannot be achieved in low and high anchor strike risk areas, respectively. For areas where burial is not feasible, hard structures may be used as cable protection in the form of rock, gabion rock bags, concrete mattresses, or half-shell pipes.

The overall cable corridor would traverse 47.2 miles, 21.9 miles of which would be within state waters. The offshore portion is proposed to be installed using a lay and bury method with either jetting or mechanical plow while the nearshore section would be installed using horizontal directional drilling (HDD). In areas containing sand waves, dredging is anticipated to achieve adequate burial depth. Proposed dredging methods consist of trailing suction hopper dredge (TSHD) or jetting by controlled flow excavation. If TSHD is used, dredge material would be transported and deposited elsewhere within the surveyed area containing sand waves. Up to 131,100 cubic yards of dredging may occur in 27 to 33 acres of state waters for the installation of all three cables. Cable installation in state waters is estimated to impact 104 to 110 acres with an additional 26 to 27 acres of impact anticipated from the use of jack-up and/or anchored vessels.

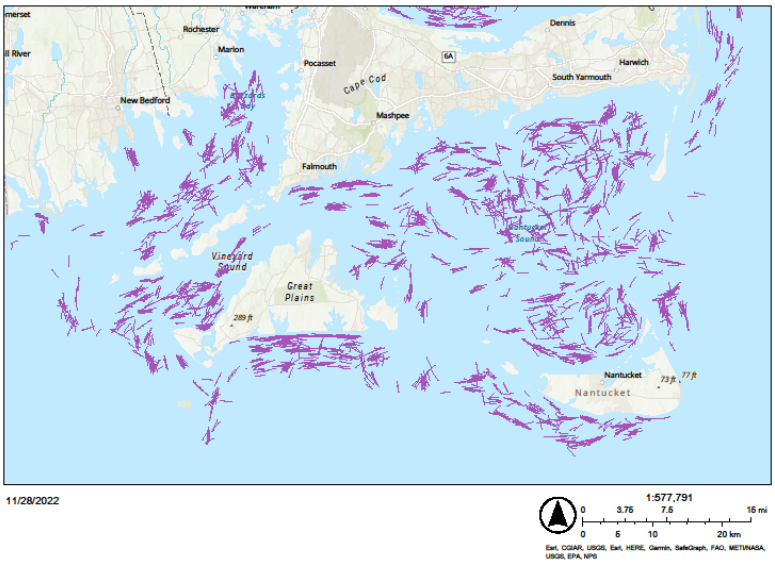
Existing marine fisheries resources and potential project impacts are described in Attachment 1. The primary resources of concern in Nantucket Sound that are vulnerable to the adverse effects of cable laying and EMF include (but are not limited to) shellfish, longfin squid (*Doryteuthis pealeii*) and squid eggs, knobbed whelk (*Busycon carica*) and channeled whelk (*Busycotypus canaliculatus*), and flatfish. Both commercial and recreational fisheries are active throughout the OECC area.

MA DMF offers the following comments on DEIR content referenced in the ENF for consideration in developing the Draft Environmental Impact Report (DEIR):

<u>MA DMF permits and affected activities</u>

- Through the "Nantucket Sound exception" included within the Magnuson Act, MA DMF exerts fisheries jurisdiction across all waters within Nantucket Sound [1]. A Letter of Authorization from MA DMF will be needed for any activities that could result in the collection of fishing gear in Nantucket Sound and Massachusetts state waters. A Scientific Permit from MA DMF will be needed for any activities that could result in the collection of marine plants or animals in Nantucket Sound and Massachusetts state waters.
- The MA DMF bottom trawl survey operates throughout Nantucket Sound annually during spring and fall (Fig. 1). Coordination with MA DMF is recommended to ensure lack of direct conflict with this survey during survey activities and cable installation. Furthermore, cable installation, even at the targeted 5-8 foot depth, can impact future MA DMF bottom trawl activity in the corridor. Potential impacts to this long-running survey should be considered in the DEIR and in the final routing decision. Providing post construction coordinates and shapefiles of cable route(s) with cable depth (armored, 0 - <3', 3' - target depth 5-8') is critical. NOAA captains use this information when conducting the bottom trawl surveys to determine towable areas.

Figure 1. MA DMF Resource Survey Tow Locations 1978-2019



An up-to-date description of the Affected Environment

- Dredging and cable trenching will likely impact existing marine resources that are sessile or with limited mobility (e.g., shellfish, whelks, squid eggs). These vulnerable species should receive particular attention in terms of documenting their distribution along the OECC as well as strategies for minimizing impacts to these resources. Many species trends have been affected due to warming waters, so characterization of these resources should be informed by up-to-date analyses of trawl survey data and other available data sources.
- Through the Ocean Plan, the Commonwealth established a standard substrate map. We would like to see that the data produced by this effort be compatible with that substrate map, since it underlies the interpretation of hard/complex seafloor. The maps shown in the ENF are useful and illustrative, but it is more helpful to have the data in an online viewer and available for viewing in our own GIS systems. Toward that end, substrate analyses from project survey work should be produced in the same Excel spreadsheet as the Commonwealth's substrate data and interpreted substrate units should be produced as an ArcGIS shapefile or geodatabase. All data should be provided digitally in formats compatible with ArcGIS to enable comparison with existing datasets. Acoustic mosaics should be provided as geotiffs at the maximum resolution possible. There should be at least four geotiffs provided: multibeam backscatter, sidescan sonar backscatter, multibeam bathymetry, and backscatter draped on bathymetry. The date of data collection should be easily discernable for all products.

An expanded discussion of how scheduling, sequencing, and communication can be used to minimize impacts to fish and fisheries

- Many potential impacts to marine resources and associated fisheries can be minimized by timing cable installation activities to avoid seasons of vulnerable life history phases and/or concentrated fishing effort along the OECC. The DEIR should describe planned

timing of cable-laying activities with regards to co-occurring marine resources and stakeholders. The proponent's experience with Vineyard Wind 1 Connector and New England Wind 1 Connector Projects should be used to identify the communication mechanisms and stakeholder partners that will enhance coordination with fishermen.

- Potential prohibition or relocation of fishing (fixed or mobile gear) for any length of time as a result of survey, installation, or repair procedures should also be described. The size, length, and potential economic impact of closures should be included in the description.

Description of overall economic impact to fishing industries

- The DEIR should present an analysis describing the potential economic impact on Massachusetts fishing industries associated with the Park City Wind Project and VW2. The analysis should include impacts on individual ports, as well.
- Economic analyses should rely on the most up-to-date methods and datasets developed through the Mass CEC pilot studies projects and/or NOAA analyses.
- Providing a range of potential impacts, including a no-fishing alternative, is needed.
- A clear explanation of how the proponent is working toward mitigation agreements and how it is supporting regional impact monitoring is needed.

An expanded discussion of cable covering

- Anticipated areas requiring covering should be described in greater detail, both in terms of the spatial distribution and existing habitat characteristics. Relative impacts to benthic habitat associated with the Western Muskeget Variant should be further described in the DEIR to more thoroughly assess the relative impact of this alternative. The DEIR should also describe the likelihood of concrete mattresses or rock material affecting fishing activities.
- Information related to the habitat equivalency of rock placement, gabion rock bags, concrete mattresses, or half-shell pipes of cables should be provided and should cite relevant literature. The concrete mattresses are estimated to occupy less seafloor, but if the rock cover has a higher habitat value, it may be the preferred alternative despite occupying more seafloor

A detailed discussion of all installation methods proposed for offshore cables

- MA DMF recommends that the proponent develop a comprehensive contingency plan in the DEIR outlining response protocols for a frac-out event for the horizontal directional drilling (HDD) alternative for nearshore installation. Plans should include how frac-outs will be avoided, as well as actual response and containment plans.

Presentation of monitoring plans

- Monitoring plans should be developed with input from the Agencies and should include annual reporting.
- All monitoring plans should clearly identify the questions being addressed (i.e. the objectives of the monitoring plan).

Electric and magnetic fields (EMF) and cable burial

- Since cable burial will be relied upon to minimize adverse effects associated with EMF transmission, the EMF analysis should include a thorough description of how cable burial

will be monitored on a regular basis to ensure the entire length of the cable will remain buried.

Cumulative impacts

- Multiple cable laying activities over time increase seafloor impacts and impacts to fishing activities. The DEIR should include a proposed schedule that clarifies how this project's timing compares to Vineyard Wind 1 and New England Wind 1.

Questions regarding this review may be directed to John Logan in our New Bedford office at john.logan@mass.gov.

Sincerely,

Daniel J. McKiernan

Director

cc: Barnstable Conservation Commission
Mashpee Conservation Commission
Edgartown Conservation Commission
Nantucket Conservation Commission
Marc Bergeron, Epsilon Asssociates
Sabrina Pereira, NMFS
Rebecca Haney, Robert Boeri, CZM
Rachel Croy, Ed Reiner, EPA
Brendan Mullaney, David Wong, DEP
Tori LaBate, DFG
Amanda Davis, Emma Gallagher, Steve Wilcox, Robert Glenn, Mark Rousseau, Melanie Griffin, Kelly Whitmore, Tracy Pugh, Derek Perry, DMF

DM/JL/sd

Attachment 1: Description of the Affected Environment, Nantucket Sound

The waters within Nantucket Sound and adjacent state waters along the proposed cable routes traverse habitat for a variety of finfish and invertebrate species (Figures 1 and 2). The Massachusetts Ocean Plan [1] identified several areas of important fish resources based on MA DMF trawl survey data (2015 Massachusetts Ocean Plan Figure 15). In particular, commercially and recreationally important species with high abundance in this region include channeled whelk (*Busycotypus canaliculatus*), knobbed whelk (*Busycon carica*), longfin squid (*Doryteuthis pealeii*), summer flounder (*Paralichthys dentatus*), scup (*Stenotomus chrysops*), and windowpane flounder (*Scophthalmus aquosus*) (Figures 1 and 2). Of these species, summer flounder, scup, and knobbed whelk are abundant throughout Nantucket Sound while channeled

whelk, longfin squid, and windowpane flounder are in greater abundance further east along Nantucket Sound.

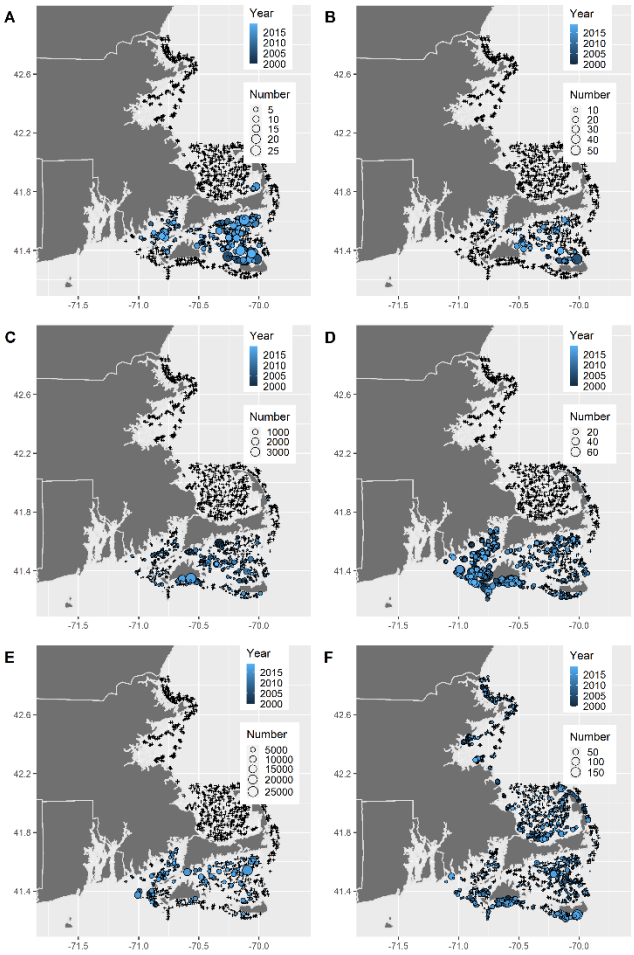


Figure 1. Abundance of select recreationally and commercially important fish and invertebrate species in Massachusetts spring bottom trawl surveys from 2000-2019. Tows for which the species of interest were absent are indicated by (+). Panels represent seasonal abundance of A) channeled whelk, B) knobbed whelk, C) longfin squid, D) summer flounder, E) scup, and F) windowpane flounder.

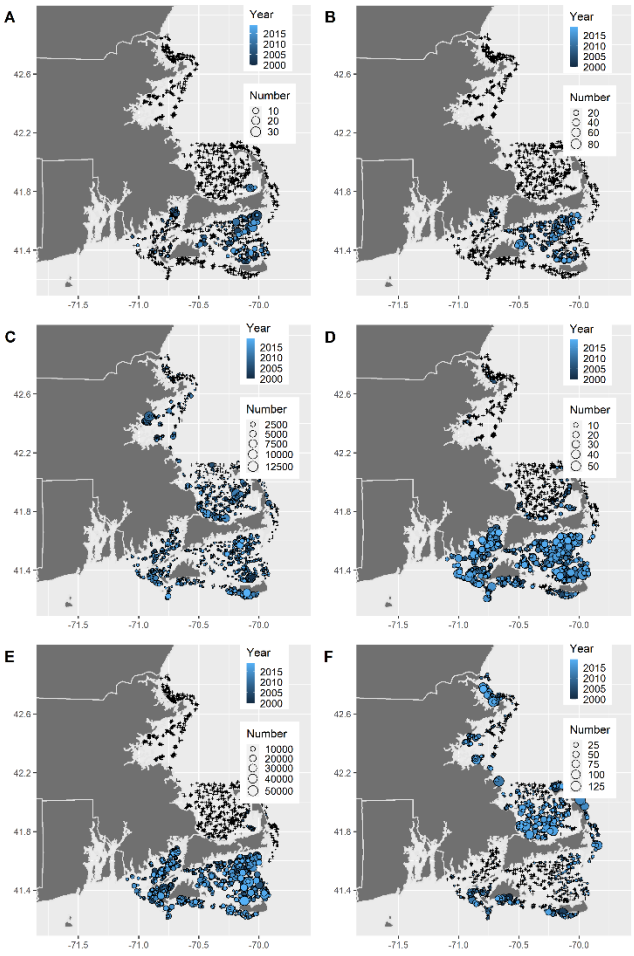


Figure 2. Abundance of select recreationally and commercially important fish and invertebrate species in Massachusetts fall bottom trawl surveys from 2000-2019. Tows for which the species of interest were absent are indicated by (+). Panels represent seasonal abundance of A) channeled whelk, B) knobbed whelk, C) longfin squid, D) summer flounder, E) scup, and F) windowpane flounder.

Of the species identified in trawl survey data, whelks and squid are particularly sensitive to benthic habitat disturbance due to limited mobility and deposition of demersal eggs, respectively. Recent stock assessments indicate that the whelk stock in Nantucket Sound is overfished and overfishing is still occurring. The biomass index based on the MA DMF trawl survey has declined by over 70% since the early 1980s. Longfin squid spawn in the spring in Nantucket and Vineyard Sounds and lay demersal egg clusters (i.e., mops) with peak activity in May [2-4; Fig. 3]

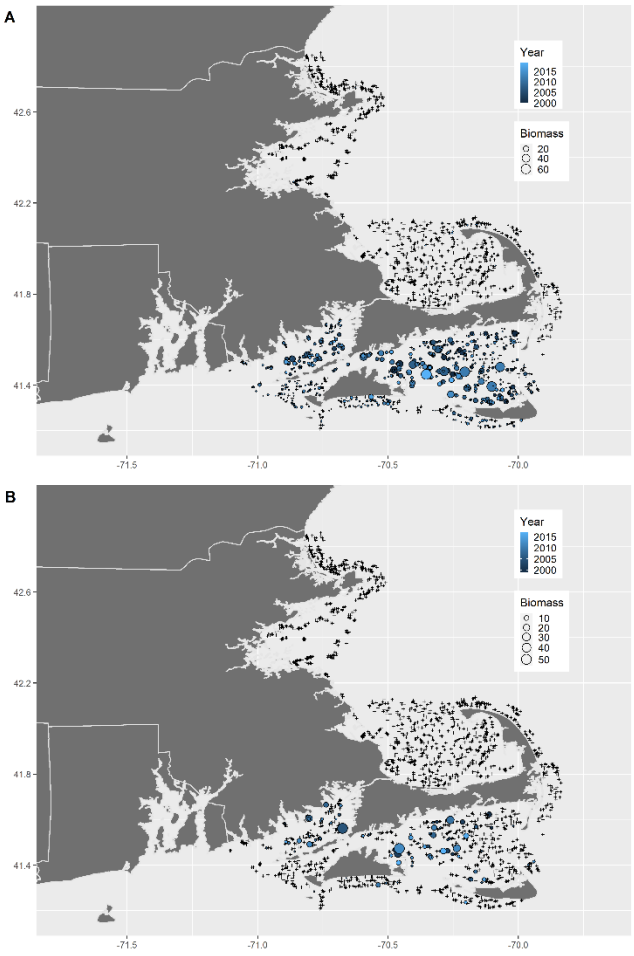


Figure 3. Biomass (kg per tow) of A) longfin squid and B) longfin squid demersal egg in Massachusetts spring bottom trawl surveys from 2000-2019. Tows for which the species of interest were absent are indicated by (+).

The cable route through Nantucket Sound also includes habitat for a variety of shellfish species. The offshore waters between Martha's Vineyard and Nantucket are mapped surf clam (*Spisula solidissima*) habitat. The OECC also closely borders sea scallop (*Argopecten irradians*), quahog (*Mercenaria mercenaria*), and blue mussel (*Mytilus edulis*) habitat.

The various finfish and invertebrate resources along the cable corridors also support a variety of associated fisheries. The Massachusetts Ocean Plan [1] identified several areas of medium and high commercial fisheries activity and concentrated recreational fishing activity within the proposed cable route (2015 Massachusetts Ocean Plan Figures 16 and 28). Nantucket Sound waters within and adjacent to the proposed cable route are also classified as areas of high recreational boating density [5]. The commercial whelk fishery targets both channeled and knobbed whelk and is an important state-waters only fishery in Massachusetts that has expanded in recent years due to declines in southern New England lobster resources and increased whelk prices [6]. The channeled whelk fishery is of particular economic importance and annually ranks among the top fifteen in terms of ex-vessel value landings in Massachusetts. Based on dealer reports, nearly two million pounds of channeled whelk were landed in 2016 with an estimated

value of $4.8 million USD. Most of these landings are derived from fisheries in Nantucket Sound (Figures 4 and 5). Blue mussel (*Mytilus edulis*) and kelp (*Saccharina latissima*) aquaculture operations are also present or in the process of being permitted for deployment within Horseshoe Shoals in close proximity to the proposed cable corridors.

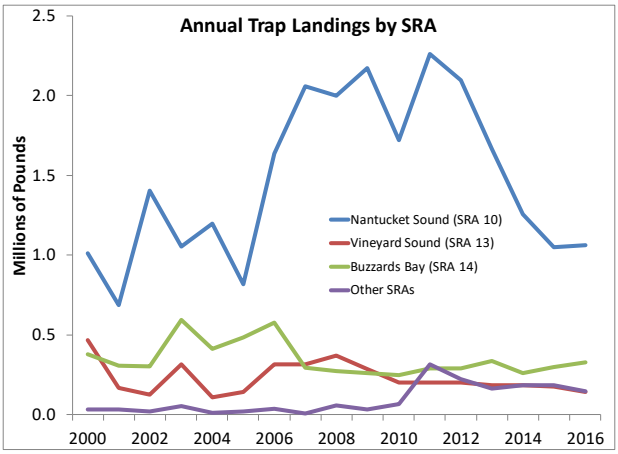


Figure 4. MA channeled whelk landings 2000 – 2016 Source: MA Commercial Catch Reports [6].

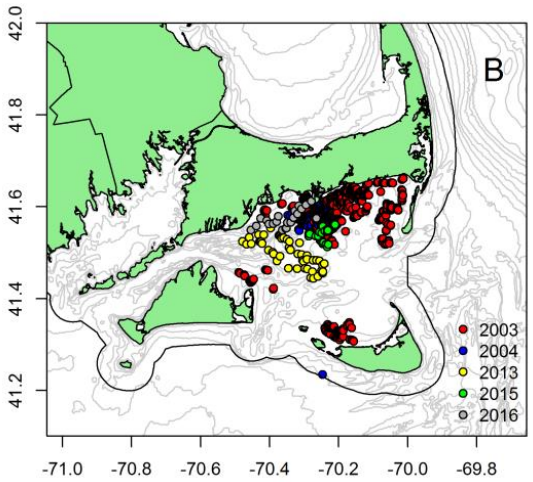


Figure 5. Locations of yearly commercial sampling effort in the Massachusetts whelk fishery, MA DMF [6].

Nantucket Sound is also the epicenter of the horseshoe crab (*Limulus polyphemus*) fishery for the state of Massachusetts with > 80% of landings derived from this general region (Figure 6).

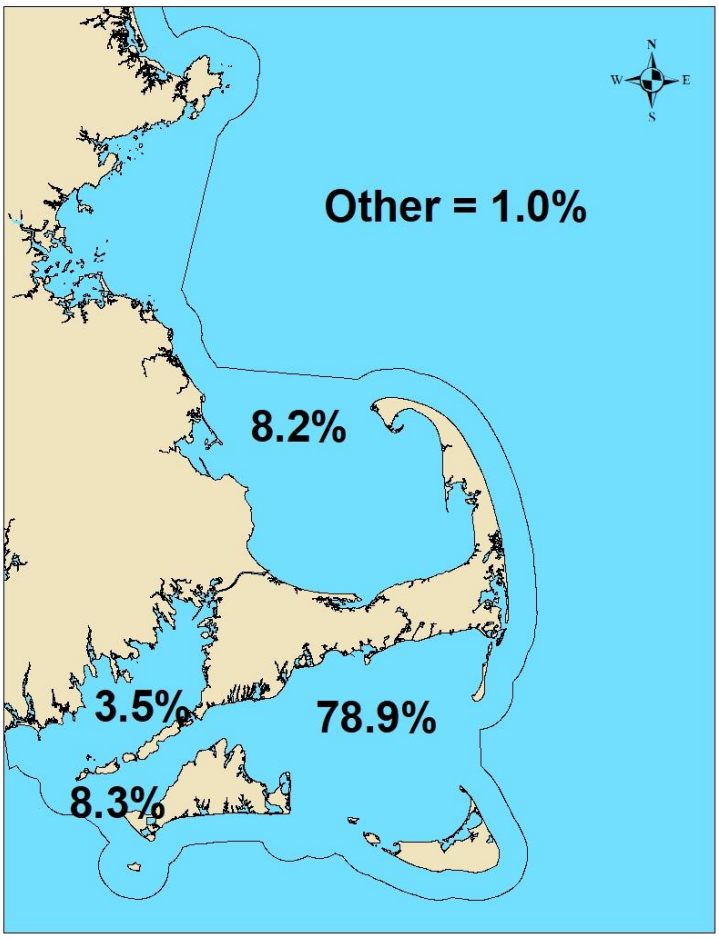


Figure 6. Landings data for the 2018 Massachusetts horseshoe crab fishery reported as percentages by region. The Nantucket Sound region accounted for 83% of state landings.

Waters within Nantucket Sound also provide habitat for a variety of whale and sea turtle species. An area of right whale (*Eubalaena glacialis*) core habitat is present south of Martha's Vineyard in close proximity to the proposed cable corridor (2015 Massachusetts Ocean Plan Figure 24) while loggerhead (*Caretta caretta*) and leatherback (*Dermochelys coriacea*) sea turtles have been observed throughout Nantucket Sound [1,7].

Nearshore waters off the proposed Craigville Beach and Covell's Beach landfall sites provide habitat for a variety of marine flora and fauna. The shoreline at both considered landfall sites is mapped as a horseshoe crab nesting beach. Horseshoe crabs deposit their eggs in the upper intertidal regions of sandy beaches from late spring to early summer during spring high tides [8]. Adult crabs congregate in deep waters such as channel areas and troughs during the day while waiting to move on to the beaches at night to spawn. Adults will also overwinter in these deeper water areas. Recent stock assessments conclude that horseshoe crab abundance in the New England region has improved from poor to neutral [9]. The waters offshore of the eastern and western ends of the landfall sites have been mapped previously by the Massachusetts Department

of Environmental Protection (MA DEP) as eelgrass (*Zostera marina*) meadows (Fig. 7). Eelgrass beds provide one of the most productive habitats for numerous marine species [8] but have declined statewide in the past decade [10]. The waters offshore of the landfall sites are also mapped surf clam (*Spisula solidissima*) habitat.

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From: MEPA (EEA)
To: Strysky, Alexander (EEA)
Subject: Fw: New England Wind 2 Connector
Date: Monday, November 28, 2022 2:26:07 PM

From: capemegathlins@verizon.net <capemegathlins@verizon.net>
Sent: Saturday, November 26, 2022 4:37 PM
To: MEPA (EEA) <mepa@mass.gov>
Subject: New England Wind 2 Connector

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To Whom It May Concern,

We are writing to express our strong belief that Dowses Beach, in Osterville, MA, should NOT be used as the landing place for the final wind turbine project to be located on Cape Cod. The beach is a remarkable asset to the Town of Barnstable residents, and as such should not be considered as a location for the venture being proposed. The pristine condition of the beach, its physical configuration as a small peninsula adjacent to the mainland, its qualities of accessibility for the handicapped, its relatively small size compared to the population it serves, and its status of being home to so many shore birds, some of them endangered, are all reasons for allowing it to be left free from construction projects seven months a year.

We are strongly in favor of off-shore wind projects, and believe that the construction at Covell's Beach and Craigville Beach certainly fulfill the Cape's responsibility to provide sites. Look for favorable sites in other areas, now that the Town of Barnstable has cooperated to ensure that these wind projects happen. Leave Dowses Beach alone!

Sincerely,
Don and Karen Megathlin
P.O. Box 125
Cotuit, MA 02635

From: MEPA (EEA)
To: Strysky, Alexander (EEA)
Subject: Fw: New England Wind 2 Connector
Date: Monday, November 28, 2022 2:26:16 PM

From: Edward McCormack <edward.mccormack2018@gmail.com>
Sent: Saturday, November 26, 2022 3:57 PM
To: strysky@mass.gov <strysky@mass.gov>; MEPA (EEA) <mepa@mass.gov>
Subject: New England Wind 2 Connector

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This is to comment and request further study on the Electro Magnetic Force created by the connecting cable on land from the subject project. My understanding as of the 11/16/22 meeting at the Osterville public library is that three cables in one duct bank will carry the proposed 1200 megawatts through Dowses Beach, Wianno Avenue and the village center of Osterville out to the grid connection at Route 6. My concern is the EMF effect and distance safety for all human population at the beach and roadways to the grid connection. If the EMF effect for an underground cable is the same or similar to overhead high tension power lines, safety will be an issue not to mention real estate values. We should have qualified Mass State engineers investigating and reporting on the EMF effects and not relying on Avangrid engineering consultants and their numbers. I'm assuming the human population is very much a part of the environment.
Thank you for this consideration,

Edward McCormack
18 Woodland Ave.
Osterville, MA 02655

From: Hector Guenther
To: Strysky, Alexander (EEA)
Subject: Project ID 16611/ENF for New England Wind Connector 2
Date: Monday, November 28, 2022 8:28:34 PM
Importance: High

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr. Strysky,

As a concerned citizen and resident of Barnstable, Massachusetts, I write to oppose the proposed landing by Commonwealth Wind LLC, a subsidiary of Avangrid, Inc., of three 275-kilowatt HVAC export power cables at Dowses Beach in Osterville, MA.

Dowses Beach is a peninsula. It encompasses a narrow strand and dune system that fronts an estuarine environment. It is home to abundant wildlife, features a handicapped accessible fishing pier, and is accessed by a narrow causeway that divides two environmentally fragile bays.

I am not opposed to wind power or renewable energy. Indeed, deploying new, non-fossil fuel energy sources is essential to combat climate change. I am, *however, vehemently against landing the power cables at Dowses Beach.* Dowses is a unique and beautiful Cape Cod treasure. I especially worry about the impact of this project on the many species of birds, animals and sea life that use the strand, the dune system and the waters of the bay throughout the year. This project has the potential to permanently alter the delicate ecological balance of animal, bird and sea life in the greater Dowses Beach area.

Provided below are my observations and questions regarding the project sponsor and the proposed landing site:

1. **The sponsor has not given sufficient consideration to safer alternative landing areas**. Massachusetts has hundreds of miles of coastline, including numerous areas where industrial and commercial activities are presently located on that coastline. Commonwealth Wind has real, viable alternative landing areas, including Brayton Point, Acushnet, Fall River, the site of the decommissioned Pilgrim Nuclear Power Station in the Manomet section of Plymouth, and the City of Boston. All of these sites contain electrical substations that can handle or

could be upgraded to handle the amount of power that is proposed.

2. **I question Avangrid's experience, technical capabilities and its ability to perform in this project**. The core competency of Avangrid, Inc. is that of a regulated electricity and natural gas delivery business that operates eight utilities in Connecticut, Maine, Massachusetts and New York. This core business accounted for 83% of Avangrid's 2021 revenues. Avangrid also operates renewable energy businesses consisting principally of onshore wind farms (15% of 2021 revenue) and a small amount of solar and thermal.

   Offshore wind power is a wholly new business for Avangrid. The company has zero experience in developing, constructing and operating offshore wind projects. I question Avangrid's competence and capability to complete a project of this scale and technical complexity – and I am very concerned that mistakes can and will be made that will permanently alter the ecology of Dowses Beach.

3. **I question Avangrid's staying power and commitment to this project.** Avangrid secured the leases for its three proposed wind farms, one of which is Commonwealth Wind, several years ago at a very low price. On recent investor calls, Avangrid has spoken of the enormous value of those leases, now that the federal and state governments have made offshore wind such a high policy priority. Avangrid, like all major corporations, is opportunistic. CEO Pedro Azagra has hinted that if the company's second and third offshore projects – Park City Wind and Commonwealth Wind – don't come to fruition, the company may "realize" significant value by selling some or all of the lease rights to another developer.

4. **Avangrid's behavior in the earliest stages of the permitting process for Commonwealth Wind gives rise to concerns about its trustworthiness and truthfulness.** On October 21, 2022, Avangrid filed with the Massachusetts Department of Public Utilities (DPU) a request that DPU suspend its review of three related Power Purchase Agreements for one month. The reason for the delay? "The world has changed," and Avangrid said the PPA contracts, which the company heavily negotiated and signed recently, in April 2022, *are no longer economically viable for the company!*

In a same-day press release, Avangrid said:

"A one-month suspension in the proceeding provides a needed opportunity for AVANGRID, the Massachusetts Electric Distribution Companies, state and regulatory officials, and stakeholders to evaluate the current economic challenges facing Commonwealth Wind and assess measures that would return the project to economic viability *including, but not limited to, modest changes to the PPAs*. [my emphasis]"

In its third quarter earnings call on October 26, 2022, Avangrid CEO Pedro Azagra was asked the following question by a security analyst: "If the Massachusetts Commission does not grant a higher PPA, will you move forward with the project?" He responded, "The answer is we need to – those revisions in order to continue with the project. We just need that." Answering a follow up question, Azagra said: "Yes. No doubt. We need that."

Azagra added: "…the value as you can see of just the leases of those projects is huge. So from that point of view, I think you know, there is a value in those assets, whether you go ahead with the project now, later or you just cancel them and start again, the leases are worth a lot."

In other words, Avangrid wants to fundamentally change the terms of the PPA contracts the company just negotiated and agreed to! Either that, or the company may seek to realize value by selling the leases.

5. **I question Avangrid's managerial and financial competence and assess their counterparty risk in this project to be very high, bordering on unacceptable.** In press reports and on calls with Wall Street analysts, Avangrid has listed various reasons why the world has changed and why it therefore needs to secure better terms in the PPAs. The company's laundry list includes:

   Persistent inflation
   Sharp and sudden increases in interest rates
   Higher capital costs
   Historic price increases for global commodities
   The war in Ukraine

Prolonged supply chain constraints
The need for project synergies (possibly merging Park City and Commonwealth Wind)
Economies of scale
Grid improvements
Engineering optimizations
New, larger wind turbines
Impact of the Inflation Reduction Act

My comment is: None of these factors are new. *All were present and known when Avangrid signed the PPAs only seven months ago, in April 2022.*

A leading U.S. utility expert I spoke to said they were "absolutely flabbergasted" by Avangrid's request to reopen the PPAs. This analyst said that Avangrid won the rights to negotiate the PPAs in an open and transparent process run by the Massachusetts Department of Public Utilities. The analyst said, moreover, that if they were in the shoes either of the utility companies (the buyers) or DPU, they would refuse to renegotiate the PPA contracts. Instead, this analyst said, the bidding process should be reopened to other developers.

Given the uncertainties around Avangrid's technical competence in offshore wind and its trustworthiness to perform its contractual obligations, I am very concerned about potentially irreversible impacts that the proposed landing of power cables may have on Dowses Beach. Given that the company has reportedly budgeted $5 billion for the Commonwealth Wind project, I believe they have the ability to find a more appropriate and less risky site to land these cables. MEPA should demand that Avangrid look elsewhere for a more appropriate landing site. I urge you and the team at MEPA to reject this project.

Kind regards,

_____

Hector Guenther

November 28,2022

Alex Strysky, Analyst
MEPA
Office of Energy and Environmental affairs
Boston, MA

Dear Sir,

My wife and I are writing to you to protest the planned landing of three industrial high voltage electrical cables by AVANGRID and their Commonwealth wind project at Dowes Beach in Osterville, Massachusetts.

We are fortyfive year residents of the Town of Barnstable and the village of Osterville. We have raised four children here and spent hours year round on the sand of Dowes Beach.

I am an Obstetrician & Gynecologist at Cape Cod Hospital where I have served as the Chairman of the Department of Obstetrics and Gynecology, Hospital Chief of Staff of over 400 doctors and served on the Board of Trustees of Cape Cod Healthcare.

I am a lifelong sailor and fisherman and are very familiar with the waters from Newport, R.I. to Boston. I have raced in offshore events such as the Marion to Bermuda Race.

My wife and I are deeply concerned of the unproven safety of these Commercial high voltage cables and the electronic magnetic field to the health of our children, grandchildren and neighbors. We are also disturbed by the environmental impact of the most convenient site chosen by Avangrid when a project such as this should be brought ashore at a commercial location.

There is proof that the electronical magnetic fields produced by these cables have been linked to childhood leukemia and brain cancer. Are we going to place three of these industrial size cables, yet to be produced, yet to be tested and yet to be used anywhere and to be made for the first time in New Bedford under a fragile barrier beach which thousands of Barnstable residents enjoy year round and where our children build sand castles?

This site is a health and safety mistake. It must be stopped and relocated.

Avangrid has presented no proven safety and health data on these not yet to be produced cables or any other cables.

The environmental impact of this site is staggering to this pristine barrier beach. It is not only a peaceful haven to our residents year long but protects and allows for the aquatic and bird life of East Bay, the Centerville river, Scudder Bay and the Craigville marshes behind craigville beach.

Have you truly considered the whole area of impact? Bringing the industrial cables across the narrow isthmus connecting to the mainland will without a doubt ruin the spawning pond of the multiple fish species not only during the multiple years of construction but possibly forever.

What of the multiple nests in the whole area of the endangered piping plover and the magnificent Ospreys. They and other species will be harmed not only by the wind turbines themselves but for certain by the years of heavy equipment and construction.

The impact of the wind turbines vibration themselves in the migration of fish and especially whales goes without question.

The impact to our small village roads and movement about town and the impact to the economy of our small businesses will be staggering. It will also be felt for years.

The convenient landfall for Avangrid project is not going to be tolerated by the residents of Osterville Village and the interruption of essential services of fire, police and ambulances.

The addition of the sewer project is a tempting ploy by Avangrid. Osterville is the last needed location of the sewer project as home lots are large here and many homes are used in the summer only. Waste water is handled with ease.

The disruption to the Covell beach and the entire Hyannis area by the Vineyard Wind Project is a living example of the disruption and destruction these projects create. They never stay on schedule and never restore the sites areas to their original habitat.

Avangrid claims they can only tap into the power grid on the Cape. This seems ridiculous. I also question how this may impact the ability to use the power lines on the Cape for future electrical needs for down Cape homes and business. Has this been answered?

Comparisons to wind farms in Denmark are invalid. There are no hurricanes in Denmark. Denmark has had multiple problems with their cables. Horizontal drilling projects are usually done in remotes areas where there is adequate space for the equipment and it can be done without disruption of the surrounding area.

The effects of Global Warming have also not been accounted for. There will be changes in the wind production as heat gradients change. This will render wind farms less effective producers of clean energy. The destruction and cost to benefits ratio must be re-evaluated.

Rising ocean levels will make Hydro power production even a greater leading source of clean energy than the 71% worldwide position it now occupies.

Evidence based medicine is how we care for people in the 21st Century.

Where is the evidence based testing and data on the commercial electrical cables proving that there is no health and safety risks especially when placed in the middle of a small residential village. None has been presented.

The impact on our fragile, ecological treasure will be great and long lasting.

Dowes Beach is the only beach in Osterville that is reserved for the residents of Barnstable. It is also the only beach that has a boardwalk for the handicap to get to the water for a swim and it's the only beach that has a handicap fishing pier.

Cape Cod is one of Massachusetts diamonds. It must be protected and preserved for our future generations. Dowes Beach or anywhere on the Cape and Islands should not be used for the convenience of Avangrid. It should not be sacrificed to attain a quota on clean energy production. This is poor technology in the wrong place.

My wife and I ask that your diligently review this project for proven data based evidence for the health and safety issues. We ask that you review the multiple issues of the environmental impacts both on nature and the citizens of the village of Osterville. This project should not be allowed to be permitted.

Sincerely,

Joseph J. Conway, M.D.
Patricia A. Conway, R.N
920 Main Street
1-3
Osterville, MA
Jconway50@aol.com
Tac1949@gmail.com

From: peter hansen
To: Strysky, Alexander (EEA)
Subject: Dowses Beach
Date: Monday, November 28, 2022 11:06:28 AM

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Dear Alexander - I am the vice president of the Osterville Village Association and have spent my whole life in Osterville (swam at Dowses Beach every summer when growing up). I am strongly opposed to the proposed Avangrid project to bring electrical cables into Dowses Beach! My support is with Susan Conley and the 'Save Greater Dowses Beach' efforts. Please note my complete opposition to this insanity! Regards, Peter Hansen

The General Court of the Commonwealth of Massachusetts

CAPE COD & ISLANDS LEGISLATIVE DELEGATION

State House, Boston 02133-1053

★ ★ ★

Senator Julian Cyr · Senator Susan Moran

Representative Sarah K. Peake · Representative Kip Diggs · Representative David T. Vieira

Representative Timothy R. Whelan · Representative Steven G. Xiarhos · Representative Dylan Fernandes

November 28, 2022

Mr. Alex Strysky, Environmental Analyst
Massachusetts Environmental Policy Act Office
100 Cambridge Street
Boston, MA 02114

Submitted via email

RE: New England Wind 2 Connector – Barnstable, Edgartown, Mashpee, and Nantucket (EEA No. 16611)

Dear Mr. Strysky,

Thank you for the opportunity to comment on the New England Wind 2 Connector filing with the Massachusetts Environmental Policy Act Office. As the state legislators representing the Cape Cod and Islands region, we write to express our strong support for both AVANGRID's third project, Commonwealth Wind, and its grid interconnection in Barnstable, New England Wind 2 Connector.

New England Wind 2 Connector shares many similarities to AVANGRID's first two projects (Vineyard Wind 1 Connector and New England Wind 1 Connector) which have been reviewed previously by the Commonwealth. These similarities include cables traversing a similar shared corridor below the seabed through state federal, Edgartown, Nantucket, and Barnstable waters, using the same installation methods, and making landfall and connecting to the electric grid in the Town of Barnstable.

The Commonwealth of Massachusetts has led the nation in the pursuit of offshore wind. AVANGRID's Commonwealth Wind project will continue this leadership by bringing more than 1,200 megawatts of renewable offshore wind energy to the New England electric grid and increasing the reliability and diversity of the New England energy supply. This renewably-sourced electricity will power over 750,000 homes in Massachusetts, reduce the region's reliance on natural gas and oil for electricity generation, and reduce year-round price volatility. The project will reduce greenhouse gas emissions by over 2.35 million US tons per year, the equivalent of taking over 460,000 internal combustion engine cars off the road. Further, the project is a critical component of meeting the Commonwealth's 2030 mandated carbon reduction benchmark under the 2021 Climate Roadmap Act.

At the local level, AVANGRID has successfully demonstrated experience performing the necessary due diligence in their environmental planning for landing the New England Wind Connector 2 within the Dowses Beach parking lot in Barnstable, MA. Construction work will be contained to only paved areas of the beach's public parking lot and causeway/driveway with no construction taking place within the public beach shoreline, in the dunes, in the marsh, or other environmentally sensitive ecosystems. The method of Horizontal Directional Drilling under the

beach to avoid impacts to valuable coastal resources is proven; the same method is currently being used during construction for the Vineyard Wind 1 Connector project just a few miles east of Dowses Beach.

AVANGRID has fostered a robust relationship with the town of Barnstable, having signed host community agreements with the town for the Vineyard Wind 1 and Park City Wind projects totaling millions of dollars of commitment. The Barnstable Town Council recently voted unanimously to begin negotiations on a similar agreement for Commonwealth Wind/NE Wind 2 Connector. The project further benefits our region through AVANGRID's partnership with Vineyard Power which includes a community benefits agreement with millions of dollars of investment to support Martha's Vineyard's community goal of achieving 100% of its electricity from renewable sources and elimination of fossil fuels.

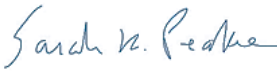
We urge your favorable review and approval of the New England Wind 2 Connector project.

Respectfully,

Julian Cyr
Assistant Majority Whip
State Senator
Cape & Islands

Susan L. Moran
State Senator
Plymouth and
Barnstable

Sarah K. Peake
Second Assistant Majority Leader
State Representative
4th Barnstable



Timothy R. Whelan
State Representative
1St Barnstable

Kip Diggs
State Representative
2nd Barnstable

David T. Vieira
State Representative
3rd Barnstable

Steven Xiarhos
State Representative
5th Barnstable

Dylan Fernandes
State Representative
Barnstable, Dukes, &
Nantucket

From: MEPA (EEA)
To: Strysky, Alexander (EEA)
Subject: Fw: New England Wind 2 connector
Date: Monday, November 28, 2022 2:26:33 PM

From: Tom McElligott <tom.mcelligott@gmail.com>
Sent: Sunday, November 27, 2022 9:37 AM
To: MEPA (EEA) <mepa@mass.gov>
Subject: New England Wind 2 connector

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

As Barnstable Residents, my wife and I would like to express our complete objection to the continuing Wind projects at Covell Beach, Craigville Beach, and Dowses Beach.

We live off of Craigville Beach road about a mile from the first project at Covell Beach and that road has been a complete mess since the project started. It is the major road to Covell Beach and surrounding areas for us and many residents in the area. It is now full of large bumps and holes in the road and has never been returned even close to the state when the project started well over a year ago. The road is an accident waiting to happen as people swerve through the bumps driving as quickly as possible as they often have no other road to use to get to their destination.

Why hasn't the wind company and the town of Barnstable been held responsible to repair the road? Just take one ride on it from the West Hyannisport Post office to Covell Beach and anyone would agree that the road is one you want to avoid because of all the new bumps due to the wind/sewage projects. And, the Covell Beach parking lot continues to be a mess with large construction equipment everywhere and only a small area available to residents for parking. Shame on the town leaders of Barnstable for continuing to allow this to happen and for continuing to support even more wind projects.

We feel that this project as well as the other two proposed projects will continue to ruin the beautiful beach environment in Barnstable for many years. Why didn't the other Cape towns approve this project? Perhaps we could learn a lot from these much better managed communities!

Thank you,
Tom and Terry McElligott
Barnstable residents

TOWN OF BARNSTABLE

OFFICE OF TOWN ATTORNEY

367 Main Street
Hyannis, Massachusetts 02601-3907
Phone 508-862-4620
FAX 508-862-4782

KAREN L. NOBER, Town Attorney
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charles.mclaughlin@town.barnstable.ma.us
kathleen.connolly@town.barnstable.ma.us

November 28, 2022

SENT VIA ELECTRONIC MAIL AND US PRIORITY MAIL
Alexander.strysky@mass.gov
mepa@mass.gov

Secretary Bethany A. Card
Executive Office of Energy and Environmental Affairs
Attn: MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

Subject: New England Wind 2 Connector
Environmental Notification Form (ENF) EEA #16611

Dear Secretary Card:

The Town of Barnstable offers the following comments:

I. Executive Summary:

The Town's comments below reflect several primary concerns.

First, the Town wishes to seek assurance that Commonwealth Wind cables cannot ever be accessed by a wind developer seeking to develop a wind farm in Nantucket Sound.

Second, Town officials are very cognizant of the fact that the Dowse's causeway is proposed as the only, and highly exposed, cable connection to the mainland. The proponent carries a very high burden to convince regulators that the culvert, the proposed concrete conduits atop the causeway, and the very causeway itself can successfully survive future storm events. It seems clear to the Town that the very size of the conduits will add considerable expenses for sewer and other utility installation, maintenance, and replacement along the proposed routes, and the Town should not bear those expenses during and after the project's useful life.

Third, the proposed substation and expansion of the existing Eversource substation pose significant risks to groundwater because of the presence of highly toxic dielectric fluids and other hydrocarbon-based liquids that, if released to our sole source aquifer perhaps only 50' or less below the substations, would cause irreparable harm to our public water supplies. All of these risks have been thoroughly addressed in the two Host Community Agreements between the Town and Vineyard Wind and between the Town and Park City Wind executed to date. A third HCA for this project has not been negotiated and, regardless, the aquifer protections agreed to in those agreements should, as a matter of course, be incorporated into any and all relevant permits as a matter of vital public policy. The standards are industry leading and should not be left out of permits in the hope that an HCA will be successfully executed.

Fourth, and certainly not the last concern, is that the proposed routes for upland cable will pass through several Zone I and Zone II Wellhead Protection areas. Again, groundwater protection is one of our highest priorities. The closest possible examination of these facts is required to fashion alternatives that offer the highest level of protection to our water resources.

The Town hopes that the Secretary's MEPA Certificate will indicate that the scoping tasks represent the minimum, and not the exclusive, areas to be examined by all involved agencies. The project is very large, the challenges many, and the resolutions complicated. As newly discovered issues arise or are identified, the Secretary should encourage all agencies not to be unduly restrictive in their inquiry and willingness to explore thoroughly all issues responsibly raised by the parties during permitting proceedings.

The Town's officials look forward to a proactive and creative exchange of ideas that will bring this important project to life if consistent sound environmental practice and public health, safety, and welfare considerations.

II. General comments related to specific ENF sections:

The ENF repeatedly refers to the project site focusing on the substation but the "project site" includes a beach landing, on shore cable routing, new substation and improvements to an existing substation. It is unclear whether Avangrid's answers of "yes" or "no" to ENF standard questions are for the substation or for the "entire project". The Town's comments and questions assume that the ENF is for the entire project.

The ENF suggests that the commencement date for the project will be 2025. In light of Avangrid's recent announcement seeking to re-negotiate Power Purchase Agreements while asserting that the project is uneconomic without new PPA's, is 2025 an accurate target commencement date in order to successfully coordinate the Town's sewer and utility installations with cable installation?

On page 8 of the ENF, the term "off season" is used. For clarity, does this term refer to the "summer season" or to the interim presence of rare and endangered species?

On page 9, Table 2, there is discussion of the Dowse's Beach access road. It has a trenchless crossing to address concerns about storm surge and impacts to sensitive resource areas. There appears to be little to no analysis of this highly vulnerable location to high velocity and storm surge events and how the proposed construction atop the causeway could negatively affect the area's resources.

On page 9, does the single core cable specification reflect of the modifications that needed to be made to the Phase 1 and 2 cables specifications relative to municipal, district, and private utilities regarding adequate lateral separation and insulation requirements?

On page 10, the new substation is proposed for an area in a residential zone and within an aquifer protection overlay district. The EIR must address the impacts of the proposed substation on these protected interests. An alternatives analysis should also be ordered.

On page 11, are the Oak Street substation and the new substation containment systems going to reflect the specificity of the Phase 1 and 2 containment design requirements as set forth in the relevant Host Community Agreements as a condition of permitting, rather than relying on the yet-to-be-negotiated HCA for this project?

On page 12, is the stormwater management plan for the existing and new electrical substations adequate, given the sensitivity of the surrounding public water resources?

On page 14, the proponent has answered "No" to the Outstanding Resource Water "ORW" question. Given the proximity of Zone I and II resources, and the proposed upland cable route alternatives, both of which pierce both Zone I and II areas, the answer to the ORW question should be "yes". All research and analyses implicated by the correct affirmative answer should be pursued to completion and publicly reported in a timely fashion.

With reference to page 15, Dowse's Beach and the upland cable routes are regulated areas. The ENF seems to downplay the impacts of the project at Dowse's and along the upland cable route. The EIR scope needs to set out adequate environmental precautions to protect all sensitive receptors along the cable route/s.

On page 16, the Centerville River and East Bay are covered under the River Sanctuary act. The ENF suggests that these two waterways are not considered a Wild and Scenic River or a State-designated Scenic River? How are these two water bodies designated and what will be required if either body is so designated?

On page 19, Section II.E is answered "No". In light of clear Conservation Commission jurisdiction over some of these areas, zoning designating areas as GP, WP, and Zone I and II, should not the answer be "Yes"? Additionally, the Three Bays Watershed is a "Nitrogen Sensitive Area" given great scrutiny by MassDEP as part of the Town's approved Comprehensive Wastewater Management Plan. Finally, MassDEP is expected to drastically revise its septic system regulations in January 2023, likely resulting in the Three Bays Area being designated as special areas necessitating greatly intensified protection from

nitrogen and other pollutants. If the answer is "yes", what additional studies are indicated and how will such designations affect the proposed project?

On page 20, "Economic Development", how does Avangrid's announcement that the proposed project is uneconomic affect the project's permitting trajectory and the amount of time that the Town should await final commitments before it may reasonably pursue other potential projects seeking landfall in Barnstable?

On page 21, the proponent has answered questions 1 A & B in the negative or "unknown" category. Given the admitted presence of piping plovers and least terns in the immediate area, the answer should be "yes". All appropriate studies, avoidance techniques, and mitigation solutions should be publically vetted by experts as part of the DEIR and EIR.

On page 26, D.3 should be answered "yes" with respect to the velocity zone. The cable will be elevated atop the culvert and causeway and therefore not technically "buried". Additionally, in terms of consistency, the Town published in 2009 the "Coastal Resource Management Plan" covering the Three Bays Area, including Dowse's Beach and East Bay. Among the subjects addressed was "Erosion Control" and "Design Criteria". See section 7.3.2 – 7.3.2.2, page 7 – 9. Design criteria favored design height of hard structures to "allow sediment release during extreme storm events" and "Require 'rough face' surfaces with shallowest possible slope to displace wave energy and cut down on 'end effect' erosion without a footprint that encroaches on resource areas." Finally, the Plan called for "Construct[ion] of hard structures as far landward from MHW (mean high water) as possible."

The addition of concrete conduits atop the causeway does not reflect the proponent's concerns about rising sea level at the Dowse's site. Nor does the ENF acknowledge the high degree of vulnerability of the causeway and the proposed conduit which is located in a high velocity flood zone and a Category 1 (the worst) Hurricane Zone with expected flooding to elevation 15', compounded by massive wave heights atop the elevated sea surface.

Clearly the ENF does not address the obvious risks posed, nor does it attempt to find and seriously analyze numerous other locations that might actually assure uninterrupted delivery of green energy to the grid. This deficiency must be rectified with exhaustive alternatives analysis.

On page 29, there does not appear to be sufficient analysis to confidently determine whether eel grass beds will be adversely affected by dredging nor is there sufficient disclosure of the presence of eel grass, the quantities, and its relative health. Only with this information can one determine whether the seaward cable exit point is appropriate or should be moved to another location.

III. Specific Categories:

1. Protection of Nantucket Sound:

The Town embarked on years of litigation to ban Cape Wind from building its 130 wind towers in Nantucket Sound in close proximity (one-quarter of a mile in one measurement) to the only deep-water channel between Vineyard Sound and Nantucket. This route exposed the Sound and

more than 400 miles of shoreline to the risk of a collision between fuel barges and the wind towers, an accident that would have released up to 1,000,000 gallons of petroleum products. Having in mind the devastation resulting from the Bouchard spill in Buzzards Bay which dumped "only" 100,000 gallons of fuel oil onto the beaches, the risk posed by the Cape Wind project was at least 10x greater.

Those risks were readily acknowledged by Vineyard Wind (VW)and by Park City Wind (PCW). The Host Community Agreements for both projects contain a ban on allowing their respective cable connections to the grid to be utilized by any developer who proposes to construct a wind farm in Nantucket Sound.

The public interests of the Nantucket Sound communities, the Commonwealth, and the parties have been well served by such a ban. That ban should be incorporated into any relevant permitting for this project as any failure to adopt that standard would be an outcome completely unacceptable to the Town.

2. **Cable Landing area:**
    a. An exhaustive study of alternative cable landing and mobilization areas is needed.
    b. For the Dowse's route, consider Horizontal Directional Drilling (HDD) landing and mobilization in vicinity of East Bay Road.
    c. For non-Dowse's routes, examine other locations including Centerville River, West Bay, etc.
    d. Consider splitting cable landings between PCW route and a westerly route.
    e. Consider joining CW and PCW routes.
    f. All landing and upland areas being considered are owned by the Town. Require a thorough examination of private property that would otherwise satisfy location criteria.

3. **Causeway and Culvert Considerations:**
    a. Causeway is in a high velocity "VE" flood plain zone. Expected flood elevation is at Elevation 15, per Flood Plain regulations. The Causeway is in a Category I (i.e., the worst) hurricane surge zone.
    b. An exhaustive study of the viability of both the causeway, the culvert, and the duct bank in Category 1, 2, and 3 hurricanes (or higher categories, if warranted) must be undertaken.
    c. Causeway, according to witnesses, is regularly submerged in lunar and storm conditions.
    d. DEP and/or CZM should identify "significant" erosion potential at the Dowse's site, especially in hurricane conditions.
    e. Construction atop a culvert poses a number of issues:
        a. Unclear what added weight of the conduit will do to integrity of culvert.

b. Unclear how normal maintenance, repair, and replacement of culvert would be accomplished if the conduit is built atop it, at what added costs, and at whose expense?
c. If the culvert fails under any circumstances, how would repairs/replacement be accomplished?
d. If the conduits on the causeway suffer a catastrophic failure under any circumstances, how would repairs/replacement be accomplished?
e. Will added water flow resistance be caused by the conduit atop the causeway? Would redirected water flow contribute to undermining the causeway and/or culvert, thereby causing washout and structural failure? Would existing height of water in either the abutting pond or in East Bay be altered temporarily or permanently in any circumstances and what would those effects be?
f. Require that the added bulk, weight, and resistance of conduit atop the causeway be fully modeled in a test tank to mimic hurricane conditions in order to predict erosion, culvert failure, or/or conduit failure.
g. Require at proponent's expense exhaustive peer review of all risks posed, and mitigation measures proposed, should the causeway be used for the proponent's cable.

4. **Dowse's Beach Mobilization:**
   - Time lines
   - Construction season
   - Public access and Handicapped pier access; proponent's verbal assurances of uninterrupted beach and pier access appear at variance with proponent's visual aids that suggest complete denial of such access during construction. This conflict needs clarity and resolution.
   - Surface restoration standards, interim and permanent

5. **Upland Conduit Routes:**
   a. Roadways south of Main Street are quite narrow and the 9' width of the conduits, with associated trenching design, will close many roads. How long will road access be closed? What are plans for alternate routing during such closures?
   b. For abutting residential and commercial properties, how will access be guaranteed?
   c. Conduit's complete occupancy of many roadways during construction will require relocation of all existing utilities in most roadways.
      1. How will this be accomplished?
      2. How will abutters be assured of uninterrupted use of their homes and businesses?
      3. Is compensation proposed for abutters whose use of their properties is interrupted? How will this be compensated and guaranteed?
      4. What other abutter impacts may be expected?

5. The conduit occupation of the roadways will make installation, repair, and replacement of utilities considerably more expensive. It will also add costs to sewer installation.
6. How will these costs be determined?
7. Will the proponent be held responsible for such costs for the life of the conduit installation?
8. How can the payment of such costs be guaranteed?
9. What thermal impacts may be expected in the immediate vicinity of the conduits? How will those impacts affect adjoining utilities in the narrow roadways? Order peer review of these impacts and costs at proponent's expense.
10. Will the proponent be responsible for added costs to protect , repair, or replace such utilities negatively affected by thermal impact and/or other identifiable causes related to the project?

6. <u>Road restoration:</u>

a. Vineyard Wind specifications for road restoration to Barnstable and MassDOT standards were apparently not included or inadequately identified in its road construction contract, leading to conflicts, delays, and enormous consumption of Town DPW staff time.
b. How can these standards be assured via CW permitting and contract drafting and approvals?
c. Will Avangrid agree to include such resolutions into its PCW road construction contracts or must there be supplemental proceedings initiated for the PCW permits?

7. <u>Coordinated Conduit and Sewer Construction</u>

a. Ideally, conduit and sewer construction should be accomplished by the same contractor in order to minimize conflicts and accelerate installation.
b. How can this be accomplished via a single contract or via two contracts with the same contractor, one public and one private?

8. <u>Environmental Considerations</u>

a. Both the primary and noticed alternative routes call for stream crossings. However, the ENF provides little to no detail concerning potential negative impacts to protected wetlands interests, nor does it propose and analyzed construction and mitigation methods intended to avoid or mitigate such negative impacts. See ENF, page 24. Please provide this analysis.
b. Older Town studies of eelgrass presence and health identified relatively vibrant communities of eelgrass, especially in Nantucket Sound in the immediate vicinity of Dowse's Beach and extending westerly from there. As potential partial mitigation offered by this developer, are these identified areas capable of sustaining eelgrass that might be replanted in the vicinity, even a demonstration project?

c. Electromagnetic and thermal impacts need to be thoroughly investigated. Regular testing pre-commissioning annually post-construction with reporting to the Town should be required.

9. **Proximity to and Protection of Public Water Supply**

- The ENF appears to incorrectly state that neither the primary nor noticed alternative upland cable route will pass near public water supply lands.
- In fact, the primary route will transect two (2) Zone I Wellhead Protection Areas as well as two (2) extended incursions into a very large Zone II Wellhead Protection Areas.
- The noticed alternative route will transect one Zone 1 and two Zone II areas.
- The projected upland routes will also pass very closely to potential Public Water Supply Areas under consideration for future well development.
- What research, if any, has the proponent conducted to identify risks and to propose mitigation measures to protect these Zones? Indeed, will any incursion into a Zone I be tolerated?

10. **Protection of the Sole Source Aquifer:**

a. Vineyard Wind and Park City Wind Host Community Agreements ("HCA") provided extensive protocols to identify all hazardous materials and fluids at their substations. The Town collaborated with these two developers in the design of industry-leading containment designs to protect groundwater from releases of dangerous fluids, including dielectric cooling fluids, diesel oil, etc. Indeed, Eversource, to its credit, has now voluntarily undertaken to retrofit its Independence Park sub-station with such protective designs and equipment.

b. Will the agencies require such designs and construction in both the proponent's and Eversource's Oak Street substation, regardless of an HCA between the proponent and the Town?

c. Construction sites often experience spills of diesel fuel, hydraulic fluid releases from broken hoses, etc. What conditions will attach to permits to require immediate response equipment on-site to contain releases in the shortest possible time? What training and stockpiled equipment will be available onsite to insure this instant response?

d. Given the extreme sensitivity of the sole source receptor, will there be a permitting condition requiring an onsite, independent Licensed Site Professionals (LSP) at proponent's cost, present at all times during construction to identify and direct response to identified environmental threats? Will the LSP have authority identified in any relevant permit to order the immediate shut down of the project for good cause?

e. The sole source aquifer on the Cape is often not more than 35 to 50 feet below the surface. Will permitting require testing to determine that depth both at Dowse's Beach, and along the entire upland route? Are there any site-specific design and construction precautions that may be needed to protect the aquifer?

f. The aquifer likely extends seaward from the beach. Given the number of access wells that need to be inserted along the path of the HDD, and given the depths at which the cable is proposed to be installed, will the jet-plowed cable, the HDD drilling, and/or the HDD enabled cable intrude into the aquifer?

g. If so, there appears to be a high likelihood for saltwater intrusion into the aquifer. A full study of the possibility and consequences of such an intrusion and of the effects of the cable contact with the aquifer needs to be undertaken.

h. If the study shows risks of damage to the aquifer, what options are available, including raising the elevation of the cable, to prevent such damage?

11. <u>Electrical Substations:</u>

a. The Town requests that an alternatives analysis be provided for the new substation. It is unclear whether that study has been performed. It is a significant asset meriting a logical selection process to determine the most appropriate location. It appears that more than twelve acres will be clear cut to accommodate the new substation. What alternatives analysis has been conducted?

b. Will the proponent follow the hazardous product identification, containment, and emergency notification protocols adopted for Vineyard Wind and Park City Wind?

c. Will these protocols be incorporated as conditions of any and all relevant permits issued for this project?

d. Will Eversource be required to update its substation with such containment and other protocols developed for Vineyard Wind and Park City Wind substations and for Eversource's Independence Park substation? If so, will the proponent bear the costs of doing so?

12. <u>Performance and Decommissioning Assurances:</u>

a. It is vital to identify the milestones and performance obligations of each stage of the project. How will that be accomplished? What will be the consequences for failing to comply with such obligations?

b. Adequate bonding is deemed by the Town vital to assure completion of the project once begun and removal and restoration of town property once the proposed project ceases operations.

    a. How will the appropriate insured amount of each be calculated in present value?
    b. How will the insured amount be increased over the life of the project to accurately reflect cost growth over time?
    c. How will recovery of such amounts be guaranteed?
    d. Will the bond issuer be U.S.–based and licensed to do business in the Commonwealth?
    e. Will bond terms and conditions be subject to review and reasonable commercial approval by the Town prior to commencement of construction?

13. **Economic Uncertainty:**
    a. Avangrid has asserted that its Park City and Commonwealth Wind projects are uneconomic in today's high interest rate and supply chain environment.
    b. What detailed, independent expert evaluation and conditions can be ordered to assure that the project, once begun, will be completed? Will the DPU/EFSB be directed to complete this investigation?
    c. Will appropriate irrevocable financial assurances be required before the construction commences? Would Avangrid be required to directly guarantee completion of this project, once begun?

14. **Process:**
    a. In the event that the parties reach agreement on a Host Community Agreement ("HCA") for this project, will the HCA be incorporated in whole or in relevant part to any permits that may issue for this project, including from the DPU and EFSB?

    b. Because the project is expected to be in commission for twenty-five years or more, requiring constant interaction between the proponent and the Town, will the DPU and/or EFSB order periodic compliance filings and hold open the opportunity for the parties to bring matters in dispute to either agency for resolution during and after the operational life of the project?

    c. The Town expects to require the advice of independent experts on a potential variety of subjects now and over the life of the project. Will the proponent be required to pay the cost of such expert consultants and, if so, under what terms and conditions?

Thank you for your consideration of these comments.

Sincerely,

Charles S. McLaughlin, Jr./mf

Charles S. McLaughlin, Jr.
Senior Counsel

VINEYARD POWER

OUR ISLAND • OUR ENERGY

November 28, 2022

Alex Strysky
Environmental Analyst – MEPA Office
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: New England Wind 2 Connector (EEA No. 16611)

Dear Mr. Strysky,

On behalf of Vineyard Power Cooperative, I would like to thank the Executive Office of Energy and Environmental Affairs (EEA) for the opportunity to provide comments in response to the New England Wind 2 Connector (EEA Number 16611).

The New England Wind 2 Connector project is another important transmission project for our Commonwealth and the region which is necessary to deliver approximately an additional 1,200 megawatts (MW) of clean electricity into our grid. Building on the successful relationships built with the local communities over the course of permitting and developing their first two projects (Vineyard Wind 1 Connector and New England Wind 1 Connector), Avangrid has demonstrated that project impacts due to construction will be minimized using carefully sited buried transmission, time-of-year restrictions for both marine and upland construction, coordination with municipal infrastructure construction, and proven traffic, erosion control and stormwater mitigation measures.

Once completed the project will result in an annual reduction of approximately 2.35 million tons of carbon dioxide equivalent (CO2e) emissions across New England, the equivalent of removing approximately 460,000 cars from the road each year. Projects at this scale are essential if local towns, the Commonwealth, and the Nation are to achieve ambitious goals laid out by local governing bodies, Governor Baker and our State Legislature and President Biden.

On behalf of our approximately 3,500 members, Vineyard Power Cooperative expresses our full support for all aspects of the New England Wind 2 Connector project. The project's benefits far outweigh the negative impacts we face if we continue to rely on fossil fuels.

Thank you for providing an opportunity to provide feedback on this project.

Sincerely,

Richard Andre
President – Vineyard Power Cooperative

P.O. Box 1077, West Tisbury, MA 02575
t. 508.693.3002; info@vineyardpower.com
www.vineyardpower.com

From: Wendy Cohen
To: Strysky, Alexander (EEA)
Subject: DOWSES BEACH MEPA ID #16611: New England Wind 2 Connector in Osterville MA
Date: Monday, November 28, 2022 8:03:21 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Alex,

I attended the meeting on November 16 at the Osterville Library. To say that I am outraged at the prospects of what Avangrid plans to do to this town and to Dowses Beach is an understatement.

My concerns are the following:

My family has owned and lived in Centerville for forty years. Dowses Beach is our most precious gem, a place of serenity, natural beauty and home to countless birds and animals, fish and sea life. Dowses Beach is a very large part of our family legacy and for this reason, I need to insure that you understand the depth and breadth of allowing Avangrid to destroy this pristine and fragile strip of land and sea.

Avangrid has an agenda… to make tens of millions of dollars for the benefit of its shareholders in its attempt to provide offshore wind power. Period.

The residents of Barnstable County have an agenda, to save and preserve this area for our children and grandchildren. Period.

Avangrid has a plan to plow through downtown Osterville. This little village has suffered through Covid and now this major company wants to set this town back again with years of construction.

They plan to rip up Dowses Beach, alter the wildlife sanctuary and cannot guarantee in any way the future of the sea life, birds, flora, animals. Their plan is to build wind turbines… but in fact, these structures will only function for 25 years.

Avangrid has failed to prove that the project is feasible. They do not take into account the impact of the environment, local businesses, and the ability of future generations to enjoy just as our parents have in the past.

Avangrid has been subject to numerous adversarial administrative actions for environmental issues. They cannot guarantee the sanctity of this project, that the beach and sea and all of its inhabitants will not be disturbed. That each and every business owner and homeowner in Osterville will be able to thrive during construction.

When I look at what has transpired at Covell Beach I am aghast at the amount of destruction that has taken place. And when I look at the narrow causeway at Dowses I can only shudder at what would happen if Avangrid has their way.

Avangrid has stated that Dowses is a perfect location because it has a paved road leading to the water. So this billion dollar company plans to destroy this precious land and beach because it is too cheap to pave a road at another location? There are a myriad of locations that could be paved for this purpose.

And if this wind farm is constructed, we now know that a huge portion of the energy will NOT service the Cape but will help Connecticut residents. How does this make sense??

Wendy Cohen
Centerville, MA

wgc5252@gmail.com

November 29, 2022

Alex Strysky, MEPA Analyst
Executive Office of Energy and Environmental Affairs
MEPA Office
100 Cambridge Street, Suite 900
Boston, Massachusetts 02114

Re: New England Wind Connector 2 Project / EEA Number 16611

Dear Mr. Strysky,

I am writing to submit comments on behalf of the Cape Cod Technology Council, Inc. ("CCTC") on the Environmental Notification Form ("ENF") submitted for the New England Wind Connector 2 Project, currently before the Massachusetts Environmental Policy Act Office. Founded in 1996, the CCTC is a membership based non-profit organization whose mission is to promote technology, education and economic development on Cape Cod, the Islands, and Southeastern Massachusetts. Our membership includes local Cape, Islands, and Southeastern Massachusetts businesses, technology innovators, educational organizations, government entities, working professionals, and community leaders.

The CCTC supports the development of innovative solutions to meet the anticipated energy needs of the Commonwealth of Massachusetts. One of the most promising of these solutions is wind energy. AVANGRID's New England Wind Connector 2 Project has the potential to meet these needs while advancing the state of wind energy technology.

AVANGRID's Commonwealth Wind offshore wind projects offer significant benefits, including:

- Generation of more than 1,200 megawatts of clean, renewable offshore wind energy supplied directly to New England's grid; and
- Providing electricity to approximately 700,000 homes across the state and reduction of greenhouse gas emissions by 2.35 million US tons per year, the equivalent of taking more than 460,000 cars off the road.

In light of the long-term economic and environmental benefits offered by off-shore wind projects such as New England Wind Connector 2 Project , the CCTC trusts that the EEA will carefully review and appropriately act on the ENF.

The CCTC appreciates your consideration of our views. Please contact us if you have any questions.

Respectfully,

Robbin Orbison

Robbin Orbison, *President*

Via E-Mail: *alexander.strysky@mass.gov*

Mass.gov | Executive Office of Energy & Environmental Affairs (EEA)

An official application of the Commonwealth of Massachusetts

Energy & Environmental Affairs (https://www.mass.gov/orgs/executive-office-of-energy-and-environmental-affairs)

Public Comments Portal

alexander.strysky@mass.gov

View Comment

Comment Details

EEA #/MEPA ID
16611

Comments Submit Date
11-29-2022

Certificate Action Date
11-29-2022

Reviewer
Alexander Strysky (857)408-6957, alexander.strysky@mass.gov

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Organization
--

Affiliation Description
Individual

Status
Opened

Comment Title or Subject

Topic: Avangrid's Commonwealth Wind/New England Wind 2 Connector

Comments

Segoe UI | 10 pt | Paragraph

Thank you for your presentation at the Osterville Village Library 11/16/22. After attending the meeting, I feel the entire wind project should be tabled. WIND IS NOT THE WAY...please review what's happening in California. The state issues emails to residents to refrain from using electricity (no charging their cars, using household appliances) from 6-10 pm...due to limited wind power. Please do not rush this project through...!

IF this wind project goes forth in MA, more effort should be put forth to locate this project in an already established wind farm area. Avangrid's Ken Kimmel explained Avangrid was "beat out" of other locations by other projects. A 1200 megawatt electric cable running through a public beach and running through our village and neighborhoods also concerns me as to health effects...this added to the already clearly stated negative impacts to an wildlife habitat. BILLIONS of dollars for a project that will last "maybe" 25 years. Please review what's occurred with the Block Island wind project, the wind projects in Europe.

Attachments

Update Status

Status

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CAPE COD
COMMISSION

Via Email

November 29, 2022
Bethany A. Card, Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs
Attn: MEPA Office, Alexander Strysky, MEPA Analyst
100 Cambridge Street, Suite 900, Boston, MA 02114

Re: Environmental Notification Form
EEA No. 16611 (Cape Cod Commission File No. 22029)
New England Wind 2 Connector, Barnstable

Dear Secretary Card:

Thank you for the opportunity to provide comment on the above-referenced ENF.

The New England Wind 2 Connector Project (the Project) requires an Environmental Impact Report (EIR) in some form and is therefore deemed a Development of Regional Impact (DRI) under § 12(i) of the Cape Cod Commission Act, c. 716 of the Acts of 1989. After MEPA review concludes, the Cape Cod Commission will conduct DRI review to assess the Project's consistency with the Cape Cod Regional Policy Plan (RPP) goals and objectives.

The Project consists of three High Voltage Alternating Current (HVAC) offshore export cables in a mapped Offshore Export Cable Corridor (OECC), onshore connection cables and transmission vaults at Dowses Beach in Barnstable, 6.7 miles of onshore transmission cable and ducts in existing roadway, a new substation off Oak Street in Barnstable, and an interconnection line from the substation to the existing higher voltage West Barnstable substation. When complete, the transmission cables will connect approximately 1200 Megawatts (MW) of renewable energy capacity to the ISO-NE electric grid, furthering Massachusetts' net-zero emissions goals.

The ENF indicates that various natural and built resources of Cape Cod are found in or near the Project work areas. Accordingly, Commission staff offer the following comments for the proponent to consider while preparing an EIR.

Offshore Transmission Cable Route

The offshore elements of the Project will generally utilize the same OECC as the Vineyard Wind 1 and New England Wind 1 Connector projects; however, a portion of the OECC associated with the New England Wind 2 Connector in Centerville Harbor was not previously reviewed as part of those projects. As noted in the ENF, using a substantially shared OECC should minimize environmental, operational, and commercial impacts. The proposed OECC appears to avoid and minimize impacts to sensitive ocean habitats, including North Atlantic Right Whale core habitat and eelgrass beds. The OECC also appears to minimize impacts to hard/complex bottom. Commission staff suggest the Proponent provide an assessment of potential impacts and mitigation measures for other species including fish, sea turtles, coastal waterbirds, sea ducks, and marine mammals in the EIR. The Proponent should also provide more details on the portion of the Project in Centerville Harbor that was not previously reviewed.

Landfall Site

The proposed landfall site at Dowses Beach is mapped rare species habitat for Piping Plover and Least Tern. The beach and surrounding nearshore environment are also mapped BioMap Core Habitat and Critical Natural Landscape. The Proponent should continue to consult with the Natural Heritage and Endangered Species Program while developing a protection plan to avoid and minimize adverse impacts to rare species and habitats. Horizontal directional drilling (HDD) at the landfall should prevent surface disruption of potential bird nesting areas. Construction should occur outside of bird nesting and foraging seasons to minimize adverse impacts on species that use habitat in the work area.

Dowses Beach also includes DEP-mapped wetlands; however, all work is proposed in existing paved areas or underground. The work area will be restored to pre-construction conditions upon completion. As proposed, the Project will not increase the amount of impervious surface at Dowses Beach. Construction best management practices including spill prevention measures, erosion controls, stockpile containment and management, and inspection and oversight are proposed in the ENF and should prevent adverse effects on wetland and water resources.

Project activities proposed within the floodplain include horizontal directional drilling at the landfall site and installation of underground transition vaults and the transmission cable duct bank system. Development within the floodplain is vulnerable to coastal storms and the effects of sea level rise. The Proponent should provide detailed information on how proposed methods and infrastructure are designed to address sea level rise and storms for the life of the Project. Staff notes portions of Dowses Beach Road and East Bay Road have been identified as highly vulnerable roads in the Cape Cod Commission's Low Lying Roads project. The Proponent should coordinate with the Town on any long-term planning for these road segments and proposed utility infrastructure underneath them.

Onshore Transmission Cable Route

The preferred and alternative land-based cable routes are located entirely within public roadway layouts or within the existing parking lot at Dowses Beach. Commission staff does not anticipate adverse impacts to natural resources from the proposed land installation routes presented, provided construction best management practices are followed. The ENF indicates an undetermined number of public shade trees may be impacted along the route. To the extent feasible, removal of public shade trees should be avoided, and any trees removed should be replaced.

According to the ENF, some of the underground easements associated with certain routes cross land currently protected under Article 97 of the Massachusetts Constitution for conservation purposes. Potential crossing locations include the existing parking lot and beach at the landfall site, along Dowses Beach Road, for onshore substation site access, and for the grid interconnection route. Commission staff suggest the Proponent investigate any alternatives to avoid adverse impacts on Article 97 lands. If unavoidable, and as noted in the ENF, the Proponent will be required to seek legislative approval, and should provide mitigation for any loss of protected open space lands.

The preferred route passes through Commission-mapped freshwater recharge areas, a Barnstable Wellhead Protection Overlay District, a Barnstable Groundwater Protection Overlay District, and is adjacent to potential public water supply areas. The transmission cable components of the Project will result in no net increase of impervious surface, consistent with RPP aquifer protection objectives. The proposed construction and erosion control measures should be sufficient to mitigate impacts to water resources along the transmission route.

The Project timeline is proposed to overlap with the Town of Barnstable's sewer installation plan, Phases 1 and 2. Commission staff recommend continued collaboration with the Town to ensure overlap of road construction to reduce construction related impacts to the community and resources. Construction period traffic management strategies for all modes of transportation should be detailed in subsequent submissions. Temporary traffic control plans should be prepared for the affected roadways, including intersections of major road crossings. Continued discussions with the Town of Barnstable and MassDOT are encouraged for further coordination on future roadway and infrastructure projects that may coincide with the Project.

Both the preferred and alternate routes for onshore cable pass through National Register historic districts, adjacent to inventoried historic structures, and into a portion of the Old Kings Highway Historic District. The high number of historic buildings along the preferred route raises concerns about potential impacts to both above ground resources and to archaeological resources in their proximity. Staff suggest the Proponent carefully examine the portions of the route adjacent to historic resources to ensure construction can occur without negative impact. The Proponent and their archaeology consultant should continue consulting with Massachusetts Historical Commission and Tribal Historic Preservation Officers to identify potential impacts to cultural resources and appropriate mitigation.

Onshore Substation

The proposed new substation in Barnstable is on an approximately 15.2-acre undeveloped wooded upland site, most of which would need to be cleared and graded. The parcel is within the Barnstable Aquifer Protection Overlay District and adjacent to protected open space. While the location is relatively close to the existing West Barnstable substation where the project proposes to interconnect, construction of the new substation will result in permanent loss of natural forest and increase impervious surface by 1.2 acres.

Staff suggest the Proponent continue to explore alternative locations for the new substation where there is existing disturbance or development. The EIR should provide more detailed substation design plans, including the low impact development stormwater techniques cited in the ENF, the capacity of those systems, necessary grading, and alternative designs and locations considered.

Thank you for the opportunity to provide comments on the above-referenced ENF. Commission staff are available to answer any questions you have about these comments.

Sincerely,

Kristy Senatori
Executive Director

Cc: Project File
via email-
Marc Bergeron, Epsilon Associates
Mark Ells, Barnstable Town Manager
Cape Cod Commission Barnstable Representative
Cape Cod Commission Chair
Cape Cod Commission Committee on Planning and Regulation Chair

November 29, 2022

Mr. Alex Strysky, Environmental Analyst
Massachusetts Environmental Policy Act Office
100 Cambridge Street
Boston, MA 02114

RE: New England Wind 2 Connector (EEA No. 16611)

Dear Mr. Strysky,

I write to offer my comments on the Commonwealth Wind application that is before the Massachusetts Environmental Policy Act Office (MEPA).

I am a long-term resident of Osterville where I shop and dine downtown and enjoy the beauty of Dowses Beach. I have followed the Commonwealth Wind project and am delighted that we are finally seeing our ocean create clean energy. The time has come for our community to accept that a relatively minor, off-season disruption of the area is a small price to pay for the very tangible long-term benefits that renewable energy has to offer. I have lived in many places where maintaining underground infrastructure is a part of daily life and is integral to an efficient and modern society. I believe that Avangrid will do the right thing and make sure that Dowses and the downtown will be in as good if not better condition once this cable is installed. There are many members of this community who believe as I do, and I hope that you will approve this permit.

Thank you for your time.

Very Truly Yours,
Claire O'Connor
Claire O'Connor
568 Bumps River Road
Osterville, MA 02655

Mass.gov | Executive Office of Energy & Environmental Affairs (EEA)

An official application of the Commonwealth of Massachusetts

Energy & Environmental Affairs (https://www.mass.gov/orgs/executive-office-of-energy-and-environmental-affairs)

Public Comments Portal

alexander.strysky@mass.gov

View Comment

Comment Details

EEA #/MEPA ID 16611	**First Name** Daphne	**Address Line 1** 85 Braggs Ln	**Organization** none
Comments Submit Date 11-29-2022	**Last Name** Northrop	**Address Line 2** --	**Affiliation Description** Individual
Certificate Action Date 11-29-2022	**Phone** --	**State** MASSACHUSETTS	**Status** Opened
Reviewer Alexander Strysky (857)408-6957, alexander.strysky@mass.gov	**Email** daphnenorthrop@gmail.com	**Zip Code** 02630	

Comment Title or Subject

Topic: Fails Simple Test

Comments

I am a resident of Barnstable and have spent countless hours at Dowses Beach over the past 40 years. When I first heard about the plan to bring utility cables onto this beach--of all beaches--I thought it must be a sick joke. This proposal fails the simple common sense test. Why pick THE most beautiful, unique, pristine, Cape gem for a large scale construction project that runs roughshod over a fragile natural environment? Residents would not be complaining if you'd just pick a logical, reasonable entry point for the cables.

Attachments

Update Status

Status

Opened

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dcr
Massachusetts

November 29, 2022

Secretary Bethany A. Card
Executive Office of Energy and Environmental Affairs
Attn: Alex Strysky, MEPA Office
100 Cambridge Street, Suite 900
Boston, Massachusetts 02114

Re: EEA#16611 – New England Wind 2 Connector (Barnstable) ENF

Dear Secretary Card:

The Department of Conservation and Recreation ("DCR" or "the Department") is pleased to submit the following comments in response to the Environmental Notification Form ("ENF") filed by Commonwealth Wind, LLC (the "Proponent") for the New England Wind 2 Connector (the "Project").

The Proponent proposes to install three new cables that will connect offshore turbines to the proposed landfall site at Dowses Beach. An approximate 6.7-mile underground duct bank will be constructed to connect from the landfall site to a proposed new substation site off Oak Street in Barnstable.

The proposed substation site abuts DCR's West Barnstable Fire Tower, and the Proponent proposes shared use of the fire tower access road. Fire towers play an important role in forest fire detection for municipalities across the Commonwealth. The Barnstable Fire Tower is staffed during the fire season, from March through October, and tower operators work to detect wildland fires in the Upper Cape region. The Barnstable Fire Tower is the 'Key' tower for the Cape and the Islands, meaning that the tower operators facilitate communications between regional fire towers and municipal fire departments. Early detection of fires and the ability to pinpoint their exact locations significantly reduces the response time for local firefighters.

DCR is concerned about potential impacts of the substation and use of the fire tower access road on the day-to-day operations of the fire tower, which is 68 feet tall. The fire tower staff requires 360 degrees of unobstructed views in order to carry out their operations related to fire prevention and safety. DCR also is concerned about whether substation operation may adversely affect radio communications from the fire tower. Finally, DCR staff must be able to access the fire tower at all times, including during the Project construction phase. DCR seeks to better understand and address these issues and asks that the Proponent to respond to these concerns.

The Proponent also should provide details as to the Proponent's rights to use the fire tower access road and, if such rights exist, that the Proponent provide a plan for use of the access road, both during and after construction. DCR notes that a Construction and Access Permit may be required for use of the fire tower access road.

Thank you for the opportunity to comment on the EENF. If you have any questions regarding these comments, or to request additional information or coordination with DCR, please contact DCR District Fire Warden Josh Nigro at josh.nigro@mass.gov.

Sincerely,

Douglas Rice

Douglas J. Rice
Commissioner

cc: Josh Nigro, Priscilla Geigis, Patrice Kish, Tom LaRosa

November 29, 2022

Mr. Alex Strysky, Environmental Analyst
Massachusetts Environmental Policy Act Office
100 Cambridge Street
Boston, MA 02114

RE: New England Wind 2 Connector (EEA No. 16611)

Dear Mr. Strysky,

Thank you in advance for taking the time to consider our comments on the Environmental Notification Form (ENF) for the New England Wind 2 Connector, currently before the Massachusetts Environmental Policy Act Office. As members of the MA State Committee of New England for Offshore Wind, we are eager for Massachusetts to advance a large-scale, responsible offshore wind industry. As a key part of the Commonwealth's strategy for achieving its mandated emissions reductions of 50% by 2030, we are eager to see the permitting process for the New England Wind project move forward in a timely and thorough manner.

This Connector application comes on the heels of two other Avangrid projects – Vineyard Wind 1 Connector and New England Wind 1 Connector – which have been approved by the state. This project builds on the first two projects: it will use the same installation methods, follow a similar shared corridor below the seabed, and connect to the grid in Barnstable.

These offshore wind projects are a key element to Massachusetts' overall strategy to meet its mandated climate goals and reach net zero by 2050. Offshore wind will be the linchpin of our decarbonization efforts in New England. The Massachusetts 2050 Decarbonization Roadmap found that New England would need a *minimum* of 30 gigawatts of offshore wind to power the economy by 2050.

Commonwealth Wind will provide more than 1,200 megawatts of local, renewable energy to the New England electricity grid. Alongside the other projects, it will also drive the creation of high-quality jobs, including for New England's unionized workforce, reduce pollution, and play a pivotal role in helping to stabilize energy prices and reducing energy costs for consumers by decreasing our region's overreliance on fossil fuels. Commonwealth Wind will provide electricity to approximately 700,000 homes across the state and will reduce our greenhouse gas emissions by 2.35 million US tons per year, the equivalent of taking more than 460,000 cars off the road.

Avangrid has demonstrated in its other projects and continues to demonstrate with New England Wind 2 Connector that it has performed due diligence with respect to environmental safety plans for landing cables under Dowses Beach in Barnstable. Construction work will be entirely limited to the paved areas of the beach's parking lot with the only permanent structures being two manhole covers. Beyond the parking lot, Avangrid will be laying cables under existing roads to the point of interconnection with the electric grid. Roads will be repaved afterwards, and any disruption from construction will be temporary. No construction will occur along the coastal beach or dunes, as a result of the company employing the horizontal directional drilling (HDD) methodology, which minimizes impacts to these coastal resources by burying the cable deep beneath the surface. The directional drill will start about a mile offshore and go 50 feet under the beach, which is accreting, not eroding. Work will be done outside of the Piping Plover nesting season, or if that becomes unavoidable, there will be careful monitoring to avoid disturbance to any birds nesting near the work. We also support offshore wind projects contributing to proactive wildlife monitoring and mitigation programs as a component of responsible development of this new industry.

Avangrid has the proven expertise and has demonstrated their desire to be a partner with the Town of Barnstable through its Host Community Agreements. We urge you to thoroughly and expeditiously review and approve New England Wind 2 Connector.

Respectfully,

Susannah Hatch
Environmental League of Massachusetts

Amber Hewett
National Wildlife Federation

Paul Niedzwiecki
Cape Cod Chamber of Commerce

Don Keeran
Association to Preserve Cape Cod

Rosemary Carey
350 Cape Cod

Patricia A. Gozemba
Salem Alliance for the Environment

Michael Hess
Iron Workers Local 7

Nicole DiPaolo
BlueGreen Alliance

Jim Mulloy
350 Mass

Amanda Barker
Green Energy Consumers Alliance

John Carlson
Ceres

Cynthia Luppi
Clean Water Action

Heidi Ricci
Mass Audubon

Susan Starkey
Faith Communities Environmental Network

Ben Howard
Bemis

Laura Gardner
Climate Reality Massachusetts Southcoast

Fran Schofield
Cape Cod Climate Change Collaborative

From:	Greg Gerdy
To:	Strysky, Alexander (EEA)
Cc:	Greg Gerdy
Subject:	Save Greater Dowses Beach & the medical uses of the American Horseshoe Crab - Limulus Amebocyte Lysate (LAL)
Date:	Tuesday, November 29, 2022 7:40:43 AM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Good morning Mr. Strysky,

We would like to express our complete agreement and support of the "Public Comment to the New England 2 Wind Connector ENF (EEA# 16611)" authored by Susanne H. Conley.

Additionally, we wish to add that the important medical value of the American horseshoe crab must not be overlooked.

On pp. 3-4, the Public Comment states that:

> Osterville's very name is derived from the oysters common to local waters. As is well-documented, a healthy shellfish population is essential to the removal of nitrogen in a marine environment. Another very vulnerable population, as described by the International
>
> 3
>
> Union for the Conservation of Nature, is the American Horseshoe Crab. Dowses beach is an important spawning and molting area for these animals, whose decline is partially attributed to coastal zone development. The young, which molt multiple times throughout the year, do so in great numbers at Dowses beach; the adults do as well twice a year. At times, their discarded shells number in the hundreds from one end of the strand to the other.

We attach a brief summary of the American horseshoe crab's medical uses below. (Source: Maryland.gov)

Finally, we wish to emphasize that more than ever, not only is there a need to proactively preserve Dowses Beach for all the great reasons Ms. Conley aptly described in the Public Comment to MEPA,
but there is also a true MEDICAL need to protect the environmental "spawning and molting area" of the endangered American horseshoe crab that can be found in Dowses Beach.

Saving Dowses Beach is saving humanity.

Thank you.
Maria Gerdy and family

Medical Uses

The blood of the horseshoe crab provides a valuable medical product critical to maintaining the safety of many drugs and devices used in medical care. A protein in the blood called Limulus Amebocyte Lysate (LAL) is used by pharmaceutical and medical device manufacturers to test their products for the presence of endotoxins, bacterial substances that can cause fevers and even be fatal to humans.

The LAL test is one of the most important medical products
derived from a marine organism to benefit humans.

Why is the Horseshoe Crab the original "blue blood"?

A horseshoe crab's blood has a blue to blue-green color when exposed to the air. The blood is blue because it contains a copper-based respiratory pigment called hemocyanin.

From: MEPA (EEA)
To: Strysky, Alexander (EEA)
Subject: Fw: New England Wind 2 Connector --Dowses Beach- comments
Date: Tuesday, November 29, 2022 8:27:06 AM

From: Marie Taylor <mariectaylor@aol.com>
Sent: Monday, November 28, 2022 6:14 PM
To: MEPA (EEA) <mepa@mass.gov>
Subject: New England Wind 2 Connector --Dowses Beach- comments

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

I am a resident of Osterville, MA am urging your agency to deny access to the company looking to use Dowses Beach as a landing for its wind energy business. Destroying the many ecosystems in and around the landing area is indeed a black eye and a blind for a wind energy initiative. Our planet and its natural environment is what we are trying to save and sacrificing Dowses's natural environment --home to sea birds, turtles, wildlife and beautiful, seaside vegetation is not the way to proceed. If this wind energy business were truly concerned about the environment, they would not even be considering the Dowses area.

And, in this age of drug addiction, an area where human beings can seek peace and beauty and quiet enjoyment and maybe even hope should not be needlessly taken away. There are other avenues/alternatives for this wind company. They just need to dig deeper into their pockets, which spread over 25 years, probably isn't even that much.

Please deny this wind company's requests for Dowses Beach thereby giving the company the opportunity to do the right thing.

Marie C Taylor
65 Seth Goodspeeds Way
Osterville, MA 02655

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Energy & Environmental Affairs (https://www.mass.gov/orgs/executive-office-of-energy-and-environmental-affairs)
Public Comments Portal

alexander.strysky@mass.gov

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Comment Details

EEA #/MEPA ID	First Name	Address Line 1	Organization
16611	John	P.O. 520	OVA/OBPA
Comments Submit Date	**Last Name**	**Address Line 2**	**Affiliation Description**
11-29-2022	Crow	--	Individual
Certificate Action Date	**Phone**	**State**	**Status**
11-29-2022	--	MASSACHUSETTS	Opened
Reviewer	**Email**	**Zip Code**	
Alexander Strysky (857)408-6957, alexander.strysky@mass.gov	looney75@comcast.net	02655	

Comment Title or Subject

Topic: OVA/OBPA Comments New England Wind 2 Connector ENF

Comments

Please read the full comments from the Osterville Village Association/Osterville Business and Professional Association that are attached.

The comments ask MEPA to:

1.Dismiss the ENF or suspend this review until Avangrid has renegotiated the contracts it says is required for the Commonwealth Wind Project to be viable.

2. Take the year delay Avangrid announced it needs, plus the time Avangrid told investors power contract renegotiations would take to assess and further the environmentally sensitive way for the Commonwealth to develop offshore wind.

3.Dismiss the Avangrid ENF without prejudice for its omission of material information and request a refiling when appropriate with complete and supportable recitation of full facts to enable MEPA to decision-make on an accurate record.

Thank you for reading the full comments sent with this limited summary of the action we request of MEPA.

Attachments

Osterville ENF comments Nov 29 2022 .pdf(null)

Update Status

Status: Opened

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November 29, 2022

Secretary Bethany A. Card
Executive Office of Energy and Environmental Affairs
Attn: MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

Subject: OVA/OBPA Comments
New England Wind 2 Connector ENF

Dear Secretary Card:

On September 30, 2022, Commonwealth Wind, LLC, which is a subsidiary of Avangrid Renewables, LLC, ("Avangrid"), which is a subsidiary of Avangrid, Inc, which is a subsidiary of Iberdrola S.A., submitted an Environmental Notification Form (ENF) for the New England Wind 2 Connector (the "Project").

Commonwealth Wind is the third project Avangrid proposes to land at public beaches in, and run through the streets of, Barnstable. This is commonly referred to as the environmentally aggressive "Spaghetti Approach" to offshore wind development, in contrast to environmentally sensible, planned development.

If and when Avangrid executes the changes on many fronts its parent, Iberdrola, says it needs, including power contract renegotiations, because Commonwealth Wind is not economically viable, Avangrid proposes to 1) land the Project at Dowses Beach in Osterville, Massachusetts;[1] and 2) depart from its prior decision to avoid a business district and route its infrastructure through Osterville's dense Business District, community center and year-round residential areas.

We are writing to you today as President and Vice President of the Osterville Village Association ("OVA") and Chairman of the Osterville Business and Professional Association ("OBPA"). The OVA is a non-profit, non-partisan, volunteer civic association that helps year-round and seasonal residents work together in the best interest of the village. The OVA has an 81-year history of civic involvement and has many hundreds of members, making it one of the largest in the State of Massachusetts. The OBPA is a permanent standing subcommittee of the OVA representing the interests of Osterville business owners and professionals.

This comment asks MEPA to:

- Dismiss the ENF or suspend this review until Avangrid has renegotiated the contracts it says is required for the Commonwealth Wind Project to be viable

[1] https://img1.wsimg.com/blobby/go/dd4fb773-a547-44d5-8b5f-115be9beea71/downloads/AVANGRID%202022%20Long-Term%20Outlook%20Update%20%26%20Works.pdf?ver=1664913826222 page 25.

- Take the year delay Avangrid announced it needs, plus the time Avangrid told investors power contract renegotiations would take to assess and further the environmentally sensitive way for the Commonwealth to develop offshore wind
- Dismiss the Avangrid ENF without prejudice for its omission of material information and request a refiling when appropriate with complete and supportable recitation of full facts to enable MEPA to decision-make on an accurate record

I. Avangrid Has Represented to The Investment Community That Both Connecticut's Park City Wind and Massachusetts's Commonwealth Wind Power Purchase Agreements Must Be Renegotiated in Order For Commonwealth Wind To Be Viable; MEPA Should Dismiss Or Alternatively Suspend The ENF Review Until Such Time Avangrid Has Renegotiated Power Contracts

This should be a simple decision for your office.

On September 22, 2022, Avangrid's ultimate owner, Iberdrola, announced that it requires a one-year delay in the Project. Avangrid further explained to the investment community that the Commonwealth Wind project "numbers do not work."[2] Avangrid has repeatedly stated to the investment community that Commonwealth Wind is not viable, and that the company requires multiple power contract renegotiations to achieve economic viability.

Specifically, Avangrid explained that it:

- Seeks new investor partners for the Project and for Park City Wind, a key strategic initiative (Transcript, Long-Term Outlook Update, September 22, 2022, page 21)
- Does not have enough resources to do "everything it has on the table" (Transcript, Long-Term Outlook Update, September 22, 2022, page 25)
- Needs to renegotiate power purchase agreements with Massachusetts **and** Connecticut authorities (Transcript, Long-Term Outlook Update, September 22, 2022, page 19)
- Is exploring new turbines to improve the projects' business case (Transcript, Long-Term Outlook Update, September 22, 2022, page 28)

Iberdrola "thinks" it "should be able to put it on the right track" (Transcript, Long-Term Outlook Update, September 22, 2022, page 25). This is, presumably, after this moment in time that is, in the company's judgment, "not the right time to contract for certain things" (Transcript, Long-Term Outlook Update, September 22, 2022, page 25).

On October 26, 2022, multiple investor analysts pressed Iberdola for clarity about whether it required renegotiated power contracts to proceed with the Project.[3] Iberdrola was unequivocal in its answer:

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[2] https://img1.wsimg.com/blobby/go/dd4fb773-a547-44d5-8b5f-115be9beea71/downloads/AVANGRID%202022%20Long-Term%20Outlook%20Update%20%26%20Works.pdf?ver=1664913826222 page 25.

[3] https://seekingalpha.com/article/4549524-avangrid-inc-agr-q3-2022-earnings-call-Transcript

"Pedro Azagra
The answer is we need to -- those revisions in order to continue with the project. We just need that.
Julien Dumoulin-Smith
Yes. You need them to move forward, right? I'm hearing you, right.
Pedro Azagra
Yes. No doubt."[4]

Avangrid further told the investment community that its required renegotiation process will take about nine months.[5]

Power contract adequacy is central to Avangrid's ENF. The ENF at page 37 notes that Avangrid has "secured multiple Power Purchase Agreements (PPAs) totaling 1,200 MW of power to the ISO-NE electric grid under agreements with Massachusetts entities in accordance with the states' respective renewable energy requirements." The ENF explanation of Project Need and Benefits in Appendix A leads with a description of the power contracts. The ENF predates Avangrid's declaration that the power contracts to which it had agreed are no longer adequate to support the Project. A PPA that the company has announced unequivocally requires renegotiated pricing in order to move forward is not an operative PPA.

Request: MEPA should dismiss the ENF without prejudice until Avangrid has concluded the power contract renegotiations in Massachusetts and Connecticut Avangrid has stated it needs to make Commonwealth Wind and Park City Wind viable - "a full negotiation", according to company leaders.[6] In the alternative, MEPA should suspend the ENF until such time Avangrid completes the renegotiations it says are required for Commonwealth Wind to move forward.

MEPA should not countenance the variable messages Avangrid rolls out depending on its audience and need of the moment.

Avangrid is either straightforward 1) to investors when it confirms that its current contracts are not financially viable and must be renegotiated ***or*** 2) to Massachusetts agencies when it says it will move forward with Commonwealth Wind and that MEPA should expend taxpayer-funded employee time and public resources in reviewing the Project. The company is being straight with one or the other - not both. Is this the company MEPA wishes to trust to be straight with it about environmental implications, mitigation and management? Reading its ENF suggests the answer is MEPA should not.

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[4] https://img1.wsimg.com/blobby/go/dd4fb773-a547-44d5-8b5f-115be9beea71/downloads/Avangrid%20Investors%20Highlights%20Oct%2026%202022%20.pdf?ver=1668965992347 Page 12.
[5] https://img1.wsimg.com/blobby/go/dd4fb773-a547-44d5-8b5f-115be9beea71/downloads/Avangrid%20Investors%20Highlights%20Oct%2026%202022%20.pdf?ver=1668965992347 Page 10.
[6] https://img1.wsimg.com/blobby/go/dd4fb773-a547-44d5-8b5f-115be9beea71/downloads/AVANGRID%202022%20Long-Term%20Outlook%20Update%20%26%20Works.pdf?ver=1664913826222) page 31.

In Barnstable, Avangrid has explained to the public its desire to move ahead with environmentally disruptive *onshore part* of the Project despite telling investors that the Project *as a whole* is not economically viable. Avangrid said " …we have not delayed the construction schedule for onshore work, and meeting that schedule is vital for the project…" (email from Avangrid employee to OVA Board dated October 14, 2022), as if the on-shore component would move forward irrespective of the off-shore component. The Massachusetts Department of Public Utilities was the adult in the room in response to Avangrid's request to suspend review of the power contracts to which Avangrid recently agreed. MEPA needs to be the adult in the room to stop environmental disruption for a Project state electricity consumers would fund through a power purchase agreement with numbers that Avangrid says "do not work."

MEPA should require Avangrid to refile its ENF after it has executed the changes Avangrid says it needs for Commonwealth Wind to be viable - new investors, new power contracts, "a full negotiation." To do otherwise wastes taxpayers' funds that support MEPA staff time and wastes the communities' time and resources.

As reported in the *Providence Journal* on November 15th, 2022, Rhode Island is considering the suspension of another wind farm developer's application for transmission cable permits for the same reason - a lack of financial viability of its proposed project. The Rhode Island state agency recognized the fact that a lack of financial viability was a significant concern. The siting board chairman, Ronald Gerwatowski, stated, *"It is not reasonable and fair to those governmental agencies, including the EFSB, to spend time and resources evaluating an application for a project which may be hypothetical in nature due to an admission by the Applicant that the proposed project is not going to be financially viable."* [7] This is precisely the same as that faced by Massachusetts with respect to Avangrid and its non-viable Park City Wind and Commonwealth Wind projects.

II. MEPA Should Require a Full Assessment of Alternatives, Including the Lowest Environmental Impact Means To Connect Off-Shore Wind Facilities

Avangrid's proposed transmission pathway approach is commonly referred to as the environmentally aggressive "Spaghetti Approach" strewn across Cape Cod. It is apparently the most profitable development approach for Avangrid shareholders. It is not the right pathway for the environmental impact on the seabed and the shoreline. Nor is it the right pathway for Massachusetts consumers footing the bill.

The alternative analysis in the ENF is thin, inconsequential, and not meaningfully helpful to decision-makers. Avangrid should provide MEPA analysis about means to reduce the number of offshore platforms, cabling, seabed disturbance, and cables landing at the Massachusetts coast to reduce impacts on existing ocean uses and marine and coastal environments to the greatest practical extent.

[7] "Questions raised over offshore wind cable" by Alex Kuffner; November, 15, 2022, Providence Journal USA Today Network

If Avangrid is unwilling or unable, others should be afforded time to supplement the MEPA record accordingly. MEPA has ample time to pursue such analysis through an ENF suspension given Avangrid's need for a year and an unworkable power contract that is an underpinning of its filing.

Request: MEPA should require Avangrid to provide comparative analysis of alternatives that optimize off-shore and on-shore transmission necessary to integrate off-shore wind in a way that mitigates environmental impacts, and reduces overall consumers costs for generation, off-shore wind transmission, and onshore upgrades.[8] Requiring analysis to enable MEPA and others to assess means to mitigate environmental impacts of off-shore wind integration should be an easy call for MEPA, made even easier by Avangrid's conclusion that Commonwealth Wind is not economically viable, requires a year's delay and contract renegotiations to shift costs from Avangrid shareholders to Massachusetts consumers.

III. Avangrid's ENF Filing Is Replete with Material Omissions; MEPA Should Reject It, Or Independently Establish the Veracity Of Representations Of All Asserted Facts, Representations and Characterizations

Avangrid's ENF omits material information on a range of issues. The omissions are so material they amount to misleading information and cast a shadow over *all* ENF representations. A few examples illustrate the point.

- **Avangrid's ENF Omits its own 2020 *Less Preferable* Categorization of Dowses Beach**. In 2020, Avangrid categorized Dowses Beach as *Less Preferable* in relation to ***many*** other landing spots. This representation was in an Avangrid filing with the Energy Facility Siting Board in 2020.[9] That fact does not appear in its 2022 ENF filing.

  Today, in local public forums, Avangrid repeatedly explains Dowses Beach *Less Preferable* categorization by stating it meant that in relation to the landing spots of its two other projects in Barnstable. This is not true. Avangrid's 2022 verbal explanation in local public forums when questioned about the *Less Preferable* categorization status does not align with Avangrid's own 2020 written assessment. Avangrid changes its story depending on its need and audience of the moment (as it does about the power contract and its ability to move forward). Avangrid's approach in this respect casts a pall over all of its ENF representations.

  In its 2020 Energy Facility Siting Board filing, Avangrid also did not include Dowses Beach in its "*Promising*" landing list. Avangrid categorized twelve *other* landing sites within, and outside of, Barnstable, as "*Promising*." Back in 2020, to the Energy Facility

[8] https://img1.wsimg.com/blobby/go/dd4fb773-a547-44d5-8b5f-115be9beea71/downloads/Transmission-Options-for-Offshore-Wind-Generat.pdf?ver=1668965992842; https://img1.wsimg.com/blobby/go/dd4fb773-a547-44d5-8b5f-115be9beea71/20360_offshore_wind_transmission_-_an_analysis.pdf

[9] https://img1.wsimg.com/blobby/go/dd4fb773-a547-44d5-8b5f-115be9beea71/downloads/Avangrid%20Analysis%20Volume%20I%20Dowses%20Not%20Preferab.pdf?ver=1664913826820 page 4-9.

Siting Board, Avangrid explained that Dowses Beach was not *"Promising"* "...due to potential impacts to environmental resources or poor egress (i.e., potentially inadequate road width, or routing through densely developed business districts or year-around residential areas)."[10] In 2020, Avangrid noted Dowses Beach has "less favorable egress" and "may require a bridge crossing."

What Avangrid said makes Dowses Beach a problem - poor egress and routing through densely developed business and year-round residential areas – was a matter of fact in 2020 and remains so in 2022.

The only thing that has changed since 2020 is Avangrid's advocacy. In its 2022 ENF, Avangrid has gone so far to recast the environmentally fragile egress to the parking lot at Dowses Beach as to make up a name for the delicate passage. According to the ENF, the fragile causeway is now an "onshore transmission route along Dowses Beach Road."[11] There is no such road. Avangrid's fabrication that the environmentally fragile causeway between East Bay and Phinney's Bay is a road and naming it underscores that the ENF puts advocacy over facts.

- **Avangrid's ENF Omits that its Shareholders' Preferred Route is the Village Business District, Community Center, and Dense Year-Round Residential Area.** In its ENF, Avangrid chose to leave out relevant and significant information about the company's preference to route its Project through Osterville's Main Street, its dense Business District and community center with dense housing.

  In the ENF, Avangrid characterizes the difference between the two routes by saying that there are "more businesses" in its preferred route – straight through the Business District - than its alternative route. While Avangrid's characterization is true – busy and dense business centers have more businesses than non-business districts – Avangrid's comparison of the two routes so omits facts as to materially mislead MEPA.

  While it is generally unconstructive to assign motives, in this case the way Avangrid described the difference - more businesses in one than the other – can only be a deliberate intent to minimize the profound difference in routes and consequent impacts on public health, safety, traffic and serious adverse local economic impacts.

  The Business District is the center of Osterville's organized and informal village activities on a year-round basis. The village center is active all year long. The businesses and restaurants depend on patrons all year long, and the local community requires those businesses to remain viable.

  In Avangrid's 2020 filing with the Energy Facility Siting Board, the company

[10] https://img1.wsimg.com/blobby/go/dd4fb773-a547-44d5-8b5f-115be9beea71/downloads/Avangrid%20Analysis%20Volume%20I%20Dowses%20Not%20Preferab.pdf?ver=1664913826820

[11] ENF page 2.

led its explanation of why it rejected landing at Kalmus Beach in Hyannis with concerns about business district impact: "First, an onshore route would have passed directly through downtown Hyannis, affecting many businesses in a high-traffic area."[12] In 2022, Avangrid now *prefers* to adversely affect many businesses in a high-traffic area.

In addition to stores and restaurants, the Business District route includes Osterville's only fire station, only public library (which holds itself out as a charging station for the community in power outages), only post office, only barber, only banks, only gas stations, only community playing fields, five religious facilities, and more. The potential for traffic congestion is exceptionally high.

The Business District route also has community health and safety implications. The only fire station in the village with ambulance service is on the Main Street Avangrid shareholders prefers to disrupt. It is the primary and quickest route for ambulances to go from Osterville to Cape Cod Hospital in Hyannis. Osterville's public water supply, and a Watershed Protection District, is located on Avangrid's preferred route as well.

At every level, Avangrid's preferred route is the route to avoid.

Avangrid is aware of the Osterville Business and Professional Association's ("OBPA") express opposition to Avangrid landing power infrastructure at Dowses Beach, and opposition to running it through the Business District. Osterville businesses are emerging from the adverse economic impact of the pandemic and cannot withstand the optional business disruption Avangrid wishes to impose on them over the coming years.

Avangrid is also aware of the community sentiment expressed in standing room only meetings of the Osterville Village Association (OVA) and revealed in an OVA survey that showed Osterville residents opposed the landing at Dowses Beach (10:1). [13] The overwhelming majority of respondents who said if it did land at Dowses Beach, it should not be routed through the Business District.

Avangrid's ENF filing identifying it prefers to disrupt Osterville's Business District reflects its lack of concern about the local community, local business devastation, traffic impacts, access to services, and health and safety impacts. The way the ENF mutes the impact by saying only that the route has more businesses than the non-business route is materially misleading to MEPA and appalling to locals.

- **Avangrid blurs information about Project benefits to the affected community with distant geographic areas.** As just one example, on page 19 of the ENF, Avangrid notes the Town of Barnstable's Comprehensive Plan includes the Town's goals to promote sustainable development and infrastructure and encourage the growth of new economic

[12] https://img1.wsimg.com/blobby/go/dd4fb773-a547-44d5-8b5f-115be9beea71/downloads/Avangrid%20Analysis%20Volume%20I%20Dowses%20Not%20Preferab.pdf?ver=1668965992655 page 4-8.
[13] https://img1.wsimg.com/blobby/go/dd4fb773-a547-44d5-8b5f-115be9beea71/downloads/Survey%20Result%20.pdf?ver=1668965992422

sectors, such as marine and environmental technology and renewable energy that would increase employment opportunities. The ENF asserts that the Project supports economic development goals. In fact, the Project sends its jobs and economic development benefits to distant communities. On its Commonwealth Wind web site (https://www.commonwealthwind.com), Avangrid touts job creation and economic development implications off-Cape, around Brayton Point, Salem Harbor, and New Bedford. According to Avangrid's websites and public relations materials, Osterville, Barnstable, and Cape Cod are **not** among the communities to whom jobs and growth of new economic sector benefits will flow.

- **Avangrid's ENF omits that its Project will block access to the ADA Accessible Fishing Pier at Dowses Beach.** It is generally understood that Avangrid's desire to block access to the ADA Accessible Fishing Pier at Dowses Beach that services seniors and handicapped residents on a year-round basis will be challenged through local, state, and federal venues. That Avangrid's ENF fails to even mention its plan to block ADA-friendly pier is yet another example of a materially important omission.

  Request: To assure MEPA makes its decisions based on wholly accurate facts, MEPA should reject the ENF filing, or alternatively, independently verify every representation in it. MEPA should also require Avangrid to provide alternative analysis of all other potential landing spots listed in its 2020 EFSB filing.

  MEPA should take administrative notice of Avangrid's Commonwealth Wind and Park City Wind websites and the information Avangrid provides to the public about growth of new economic sectors and jobs. Those websites, written by Avangrid, affirm that here again, Avangrid adapts its representations based on its current audience and advocacy needs.

  MEPA should 1) disregard Avangrid's claims in the ENF about the growth of new economic sectors that would increase employment opportunities in furtherance of Barnstable's Comprehensive Plan, 2) direct Avangrid to a) provide data to support any economic development or jobs claims about growth of new economic sectors or jobs in Barnstable and b) reconcile it's ENF claims with its representations on its websites.

Conclusion

As the public relied on the Department of Public Utilities to do the right thing in the face of Avangrid's effort to shift costs it agreed to assume over to consumers, so too does the public rely on MEPA to do the right thing to protect our environment and to base decisions on well vetted fact, not on the morphing advocacy that is the ENF.

Please dismiss or suspend the ENF for the reasons described above. If MEPA proceeds to invest publicly funded resources to assess the ENF of this unviable Project, MEPA should independently verify each factual representation given its material omissions.

Thank you for considering these views.

Regards,

John Crow, President
Osterville Village Association

Peter Hansen, Vice President
Osterville Village Association

Gail Nightingale, Chairman
Osterville Business and Professional Association

Mass.gov | Executive Office of Energy & Environmental Affairs (EEA)

An official application of the Commonwealth of Massachusetts

Energy & Environmental Affairs (https://www.mass.gov/orgs/executive-office-of-energy-and-environmental-affairs)

Public Comments Portal

alexander.strysky@mass.gov

View Comment

Comment Details

EEA #/MEPA ID	First Name	Address Line 1	Organization
16611	Margaret	1692 South County Road	--
Comments Submit Date	**Last Name**	**Address Line 2**	**Affiliation Description**
11-29-2022	Rowland	--	Individual
Certificate Action Date	**Phone**	**State**	**Status**
11-29-2022	--	MASSACHUSETTS	Opened
Reviewer	**Email**	**Zip Code**	
Alexander Strysky (857)408-6957, alexander.strysky@mass.gov	margaretrowland@comcast.net	02655	

Comment Title or Subject

Topic: Questions regarding Cable infrastructure for the long term

Comments

Segoe UI | 10 pt | Paragraph

Dear MEPA,

Thank you for your recent presentation at the Osterville Library. Following the presentation, I submitted several questions to Avengrid Renewables, and am still awaiting answers from them.

I would like to know what the long term plan is for the cables running under Nantucket Sound, and the proposed roadways once the project is done in 25 years. Will the cables be able to be re-purposed to another future wind farm? Is this lease renewable to Avengrid after 25 years? Would a future new wind farm in this same location be able to reuse the Avengrid cables? Would the cables be abandoned under roads for all time? I can not see the Town of Barnstable opening up the roadways to remove them. Would this prohibit any potential future use of space under the roads?

Please consider all of these questions as the plan evolves. We need to think long term in regards to this infrastructure. I have been informed that Avengrid will be getting back to me with the answers to these questions, and I look forward to learning more about the proposed plans.

Thank you,

Peggy Rowland

Attachments

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Status

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BACK TO SEARCH RESULTS

From: Anastasia Guenther
To: Strysky, Alexander (EEA)
Subject: Revised and final comments - New England Wind 2 Connector ENF EEA #1661 (Proposed Commonwealth Wind/Dowses Beach Cable Landing)
Date: Tuesday, November 29, 2022 1:53:29 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Please replace my earlier "Comments" email with this one. Thank you.

Dear Alex,

I write as a resident of the village of Osterville, one of the seven villages in Barnstable, and a frequent visitor to Dowses Beach and the surrounding area. For so many reasons I am opposed to the landing of electrical export cables at this beach and its surrounding area, but first and foremost it is because of the environment. I am a supporter of wind and other forms of renewable energy, but I cannot in good faith support Avangrid and their plans. The unique environment at Dowses Beach is an unsuitable landing spot. I'll include some of these reasons below.

A Treasured, Year Round Refuge

The Greater Dowses beach area ("Dowses") is a complex, environmentally sensitive estuarine environment including many things: a barrier spit fronting Nantucket Sound, a sandy beach, a long dune system, a large bay with a mooring ground, a smaller brackish bay, wetlands with rare grasses, an inlet, a breakwater, the mouth of the Centerville River, two jetties, a row of boulders from which many families fish, a handicapped accessible fishing pier, a narrow causeway, a bath house, a parking lot and a narrow causeway (which is the only way in and out of the area by foot, bicycle, wheelchair or automobile). All of these are visited year round by residents of, and visitors to Cape Cod, often with the historical advance knowledge that it provides them with a good dose of nature, peace and solitude. It is not an off season/in season spot. The area is an important year round refuge for all.

A Home for Wildlife

Dowses provides a home and is visited by all sorts of wildlife year round – it is not an "in season/off season" spot as Avangrid has said. It is not just a "summer beach destination". Dowses does have federally protected wildlife, and I am concerned about this massive construction project's impact on them.

There should also be major concern about other forms of wildlife, including the approximately 160 bird species that visit and often make Dowses their home. These include but aren't limited to the Osprey, the Piping Plovers, the Least Terns, Saltmarsh Sparrows, Whimbrels, and the approximately 25 species of ducks. There is also abundant sea and marine life that inhabit the waters that completely surround the area, including blue crabs, oysters and other shellfish that are known to be helpful in removing nitrogen. This list could go on and on.

Avangrid's proposed project puts it all at risk. Despite their response that horizontal directional drilling will not impact many of the aforementioned and more, it is not clear or proven that this is the case. Dowses is a unique spot! It attracts unique wildlife! Installing three large cables with 1200 megawatts of power (the largest to date in the US!) is completely, and astonishingly, inappropriate. It is very clear that Avangrid has not fully explored other locations and is rather trying to take unfair advantage of the Town of Barnstable and its beautiful coastline, despite the outcry of so many residents who are just learning about this. If Avangrid goes forward with this, they would be clearly trying to pad their bottom line versus considering all factors, including permanent harm to the environment and clear lack of community support.

Although most of the Town's full time and seasonal residents didn't have any idea of Avangrid's plans for Dowses until a very recent (late October) mailing from Avangrid Renewables, it seems that, by just looking at their elaborate plans in their ENF, that Avangrid has had their sights set on Dowses for years. Why not let all the residents know in a similar way several years ago, and let them truly weigh in? For a project of this importance, the Town Council (TC) and Town Manager should not have been the only parties involved when conversations started. Regarding this cable landing, the TC has not communicated or voted with the views of the majority of residents in regard to this very impactful project. It is very clear that Avangrid does not have "community support" – something they have said they'd like in order to move forward. Although Avangrid bought these leases (for a "to be built" wind farm) from the Federal Government years ago, it does not give them the right to pick landing spots of their choosing while disregarding clear, eternal damage to the environment and ecosystem with their plans, involving very high voltage cables and a destructive construction project.

It is worth noting that the cables themselves (mentioned by an Avangrid representative on 11/16) have a lifespan of 25 years. What happens then? More damage incurred to replace them or the windmills, in addition to the ongoing, year round environmental disturbance and disruption to maintain them? I read about the three large "manhole" covers that will be covering large rectangular holes in the parking lot. How often should we reasonably expect trucks to be servicing and repairing cables? We can only guess. All of this can be avoided by Avangrid finding another way and landing their cables elsewhere – in a more appropriate spot.

Better yet, consider consolidating the efforts of the many wind power projects targeting Cape Cod and minimize overall construction costs, the multiple proposed landing sites, the number of new substations and true environmental damage from these massive construction projects.

<u>Clean Water</u>

The question of clean water and sewers has come up in discussions about this project. I'm not alone in saying that I am all for clean water, and working toward Barnstable's goals in this area. The Town has initiated the 30 year Comprehensive Wastewater Plan (CWMP). We do not need Avangrid's destructive landing at Dowses Beach to address this. Avangrid's potential financial contributions will not make a significant dent in the CWMP budget. The money that has been floated (that Avangrid "might" pay Barnstable) for the Commonwealth Wind project does not come remotely close. It is a tiny fraction of any unfunded portion of the CWMP plan. There is also faulty reasoning as it relates to the dowses beach project. A good deal of the underground cable route is not part of the 30 year CWMP plan. If Avangrid promises to offset some of our digging and paving costs only along 6.7 mile onshore route, this is also an insignificant number. This is not the place to give detailed numbers, but the figures that have been floated by Avangrid and the Town are a pittance.

Given these facts, why should the Town risk and potentially ruin its most treasured resource, Dowses Beach? Barnstable and its citizens can reach their clean water goals without Avangrid. Commonwealth Wind will bring unnecessary harm to the environment at Dowses Beach.

<u>Do citizens have a say?</u>

Some have said we don't have a choice in this – that Avangrid holds the cards

because the company bought the leases from the federal government, and that the Commonwealth of Massachusetts is in favor of offshore wind power. I find it very hard to believe that when Massachusetts truly looks into how Avangrid plans to desecrate the beaches in Barnstable – in particular an environmental treasure like Dowses Beach – that the state will permit Avangrid to execute their plan.

Avangrid may have rights to build and put up whatever windmills they want offshore (I hope not), but their onshore activities are quite another thing! Their work should align with the interests and desires of the community. Anything else would be undemocratic, and simply wrong. Avangrid doesn't have community support for this project and that's been documented in a relatively short period of time (through an Osterville Village Association survey of their membership of approximately 500 (result ratio: 10-1 opposed) and by a growing number of petition signers (1,240 plus) who include citizens that have overwhelmingly voiced concerns at recent community meetings, such as the November 16 meeting hosted by MEPA.

<u>Questions about Avangrid itself</u>
I would suggest exploring Avangrid and its parent company's true motives and intentions towards the environment and also the people of Cape Cod and the Commonwealth of Massachusetts before moving forward with this project. Here is some food for thought:

1. Avangrid is currently, and inappropriately, putting leverage on the DPU and other state regulators to agree to their terms. Avangrid signed in April 2022, post Covid, Power Purchase Agreements with Eversource, National Grid and Unitil, after prices had normalized. Now they suddenly they say need more money? Avangrid and Iberdrola S.A., its parent company, have plenty of money. They seem to be trying to take advantage of our state's campaign for alternative energy, and to squeeze more money out of the state.

2. If Avangrid doesn't want to adhere to the terms of the PPAs the company signed only seven months ago, the company should go back to the drawing board, or halt their Commonwealth Wind plans altogether. Avangrid's CEO publicly stated during the company's September 2022 investor day meeting, that their offshore leases are valuable (i.e., very salable to a willing buyer) and that the two projects, Park City Wind and Commonwealth Wind, were no longer financially viable unless these PPAs were renegotiated. If that is the case, Avangrid should sell the

leases and stop the Commonwealth Wind and Park City Wind projects! Clearly their intentions are questionable if they are raising these sorts of questions, and disrespecting the DPU and the Attorney General. This does not gel with their statements that they are committed to the well-being of Cape Cod and wind power.

3. During the Osterville Library presentation on November 16th (See OVL Nov 16th on YouTube) Avangrid represented itself to be a " local" Connecticut company that purely cares about saving the environment, cares about Cape Cod ("the electrons go to Cape Cod" even though the Park City Wind power goes to CT) , promising a thousand jobs, etc. As issues can be two sided, I would suggest to again question the true intentions of this company. For example: The electrons that would otherwise have gone to Cape Cod – are they going elsewhere? Are these jobs wind jobs? Or are they just for the Commonwealth project? How many jobs are on the Cape? How many are temporary? If local residents are hired, will this be harder on Mom and Pop businesses who already have trouble hiring workers? If not local residents, will the new workers put a further strain on below market housing? We have so little housing stock on Cape Cod...how will all of this work?

4. It is very clear that Avangrid has not fully explored other landing locations for this 1,200 megawatt, unparalleled in size, three cable landing project. They are trying to take unfair advantage of our Town and its beautiful, fragile coastline and its citizens (despite the outcry of so many residents) who are just learning about this. Avangrid needs to further explore other potential sites, perhaps off the Cape. Aren't there enough of these projects targeting Cape Cod? There are many places that are more suitable (not residential beaches that are environmentally fragile) and that would welcome this project. Combining some of these projects into sites that are less residential and environmentally unsuitable, and therefore saving the environment with far less construction, would be a healthier approach. Will this cost Avangrid a little bit more? Maybe. A little more time and thought? Perhaps. But for a 1,200 megawatt project that has a budget around $5 billion, Avangrid can afford to figure this out. And by picking a more appropriate landing site, the company would accomplish its goal of producing renewable energy – at the same time not destroying pristine, environmentally fragile, estuarine environments like Dowses Beach.

<u>Communication, Transparency and Other Concerns</u>

Unfortunately, Barnstable residents are just learning from the Town Manager (from emails that he sent to us recently) that the TC

encouraged the Covell's Beach landing for Vineyard Wind by encouraging him to speak with Avangrid in Yarmouth several years ago. These requests and conversations occurred during a time when there was limited ability for regular citizens to understand what could be happening to their coastline and roads. The true consequences of the Vineyard Wind project and the surrounding area are visible now. A commonly heard cry among residents and visitors is, "Covell's is a mess!" For three years TC has held exclusively Zoom meetings with limited public comment or interaction. If there were discussions about this or other cable projects the citizens had no say in decisions. Zoom TC meetings are not the proper way to inform the citizens and let them weigh in. Two or three minute public speaking allotments to just the few who might be picked is not enough. A first class mailing from Avangrid or the Town, shedding much more light on what would really be happening to Dowses Beach, should have gone out to all residents years ago. Now that residents see the nightmare at Covell's first-hand, there is great dismay and growing sentiment that the Vineyard Wind project was a bad idea. *Barnstable has sacrificed enough with Covells!* There is no good reason to continue Avangrid's attack on our pristine and environmentally sensitive beach areas, and they should divert their efforts elsewhere. Commonwealth Wind will only bring damage to Dowses Beach.

Along with many other citizens, I've been in a unique position to meet so many visitors to, and fans of, the whole Dowses Beach area during the last several weeks, while spreading some awareness of Avangrid's plans (no one knows!). It's been gratifying to meet so many, and hear about their love for Dowses Beach and their year round, regular visits, not only to the "sandy beach" but also to the handicapped accessible fishing pier, the Causeway and to the parking lot itself. The whole parking lot provides an unparalleled environment for many handicapped, elderly and other residents to exercise and enjoy nature year round. That will be taken away and replaced with cranes, large trucks and a fenced off construction zone if Avangrid goes forward with this project. Avangrid says the "beach" will be "open" from September through May, but in reality most of the area will be a construction zone. No one in their right mind would hazard a visit...not people or wildlife!

<u>The Causeway</u>

The causeway itself, which separates two fragile bays, will be completely closed off during the final phase of the project while Avangrid figures out how

to run 12 (split from 3) high voltage cables through it plus three additional cells. *Wow!* For a company that is brand new to the offshore wind power business in the U.S., I'm skeptical about this plan and concerned about the causeway. Have they done such delicate construction before? It seems daunting – and potentially environmentally risky, given its position dividing two fragile bays. I'd ask them serious questions about this. It is the only way in and out of the area – for walkers, bikers, wheelchairs and automobiles.

<u>More concerns about communication and Town government</u>
It is very clear that Avangrid has not fully explored other locations. Rather, they are taking unfair advantage of the Town of Barnstable and its beautiful coastline, ignoring the outcry of so many residents who are just learning about this. If allowed to go forward with this, they would be clearly trying to pad their bottom line, versus considering all factors, including the obvious lack of community support and harmful impact to the environment.

On the subject of Dowses Beach, the TC has not communicated or voted with the views of the majority of residents in regard to this critical subject. Consider, for example, the TC voted to advance host agreement discussions, disregarding so many messages from the residents to delay this. Also consider that the Town granted permission for "preliminary study work," which residents also protested. Both of these occurred in the wake of Avangrid's filings with DPU requesting time to renegotiate the PPAs!

The "preliminary studies" have included destructive large borings onshore (including adjacent to wetlands) and offshore studies with large ships. These have created a Town wide discussion and questions due to these visual impressions. People understandably have been asking, "Why is Avangrid here?" "Has the project already been approved?" "Why did the Town allow these studies to move forward, given everything we've read about this company recently and also given overwhelming public opposition to the project?" As mentioned above, many citizens respectfully asked the Town Manager and TC to halt these activities. Their wishes were ignored and dismissed. Although Avangrid purchased the offshore leases (for a "to be built" wind farm) years ago. This should not give the company the right to degrade the environment with their "studies," choose landing sites that are environmentally fragile disregarding the potential for permanent damage to the greater Dowses ecosystem. Avangrid has already generated serious havoc in our community. Don't let them further damage it! With the Covell's Beach landing by

Vineyard Wind, Barnstable has sacrificed enough.

Conclusion

Thank you for reading my comments regarding this project. I ask that MEPA shed light on the fact that the New England Wind Connector 2 project is contrary to the best interest of the Dowses Beach environment, its ecosystem, wildlife and the community members who seek it out as a safe, accessible, year round refuge. *Please consider the idea that a project like this, which touts a cleaner world, would in fact be environmentally damaging, negating its benefits*. I support wind power, other forms of renewable energy and clean water. My plea is for Avangrid to find a more environmentally suitable landing site than Greater Dowses Beach.

Sincerely,

Stacey Guenther

From: MEPA (EEA)
To: Strysky, Alexander (EEA)
Subject: Fw: Support for New England Wind 2 Connector
Date: Wednesday, November 30, 2022 4:04:47 PM

From: Regulah <conor.r.paterson@gmail.com>
Sent: Tuesday, November 29, 2022 2:14 PM
To: MEPA (EEA) <mepa@mass.gov>
Subject: Support for New England Wind 2 Connector

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hello,

I am writing to express my support for the proposal to run a wind power cable by Dowse's beach in Osterville. As a lifetime beach-goer at Dowse's, I believe it is a suitable location for this kind of infrastructure that will pose no problems to enjoying the beach and naturally beauty that abounds in the area.

Conor Paterson
32 Lovell Rd.
Osterville, MA 02655

THE COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENERGY AND ENVIRONMENTAL AFFAIRS
OFFICE OF COASTAL ZONE MANAGEMENT
251 Causeway Street, Suite 800, Boston, MA 02114-2136
(617) 626-1200 FAX: (617) 626-1240

MEMORANDUM

TO: Bethany A. Card, Secretary, EEA
ATTN: Alex Strysky, MEPA Unit
FROM: Lisa Berry Engler, Director, CZM
DATE: November 30, 2022
RE: EEA-16611, ENF – New England Wind 2 Connector

The Massachusetts Office of Coastal Zone Management (CZM) has completed its review of the above-referenced Environmental Notification Form (ENF) presented in the *Environmental Monitor* dated October 7, 2022 and offers the following comments for inclusion in the Draft Environmental Impact Report (DEIR).

Project Description

Commonwealth Wind (CWW), a wholly owned subsidiary of Avangrid Renewables, LLC, has proposed the CWW New England Wind 2 Connector project. The New England Wind 2 Connector is comprised of those elements of the broader CWW project that are subject to state jurisdiction, including components proposed within both state waters and onshore. This project will deliver approximately 1,232 megawatts (MW) of power to the ISO New England (ISO-NE) electric grid to meet the company's obligations to initially provide approximately 1,200 MW with the potential for an additional approximately 32 MW in the future.

The project includes 4 major components: the installation of three (3) 275-kilovolt (kV) high voltage alternating current (HVAC) offshore export cables within state waters; construction of a 6.7-mile underground concrete duct bank housing the onshore 275-kV transmission cables and fiber optic cable(s) from the transition vaults at the Dowses Beach Landfall Site to the proposed new onshore substation site located off Oak Street in Barnstable; construction of a new onshore substation where the 275-kV voltage onshore transmission cables will step up to 345-kV in preparation for interconnection at the existing Eversource 345-kV West Barnstable Substation; and construction of an underground duct bank which will house the 345-kV grid interconnection cables from the new onshore substation to the grid interconnection point at the existing Eversource 345-kV West Barnstable Substation in Barnstable.

Project Comments

Jurisdiction

The CWW project in its entirety is a large-scale commercial offshore wind energy facility comprised of wind turbine generators, foundations, offshore cables, and offshore substations in federal waters and export marine and land-based cables and an onshore substation within state jurisdiction. The proposed facility would produce up to 1,232 MW nameplate capacity annual renewable energy. The ENF filing covers the elements proposed within Massachusetts state boundaries, including most of the offshore export cables, all the onshore underground cables, and the proposed onshore substation. These project elements are referred to collectively in the filing as the "New England Wind 2 Connector". Although the ENF focuses on the elements proposed within state boundaries, CZM's federal consistency authority extends to activities that have reasonably foreseeable effects on any coastal use or coastal resources resulting from a federal agency activity or

federal license or permit activity. Renewable energy leases and related authorizations by the Bureau of Ocean Energy Management (BOEM) are listed as federal actions of the state's approved Coastal Management Program (CMP). While CZM's review of the entire project to ensure its consistency with policies of the CMP will occur through the BOEM renewable energy program and National Environmental Policy Act filings, as detailed below, the proponent should provide sufficient detail and information on activities in adjacent federal waters as well as potential effects on state resources and uses in subsequent MEPA filings to allow for a complete assessment of the entire project through this MEPA process.

Seafloor Disturbance

To lay the combined 69 miles of export cable, the proponent has estimated a total of 183 acres of impacts that include: 28 acres of trenching impact due to fluidization of sediments during cable laying, 82 acres of disturbance due to instrument skids, 27-33 acres disturbed due to dredging, and a range for the area of potential long-term cable protection of 29.4-35.6 acres (not presented in the ENF and estimated by CZM). In addition, the acreage of seafloor disturbed by anchor setting for construction vessels is not reported in the ENF. To evaluate the project impact under the Massachusetts Ocean Management Plan (OMP) regulations at 301 CMR 28.00, the DEIR should explicitly enumerate the acreage of seafloor disturbance associated with trenching, instrument skids, anchor setting, dredging, and long-term cable protection. Further, the acreage of disturbed seafloor within the mapped hard bottom and complex bottom, (together comprising the Special, Sensitive, or Unique [SSU] resource "hard/complex seafloor" under the OMP), should be calculated.

The ENF states that cable protection will be employed if a minimum burial depth of 5 feet (ft) is not achieved within areas of "higher risk of damage from anchor strikes." These areas of higher risk are proposed to be based on existing vessel traffic patterns and comprise the majority of the Offshore Export Cable Corridor (OECC). To minimize the use of cable protection where the risk of anchor strike is negligible, the proponent plans to use cable protection if a minimum burial depth of 3.3 ft is not achieved. The DEIR should describe what/how data will be used to determine high and low-risk vessel traffic areas. These risk areas should be represented in maps in the DEIR depicting the proposed cable routes. The proponent should consider input from CZM, the Division of Marine Fisheries (DMF), and local stakeholders such as the harbormaster(s) in determining these areas.

Ocean Management Plan

The OMP and implementing regulations at 301 CMR 28.00 set out standards for certain marine uses including submarine cables. Cable laying activities in the ocean planning area are presumptively excluded from SSU resource areas as mapped in the OMP. A project alternative that is located outside of mapped SSU resources is presumed to be a less environmentally damaging practicable alternative than a project located within a mapped SSU resource. The SSU areas that cable projects in the ocean planning area must avoid are the North Atlantic right whale core habitat, humpback whale core habitat, fin whale core habitat, areas of hard/complex seafloor, intertidal flats, and eelgrass. According to the mapped SSU resources in the 2021 OMP and the survey results reported in the ENF, it appears that SSU resources potentially impacted by the project are areas of hard/complex seafloor and eelgrass. However, the DEIR should depict the project footprint in relation to all relevant SSU areas as mapped in the 2021 OMP and as mapped via site-specific surveys for this project.

While in general cable laying projects are presumptively excluded from areas with hard/complex seafloor, the presence of relatively small areas of the hard-bottom substrate, such that

the cable route cannot be practicably located without going through, within acceptable limits, is permissible, based on review and determination by the Secretary in consultation with Executive Office of Energy and Environmental Affairs (EEA) agencies. In cases where the crossing of hard/complex seafloor is more than de minimis, the OMP siting standard requires the proponent to demonstrate that the maps delineating the SSU resources do not accurately characterize the resource or that 1) no less environmentally damaging alternative is practicable; 2) the project will cause no significant alteration of SSU resources; 3) the public benefits of the project outweigh the potential detriments posed by impacts to SSU resources.

Given that the proponent has done extensive site-specific surveys and has mapped hard and complex seafloor within the project footprint (e.g., Figures 3.0-3 and 3.0-4), the DEIR should explain how the proponent will use all practicable measures to avoid disturbing hard/complex seafloor, that no Less Damaging Environmentally Practicable Alternative to the proposed project exists, that the project will cause no significant alteration of SSU resources, and how the public benefits outweigh the detriments of the project. Section 1.2 of the ENF describes the public benefits of the project. These benefits should be considered when proposing an ocean development mitigation fee (see below).

Under the OMP and its regulations, the project is subject to an ocean development mitigation fee to compensate the Commonwealth for the unavoidable impacts of the project on the broad public interests and rights in the lands, waters, and resources of the ocean planning area and to support the planning, management, restoration, or enhancement of marine habitat, resources and uses under the Massachusetts Oceans Act. Details on the ocean development mitigation fee are contained in the OMP (Volume 1 Appendix 3) and at 301 CMR 28.06. After analyzing the temporary and permanent impacts of the project in the DEIR, the proponent should propose an ocean development mitigation fee to compensate for the unavoidable impacts of the project.

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Cable Laying

The proponent has estimated that as much as 29.4-35.6 acres of long-term cable protection—potentially composed of rocks, gabion rock bags, concrete mattresses, or half-shell pipes—may be required to ensure that cables are adequately buried beneath the seafloor. To minimize alterations to seafloor habitats, CZM discourages the use of armor, and the proponent should first attempt to lower the cable protection required through alternative means (e.g., a second plow pass or hand jetting). If cable protection is deemed necessary, the use of a top cover that is comprised of sediments whose grain size and composition mimic that of the adjacent seafloor should be employed. The proponent should work with the permitting agencies to implement the hierarchy of preferred cable protection methods presented in the ENF.

Fisheries Mitigation

The proponent is a member of the Massachusetts Fisheries Working Group on Offshore Wind Energy, the Responsible Offshore Development Alliance, the Responsible Offshore Science Alliance, and other groups concerned with the impact of offshore wind on commercial, recreational, and for-hire fisheries. As such, the proponent should be aware of the concerns associated with potential disruptions during the construction, operation, and decommissioning of the proposed project. The ENF describes efforts including fisheries studies to assess impacts associated with construction and operations, a Fisheries Communication Plan to convey information to fishers during construction implemented by fisheries liaisons and representatives, commitment to a 1 nautical mile (nm) x 1 nm turbine layout with North/South and East/West orientation, providing portable digital media with electronic charts depicting locations of New England Wind-related activities, and

developing and implementing procedures for handling compensation to fishermen for potential gear loss. The DEIR should provide an analysis of the predicted economic exposure to Massachusetts fishermen from the construction, operation, and decommissioning of the OECC in Massachusetts waters and propose a financial mitigation package to compensate fishers for lost revenue. CZM, in cooperation with the Massachusetts Division of Marine Fisheries, will review the analysis of potential economic exposure to Massachusetts fisheries through the federal consistency review process and in keeping with guidance developed by BOEM.

Underwater Archeological Resources

Under Massachusetts General Laws Chapter 6, sections 179-180, and Chapter 91, section 63, the Massachusetts Board of Underwater Archaeological Resources (MBUAR) is charged with the responsibility of encouraging the discovery and reporting, as well as the preservation and protection, of underwater archaeological resources. No person may remove, displace, damage, or destroy any underwater archaeological resource except in conformity with permits issued by MBUAR. Generally, those resources are defined as abandoned property, artifacts, treasure troves, and shipwrecks that have remained unclaimed for over 100 years, exceed a value of $5,000, or are judged by MBUAR to be of historical value. The Commonwealth holds title to these resources and retains regulatory authority over their use. MBUAR's jurisdiction extends over the inland and coastal waters of the state. Underwater archaeological resource identification surveys, site examinations, responses to unanticipated discoveries, and any mitigation activities conducted for the project within the Commonwealth's waters must conform to the MBUAR statute and regulations and published *Policy Guidance for the Discovery of Unanticipated Archaeological Resources* and be conducted under an MBUAR Special Use Permit. The proponent should consult closely with the MBUAR, and a marine archaeological resources assessment and mitigation proposal that is prepared for the project should be provided to MBUAR for review.

Coastal Resource Delineation

The wetland resource areas delineated in Attachment B, and Figure 6 in the ENF show that Dowses Beach is a barrier beach. However, the delineation shows a gap in the coastal dune where it is lower and unvegetated, as well as in the footprint of the parking lot and roadway. Barrier beaches, by definition, are composed of coastal beaches and coastal dunes. Although there has been a modification of the coastal dune form, the area landward of the annual high tide line on a barrier beach is typically a coastal dune. It appears that Attachment B may not be consistent with the wetland resource area delineations shown in other plans included with the ENF. For example, in Attachment F1, the construction staging plans show a coastal bank on the barrier beach. Inconsistencies such as this should be corrected in the DEIR. Detailed guidance for differentiating coastal beaches and coastal dunes, and delineation of other coastal resource areas is available in Chapter 1 of Applying the Massachusetts Coastal Wetlands Regulations: A Practical Manual for Conservation Commissions to Protect the Storm Damage Prevention and Flood Control Functions of Coastal Resource Areas (aka the Coastal Manual). Coastal resource area delineations should be reviewed and updated as necessary for inclusion in the DEIR based on the Coastal Manual. CZM is available to provide technical assistance as needed regarding coastal resource area delineations.

Coastal Barrier Resource Unit

CZM notes that Dowses Beach is a Coastal Barrier Resource Unit as mapped by the U.S. Fish and Wildlife Service. There are limitations to federal funding and assistance associated with projects in these areas. Implications to the proposed project should be identified and described as applicable in the DEIR.

Coastal Resiliency

The preferred cable landing locations at Dowses Beach in Barnstable are in Velocity flood zones, elevation 15 and 14 NAVD 88, as mapped by the Federal Emergency Management Agency on their Flood Insurance Rate Maps (FIRMs). The preferred cable route from the landing location traverses the Dowses Beach Road causeway between Phinney's Bay and East Bay, which is also within a mapped Velocity Zone. The landing locations for the three cables and the route across the causeway are low-lying, with low-lying beach and dune systems located seaward. As a result, the landing locations and cable routes are vulnerable to erosion and overwash in moderate to major coastal storms. The DEIR should further describe the vulnerabilities of the proposed project and how the project was designed to minimize and reduce risk from coastal effects as discussed below.

According to the ENF, the Massachusetts Shoreline Change data was reviewed and applied to the proposed project. However, as discussed at the MEPA meeting, the shoreline change data is not a useful data source for quantifying the vulnerability of the project shoreline to coastal erosion in moderate to major coastal storms due to the infrequency of these storm events in this area. The primary vulnerability of south-facing shorelines in Massachusetts is to hurricanes. Since the shoreline change data set averages change over a long time horizon and the major hurricanes that cause changes to the shoreline occur once every 75-100 years, the actual effects of these infrequent but impactful storms may be artificially reduced.

As critical infrastructure, the proposed energy-producing facility should be designed to continue operating through a moderate to a major hurricane (i.e., a 500-year storm) for the life of the project. The DEIR should include an analysis of 1) likely nearshore, beach, and dune erosion at the preferred landing site to ensure the cables and associated infrastructure maintain adequate burial depth over the design life of the project; 2) potential impacts to the cable route as a result of erosion and storm surge; 3) potential effects of back-to-back storms, such as Hurricanes Carol and Edna in 1954; and 4) the extent of future flood zones including sea level rise using best available information as provided through the Massachusetts Coast Flood Risk Model (MC-FRM) in 2030, 2050, and 2070. Although the MC-FRM outputs from the Climate Resilience Design Standards Tool delineate the potential extent of flood zones with sea level rise, the outputs do not account for the effects of erosion or other landform change. These should be evaluated by the proponent separately. The Climate Resilience Design Standards Tool Project Report included in Appendix G was run in July 2022 and does not include the most recent updates released in September. The Tool should be re-run to obtain the flood depths for the scenario years for this project. Depending on the outcome of the analysis described above, alternative designs and/or mitigation may be necessary to ensure the proposed infrastructure continues to operate for the life of the project.

Species of Concern

The Natural Heritage and Endangered Species Program (NHESP) has established Priority Habitat for Piping Plover along the Centerville Harbor shoreline that includes Dowses Beach, the proposed offshore export cable landing site, as well as the alternative landing site at Wianno Avenue Beach. According to the ENF, a Piping Plover Protection Plan will be finalized as part of the Massachusetts Endangered Species Act permitting process that will commence upon the conclusion of the Massachusetts Environmental Policy Act (MEPA) review. In addition, as documented in a supplemental letter dated December 17, 2021, the proponent has committed to implement a conservation program to research and address the impacts of offshore wind development on coastal waterbird populations. The program will include research, conservation, and habitat restoration measures for avian populations that nest, forage, or migrate through offshore wind project areas. The

proponent should continue to coordinate with the NHESP and other state agencies to develop the specifics of the program including partners, funding, timing, and specific projects. The development of the coastal waterbird conservation program will also be reviewed as part of CZM's ongoing federal consistency review process.

Monitoring Plan

To compare the predicted impacts as presented through the MEPA process with actual project impacts, the proponent should implement a monitoring program that includes both short-term and long-term studies that quantify the physical effects of dredging, plowing, and cable laying on seafloor topography, benthic infauna, and sediment grain size; the extent, duration, and concentration/depth of suspended solids/sediment drape and any effects on flora and fauna (e.g., eelgrass); and the as-built location and long-term burial of the export cables. The DEIR should include a Benthic Habitat Monitoring Plan (BHMP) associated with the proposed cable laying. The proponent should continue to engage state and federal agencies in a dialogue as the project plans and schedules develop to finalize a BHMP for this project.

Geophysical surveys of the export cables should be conducted immediately after construction to document and ensure cable location and burial depth. These surveys should include bathymetric analyses that depict the change in seafloor height after construction as compared to preconstruction. Reports on as-built cable depth and any near-term changes in seafloor topography should be discussed with the resource agencies so that remediation options, if necessary, can be discussed and implemented. As part of the MassDEP 401 Water Quality Certification process, the proponent should develop a plan to assess and ensure cable burial depth at regular intervals and after significant storm events so that other water-dependent uses are not threatened or impeded by any exposed cable segment.

Lastly, total suspended solids concentrations during construction, both within and outside of the affected construction area should be monitored and an analysis of the depth and extent of sediment drape associated with the settling of suspended sediments should be provided. The goal of this monitoring is to discern the magnitude and duration of impacts that occur during construction and to identify impacts that are beyond the temporal and spatial scope modeled for the project and described in the ENF.

Article 97

Article 97 lands include the Dowses Beach Landfall Site, the onshore transmission cable route along Dowses Beach Road, and the lands required for Grid Interconnection Option G1 and Grid Interconnection Option G2. Consistent with Article 97, authorization will be required from the Massachusetts Legislature as well as approval from the Town of Barnstable for the disposition of new easement rights within these areas. The DEIR should identify the existing restrictions on these parcels held for conservation, preservation, or agricultural or watershed preservation purposes, and describe how the proposed project protects the interests of these provisions and provides an overriding public benefit.

Federal Consistency Review

The proposed project is subject to CZM federal consistency review and must be found to be consistent with CZM's enforceable program policies. For further information on this process, please contact Robert Boeri, Project Review Coordinator, at robert.boeri@mass.gov, or visit the CZM website at https://www.mass.gov/federal-consistency-review-program.

LE/tc/rh/sm/rlb
CZM# 5322

Cc: David Robinson, BUAR
Todd Callaghan, MACZM
Steve McKenna, MACZM
Rebecca Haney, MACZM
Bob Boeri, MACZM
Dan McKiernan, MADMF
John Logan, MADMF
Mark Rousseau, MADMF
Darcy Karle, Town of Barnstable
Jane Varkonda, Town of Edgartown
Jeff Carlson, Town of Nantucket
Susan Tuxbury, NMFS
Kaitlyn Shaw, NMFS
Ed Reiner, USEPA
Tim Timmermann, USEPA
Amy Hoenig, MA NHESP
Eve Schluter, MA NHESP
David Wong, MassDEP
David Hill, MassDEP

From: MEPA (EEA)
To: Strysky, Alexander (EEA)
Subject: Fw: 11.29.22 Comment to NE Wind 2 ENF
Date: Wednesday, November 30, 2022 4:11:28 PM
Attachments: 11.29.22 Comment to NE Wind 2 ENF.pdf

From: Jerome Miranowski <jeromemiranowski@gmail.com>
Sent: Tuesday, November 29, 2022 11:28 AM
To: MEPA (EEA) <mepa@mass.gov>
Subject: 11.29.22 Comment to NE Wind 2 ENF

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Attached please find my comments to the New England Wind 2 Connector Environmental Notification Form. Thank you.
Jerome Miranowski

Jerome Miranowski
126 Scudder Road
Osterville, Massachusetts 02655
jerome.Miranowski@gmail.com

Secretary Bethany A. Card
Attn: MEPA Office
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114
mepa@mass.gov

Re: New England Wind 2 Connector
Environmental Notification Form

Dear Ms. Card:

Thank you for the opportunity to comment on the Environmental Notification Form submitted by Avangrid Renewables, LLC, through its wholly owned subsidiary, Commonwealth Wind, LLC (the "ENF").

My wife and I reside at 126 Scudder Road in Osterville, a little over a mile from Dowses Beach. We use the beaches at Dowses Beach frequently throughout the year to walk and to enjoy the views of Nantucket Sound and East Bay. Dowses Beach is a unique and special place, almost completely surrounded by water, accessible only by a narrow causeway, and featuring beaches on both the sound and the bay and an accessible fishing dock on the channel connecting the two.

I am a big supporter of wind power, both for environmental and national security reasons. I certainly support the efforts of Avangrid and others to make wind power a reality. However, after reading the ENF and watching the recording of the November 16, 2022, MEPA meeting at the Osterville Library, I am very concerned with the manner in which Avangrid intends to bring the power generated by its turbines to the electrical grid.

First, the New England Wind 2 Connector is the third of three projects proposed by Avangrid to bring the electricity generated by the wind turbines to the electrical grid. Avangrid proposes to bring that electricity ashore at *three* different public beaches and proposes to construct duct banks under public roads over *three* different routes in order to bring all of the electricity to West Barnstable to connect to the grid. All of that construction will signficantly disrupt the lives of the residents of Osterville and Centerville and will itself use valuable energy and resources.

Second, even if all three routes are an engineering necessity, Avangrid doesn't appear to have made a sufficient effort to minimize the disruption that will be caused by its

construction of vaults and duct work at Dowses Beach during construction. The location of the vaults to be built in the Dowses Beach parking lot and the construction zones designated by Avangrid will seriously disrupt the use of Dowses Beach during the estimated18 months of construction. That disruption can be significantly reduced if Avangrid designs, stages, and schedules the construction in the Dowses Beach parking lot to allow access to the beaches and fishing dock and make use of the natural terrain of the site to shield the beach from the construction.

Based on these concerns, I have the following questions for Avangrid:

(1) *Can some or all of the power proposed to be landed at Dowses Beach be landed at Covell's Beach, Craigville Beach, or a combination of the two?* (I ask this question not to impose greater burdens on our neighbors in Centerville but to minimize the overall disruption caused by these projects. Consolidating some of the necessary infrastructure will reduce the overall disruption. Also, the geography of the Centerville beaches, laid out along a long stretch of shore accessible at all points by a public road, allows continuous access to the beach and a large portion of the parking lot even during construction.) *If the answer to that question is "no," please explain in detail why that is not possible. Do you have an engineering opinion supporting that answer?*

(2) *If the Dowses Beach landing is an engineering necessity, can all three vaults be constructed on the northeast half of the parking lot?* The ENF appears to contemplate the construction of the first vault near the entrance to the parking lot. The designated construction zone blocks access to the main entrance to the beach. Construction in that location would be visible from the beach. Access to the beach would require driving past the construction area down a narrow lane and use of one of of the secondary access points through the dunes to reach the beach on the sound. Construction of the first vault on the northeast half of the parking lot, where the other two vaults are proposed, would put the construction of all three vaults behind the long dune that runs from the main entrance to the beach to the end of the beach. *If the answer is "no," why not? Can the construction zone designated for the second and third vaults be modified to permit access to the beach on East Bay and the fishing dock? If not, why not? Much of the current construction zone at Covell's Beach is used for parking vehicles used by workers to reach the site. Are there other parking locations that can be used by construction workers, e.g., at the entry to the beach off of East Bay Road? Can Avangrid commit to a more specific construction period other than "not in the summer months?"*

I appreciate the efforts of Avangrid to bring environmentally responsible energy to this area. I hope that Avangrid will work with our community to bring that energy ashore in an environmentally and socially responsible way as well.

Sincerely,

Jerome Miranowski

From:	MEPA (EEA)
To:	Strysky, Alexander (EEA)
Subject:	Fw: New England Wind 2 Connector - AVANGRID ENF DATED 9-30-2022
Date:	Wednesday, November 30, 2022 4:02:53 PM
Attachments:	Comments on the Dowes Beach Environmental Impact Reoport AVANGRID in their ENF dated 9-30-2022.pdf

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From: Jerome Vigil <jeromevigil@gmail.com>
Sent: Wednesday, November 30, 2022 1:29 AM
To: MEPA (EEA) <mepa@mass.gov>
Subject: New England Wind 2 Connector - AVANGRID ENF DATED 9-30-2022

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Ladies & Gentlemen,

Pl;ease review my comments on this critical project.

Thank You

Jerome Vigil, PhD.
142 Bay Lane
Centerville, Ma. 02632

Jerome Vigil
142 Bay Lane
Centerville, MA 02632

November 29, 2022

Secretary Bethany A. Card
MEPA Office
Executive Office of Energy & Environmental Affairs
100 Cambridge St, Suite 900
Boston, Ma 02114

RE: NE Wind 2 Connector –
Commonwealth Wind aka
AVANGRID
Environmental Notification
Form (ENF) Application Critique
Dowes Beach Landing

Dear Secretary,

I have a number of concerns in regard to the proposed ENF submission before MEPA for their review.

My neighbors and I ask that you thoroughly study this Application for all of us.

Some concerns are as follow:

1. The proposed landing in Dowes Beach Parking Lot makes no sense. This is absurd.
2. We all spend time on Dowes Beach all year long. We don't want give up our pristine times for this work. This is so untenable.
3. There are other considerations that have not been considered. AVANGRID needs to address this.
4. Why didn't AVANGRID consider 230 East Bay Rd for their landing??? A Landing Electric Splicing Vault could be put on this property which is owned by the Town of Barnstable. This would not disrupt Dowes Beach nearly as much. The Directional Boring Equipment could be sited on that property. AVANGRID's cables could come onto land via East Bay. The cables could then travel up East Bay Rd. to Main St. and up Old Mill Rd. and alitmately ending up at AVANGRID's Substation. This route would eliminate conduits crossing the Culvert on Dowes Beach Rd and also avoid crossing the Bumps River Bridge on S. Main St. AVANGRID has no common sense!!
5. How does anyone know that there won't be a cable fault? The 247KV lines to the AVANGRID Substation and 347KV lines to the Eversource Substation are subjct to failure do to their High Voltage and hence leakeage to ground potential at any time and place. Where is AVANGRID going to be when this happens? Who knows!! Cables are made by humans who have faults and who knows how much testing will be performed on these cables before they are energized??
   We were told the cables are being made by the PRISMIAN GROUP a firm based in Milan, Italy. Yes they set up a factory in the UAS to construct this cable but why wasn't Okonite, an old lin tried and true American calble manufacturer chosen?? Money I'm sure!!!

6. No mention was made of the possibility of disturbing Native First Nations sites. Why???
7. Why weren't the politicians who are pushing this project forward at the recent hearing ?? I'll tell you why they are afraid of ridicule from their constituents! We citizens are lost in the mire of those in power. Why do we vote for people that can't defend our way of life??
8. Habitats will be disturbed . How is AVANGRID going to protect these Habitats???
9. Most of us believe that we have to do our best to reverse Global Warming and Wind Energy is one small aspect of this effort, however, there are many other efforts that need to be made. Those with the ability to make change are not driven by this the are driven by GREED!!! If they could only apply commonsense mentality to their efforts we might be responsive to their goals.

Please give my concerns very serious consideration and hold this ENF application until it is further reviewed and with full information are submitted.

Thank you for your time and consideration.

Sincerely,

Jerome Vigil

Jerome Vigil, PhD.

MASSWILDLIFE

DIVISION OF
FISHERIES & WILDLIFE

1 Rabbit Hill Road, Westborough, MA 01581
p: (508) 389-6300 | f: (508) 389-7890
MASS.GOV/MASSWILDLIFE

November 30, 2022

Bethany Card, Secretary
Executive Office of Energy and Environmental Affairs
Attention: MEPA Office
Alex Strysky, EEA No. 16611
100 Cambridge Street
Boston, Massachusetts 02114

Project Name:	*New England Wind 2 Connector*
Proponent:	*Commonwealth Wind LLC*
Location:	*Offshore export cables from a proposed 1,232 megawatt (MW) wind generation facility within Federal waters through Massachusetts waters northerly through Nantucket Sound to Dowses Beach, Barnstable (Preferred Route). Onshore routes (Main Street and Old Mill Road Alternatives) from Dowses Beach to a proposed substation off Oak Street, Barnstable.*
Project Description:	*Utility- Transmission Cables*
Document Reviewed:	*Environmental Notification Form*
EEA File Number:	*16611*
NHESP Tracking No.:	*17-37398*

Dear Secretary Card,

The Natural Heritage & Endangered Species Program of the Massachusetts Division of Fisheries & Wildlife (the Division) has reviewed the Environmental Notification Form (ENF) for the proposed New England Wind 2 (NEW2) Connector and would like to offer the following comments.

The Commonwealth Wind offshore and onshore components, as currently proposed, will occur within areas of Priority Habitat and Estimated Habitat for state-listed species. The Preferred Route offshore will occur within key migratory and foraging habitat for the state-listed terns listed below. The Preferred Route onshore at Dowses Beach will occur within nesting habitat for Piping Plover and Least Tern. Additionally, the Old Mill Road Alternative will occur within Priority Habitat for Water Willow Stem Borer.

Scientific Name	Common Name	Taxonomic Group	State Status
Sterna dougallii	Roseate Tern	Vertebrate - Bird	Endangered*
Sterna hirundo	Common Tern	Vertebrate - Bird	Special Concern
Sternula antillarum	Least Tern	Vertebrate - Bird	Special Concern
Charadrius melodus	Piping Plover	Vertebrate - Bird	Threatened*
Papaipema sulphurata	Water-willow Stem Borer	Invertebrate - Moth	Threatened

*Species also protected pursuant to the U.S. Endangered Species Act (ESA, 50 CFR 17.11).

These species and their habitats are protected pursuant to the Massachusetts Endangered Species Act (M.G.L c. 131A) and its implementing regulations (MESA, 321 CMR 10.00). State-listed species habitats are also protected pursuant to the rare wetland wildlife provisions of the Massachusetts Wetlands Protection Act and its implementing regulations (WPA, 310 CMR 10.00). This project will require a direct filing with the Division for compliance with the MESA and the rare species provisions of the WPA.

Renewable energy sources, such as offshore wind power, would reduce the reliance upon fossil fuels, provide zero-emissions energy generation, and are necessary to achieve the Commonwealth's renewable energy requirements. Wind energy generation can have unintended impacts, particularly upon avian species. Thus, the wind energy planning, review and permitting processes must thoroughly and comprehensively assess impacts and risks to imperiled birds – this is particularly critical for imperiled bird populations with existing stressors, including, small population sizes, low reproduction or recruitment rates, and compounding factors related to climate change.

Background

Massachusetts is a globally significant nesting, feeding, staging and overwintering area for numerous migratory birds, from common waterfowl to ESA-and MESA-listed bird species. A large proportion of the North American Roseate Tern (ESA- & MESA-Endangered) population and Atlantic Coast Piping Plover population (ESA- & MESA-Threatened) are reliant upon Massachusetts for reproduction. As such, Massachusetts's responsibility for state- and federally-listed coastal waterbirds is disproportionately high. To that end, the Division has expended considerable funds and resources to protect and manage these birds, as well as restore nesting habitat.

As a result of management efforts occurring since the 1980s, Massachusetts supports over 740 pairs of Piping Plover (almost 40% of the Atlantic Coast breeding population). The Commonwealth also supports approximately 50% (about 2,200 pairs) of the North American Roseate Tern population on three islands actively managed by the Division since the 1990s (previously managed by other organizations since the 1960s). In addition, the Division manages significant nesting colonies of Common and Least terns.

ESA- and MESA-listed terns forage in the waters surrounding Massachusetts during the nesting, staging, and migratory seasons. The post-breeding tern aggregation ("staging") beaches of Cape Cod, Martha's Vineyard, and Nantucket are used during July – September. These sites are regionally and continentally important migratory preparation areas where adults care for fledged young until they become proficient at feeding themselves and birds put on body mass for their over-sea journey to wintering areas in South America. These staging areas appear to support a majority if not all the North American Roseate Tern population (Jedrey et al. 2010).

Onshore Components

The Preferred Alternative for onshore components, including, cable route, new substation site and proposed substation off Oak Street, Barnstable primarily avoid areas identified as Priority and Estimated Habitat for state-listed species. However, there are two exceptions: the proposed cable landfall location at Dowses Beach and the conduit installation at Bumps River Road (Old Mill Road Alternative) are located within Priority Habitat for state-listed species. The proposed cable landfall at Barnstable's Dowses Beach provides important nesting habitat for the Piping Plover and Least Tern. Additionally, the beaches within larger Centerville Harbor provide nesting, feeding and staging habitat for state-listed terns species.

The ENF identifies that the onshore transmission cable route for the Old Mill Road Alternative is located entirely within public roadway layouts. The Division notes that the conduit installation at Bumps River Road (Old Mill Road Alternative) may qualify for an exemption from the MESA pursuant to 321 CMR 10.14(10).

Within the ENF, the Proponent references a Piping Plover Protection Plan that was approved for the Vineyard Wind Connector 1 (EEA #15787) project. The cable landing location associated with Commonwealth Wind/ NEW2 Connector is proposed at Dowses Beach, Barnstable. Dowses Beach is nesting habitat for both Piping Plover and Least Tern. Thus, at this time and without site specific details regarding construction and restoration timelines, temporary impacts, etc., the Division cannot to assess whether the Piping Plover Protection Plan would be adequate and sufficient to avoid both temporary and permanent impacts to state-listed plovers and terns as well as their habitats.

Offshore Components

Based on the information provided within the ENF, the offshore cable installation process is anticipated to impact up to 183 acres of wetlands in state waters. The impacts associated with the cable installation in state waters are described as temporary impacts. For context, the Proponent provides an overview of the Commonwealth Wind Project located within both state and federal waters (ENF Attachment A, Section 2). As the inter-array cables, foundations, wind turbine generators (WTG's) and other components of the Commonwealth Wind (1,232 MW) project are located within federal waters, the Division anticipates providing comments through the Bureau of Ocean Energy Management (BOEM) National Environmental Policy Act (NEPA) process or coordinating through the Office of Coastal Zone Management Federal Consistency process, as appropriate. However, given the Division's responsibility of managing and protecting ESA- & MESA-listed avian species and the importance of Massachusetts both nationally and continentally, the Division would like to offer the following comments relative to offshore components.

Acknowledged in BOEM's Supplemental Draft Environmental Impact Statement (SDEIS) for Vineyard Wind 1, the construction and operation of wind turbine generators is expected to result in direct mortality of Common Tern, a MESA-listed avian species. Thus, cumulative impacts to MESA-listed species associated with Park City Wind (New England Connector 1) and now Commonwealth Wind (New England Connector 2) can also reasonably be expected.

As previously identified, a large proportion of the North American Roseate Tern population is reliant upon Massachusetts for nesting (primarily, on Bird, Ram & Penikese Islands managed by the Division). Massachusetts breeding Roseate Terns and those that breed in New York (Great Gull Island) convene in Massachusetts waters during the staging period (July - September) prior to migrating south. Thus, in addition to Common Terns, and because a large proportion of the population of this imperiled avian species is likely to forage within and travel through the Vineyard Wind Lease Area, wind turbine generators (WTGs) are also anticipated to result in direct mortality to Roseate Terns and other avian species (e.g., Least Tern and Piping Plover).

Therefore, the Proponent should consult with the Division to develop and integrate suitable conservation measures to mitigate unavoidable project impacts to affected imperiled avian species associated with Vineyard Wind 1, Park City Wind, and now also Commonwealth Wind. Conservation measures may include, but are not limited to, support for ongoing tern colony and plover monitoring and management and the restoration and enhancement of critical nesting habitats. These actions would

provide meaningful and measurable benefits to the Roseate Tern and because terns typically nest in mixed species colonies, would also benefit other avian species.

The Division notes, as part of the Secretary's February 1, 2019 Certificate on the MEPA FEIR for Vineyard Wind Connector 1, it was requested that the Proponent develop a comprehensive post-construction monitoring and adaptive management plan for avian species and support conservation measures that provide meaningful and measurable benefit to these species. To date, the Proponent has not provided such a plan or consulted with the Division regarding mitigative measures, as identified in both the NEPA and MEPA review processes.

Conclusion

The Proponent should evaluate all alternatives to reduce or minimize impacts to avian species, for both onshore and offshore project components; this is particularly important relative to cumulative impacts from Vineyard Wind Connector 1, New England Wind Connector 1, New England Wind Connector 2 and their associated offshore components (Vineyard Wind 1, Park City Wind, and Commonwealth Wind), and potential future development within the Proponent's offshore Lease Areas.

Given the Division's responsibility to protect and manage imperiled avian resources, every effort should be made to avoid and minimize risks, as well as monitor and mitigate unavoidable Project impacts to the Commonwealth's wildlife resources. Through such efforts, we can ensure that offshore wind projects not only contribute to meeting critical renewable energy needs, but also help to ensure healthy populations of coastal waterbirds, including vulnerable MESA and ESA-listed species, for the benefit of our citizens.

The Division will not render a final decision until the MEPA review process and associated public and agency comment period is completed, and until all required MESA filing materials are submitted by the Proponent to the Division. As our MESA review is not complete, no alteration to the soil, surface, or vegetation and no work associated with the proposed project shall occur until the Division has made a final determination.

If you have any questions about this letter, please contact Amy Hoenig, Endangered Species Review Biologist, at (508) 389-6364 or Amy.Hoenig@mass.gov. We appreciate the opportunity to comment on this project.

Sincerely,

Everose Schlüter, Ph.D.
Assistant Director

cc: Commonwealth Wind LLC
Marc Bergeron, Epsilon Associates, Inc.
Barnstable Board of Selectmen

Barnstable Conservation Commission
Barnstable Planning Department
DEP Southeast Regional Office, MEPA
Lisa Engler, CZM
Bob Boeri, CZM

References

Jedrey, E. L., R. J. Harris, and E. A. Ray. 2010. Roseate Terns— citizens of the world: the Canada to Cape Cod connection. Bird Observer 38:146-150.

The COMMONWEALTH OF MASSACHUSETTS
BOARD OF UNDERWATER ARCHAEOLOGICAL RESOURCES
EXECUTIVE OFFICE OF ENERGY AND ENVIRONMENTAL AFFAIRS
251 Causeway Street, Suite 800, Boston, MA 02114-2136
Tel. (617) 626-1014 Fax (617) 626-1240
www.mass.gov/orgs/board-of-underwater-archaeological-resources

December 5, 2022

Bethany A. Card, Secretary
Executive Office of Energy and Environmental Affairs
Attention: Alexander Strysky, MEPA Unit (via email attachment)
100 Cambridge Street, Suite 1020
Boston, MA 02114

RE: Commonwealth Wind, LLC (a wholly owned subsidiary of Avangrid Renewables, LLC): EEA #16611 – New England Wind 2 Connector Project

Dear Secretary Card,

The staff of the Massachusetts Board of Underwater Archaeological Resources (MBUAR or the Board) has reviewed the above-referenced proposed project as detailed in the Environmental Notification Form (ENF) presented in the *Environmental Monitor* of October 7, 2022. We offer the following comments.

The New England Wind 2 Connector is comprised of those elements of the broader Commonwealth Wind project that are subject to state jurisdiction, including components proposed within both state waters and onshore. The project includes 4 major components, one of which – the installation of three 275-kilovolt high-voltage alternating current offshore export cables making landfall at the Dowses Beach Landfall Site in Barnstable – will impact the seafloor and, therefore, have the potential to displace, damage, or destroy underwater archaeological resources within state waters.

The proponent notes in the ENF that the proposed locations of the New England Wind 2 Connector Project's offshore export cables lie almost entirely within previously surveyed, mapped and characterized Offshore Export Cable Corridor(s) (OECC) (i.e., the Vineyard Wind 1 and New England Wind 1 OECC survey envelopes). Underwater archaeological identification survey was completed and mitigation investigations are currently being performed by the proponent's marine archaeological consultant within the Vineyard Wind 1 OECC under MBUAR Special Use Permit 17-003. Identification survey of the New England Wind 1 OECC is being performed by the proponent's marine archaeological consultant under MBUAR Special Use Permit 21-006, issued December 17, 2021, and extended until January 26, 2023. MBUAR awaits receipt of the final results from the mitigation investigations and from the New England Wind 1 OECC identification survey. Marine archaeological identification survey of the state waters portion of the Vineyard Wind Connector 1 Project OECC determined that the offshore component of the waters within and in the vicinity of the OECC possessed a high density of post-contact period shipwrecks and contained numerous areas of submerged paleolandscapes with archaeological sensitivity for potentially containing submerged Native American archaeological deposits.

In consideration of these results, as well as Nantucket Sound's status as a National Register of Historic Places-eligible Traditional Cultural Property (TCP) considered significant for the region's Wampanoag Tribes, the New England Wind 2 Connector Project's offshore export cables proposed location almost entirely within the previously surveyed, mapped, and characterized Vineyard Wind 1 OECC survey envelope, and MBUAR's preliminary review of its files and secondary literature sources to identify known and potential underwater archaeological resources within the proposed project area, MBUAR concludes that the New England Wind 2 Connector Project area may be generally archaeologically sensitive for both pre-contact period and post-contact period (principally shipwrecks) underwater archaeological resources.

Under Massachusetts General Laws Chapter 6, sections 179-180, and Chapter 91, section 63, the MBUAR is charged with the responsibility of encouraging the discovery and reporting, as well as the preservation and protection, of underwater archaeological resources. No person may remove, displace, damage, or destroy any underwater archaeological resource except in conformity with permits issued by MBUAR. Generally, those resources are defined as abandoned property, artifacts, treasure troves, and shipwrecks that have remained unclaimed for over 100 years, exceed a value of $5,000, or are judged by MBUAR to be of historical value. The Commonwealth holds title to these resources and retains regulatory authority over their use. MBUAR's jurisdiction extends over the inland and coastal waters of the state.

Underwater archaeological resource identification surveys, site examinations, responses to unanticipated discoveries, and any mitigation activities conducted for the project within the Commonwealth's waters must conform to the MBUAR statute and regulations and published *Policy Guidance on Archaeological Investigations and Related Survey*

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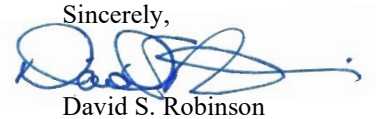
Standards for the Discovery of Underwater Archaeological Resources and *Policy Guidance for the Discovery of Unanticipated Archaeological Resources* and be conducted under an MBUAR Special Use Permit.

The proponent should consult with the MBUAR to develop for MBUAR's review and comment a project-specific proposal, submitted as part of an MBUAR Special Use Permit application for the project, that provides for complete marine archaeological identification survey coverage for the entire state waters portion of the New England Wind 2 Connector Project's area of potential effect, in conformance with MBUAR statute, regulations, and policy guidance documents.

The Board appreciates the opportunity to provide these comments as part of the MEPA review process. Should you have any questions regarding this letter, please do not hesitate to contact me at the address above or by email at david.s.robinson@mass.gov.

Sincerely,



David S. Robinson
Director

/dsr

Cc: Brona Simon, MHC
Robert Boeri, Todd Callaghan, Lisa Engler, Rebecca Haney, Stephen McKenna, MCZM (via email attachment)
Bettina Washington, WTGH/A (via email attachment)
David Weeden, MWT (via email attachment)

From:	Janet Williams
To:	Strysky, Alexander (EEA)
Subject:	Letter of Support: Commonwealth Wind
Date:	Tuesday, December 6, 2022 6:53:28 AM
Attachments:	Commonwealth Wind Letter of Support.11.23.22.pdf

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CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Please accept the attached letter of support with respect to the New England Wind Connector 2 (EEA No. 16611).

Please contact me if you have any questions. Thank you.

Sincerely,
Janet E. Williams, Vice President
Board of Directors, Cape Cod Climate Change Collaborative

VIA EMAIL ONLY
Alexander.strysky@mass.gov

November 23, 2022

Mr. Alex Strysky, Environmental Analyst
Massachusetts Environmental Policy Act Office
100 Cambridge Street
Boston, MA 02114

RE: New England Wind Connector 2 (EEA No. 16611)

Dear Mr. Strysky,

Thank you in advance for taking the time to consider our comments on the New England Wind Connector 2, currently before the Massachusetts Environmental Policy Act Office. We wish to voice our strong support for both AVANGRID's third project, Commonwealth Wind, as well as its grid interconnection in Barnstable, New England Wind Connector 2.

We are writing on behalf of the Cape Cod Climate Change Collaborative, a non-profit 501(c)(3) organization whose mission is to reduce ways in which the Cape & Islands region contributes to climate change and to protect our region from its potentially devastating impacts.

Both AVANGRID's Vineyard Wind 1 Connector and New England Wind 1 Connector have been approved by the state, and New England Wind Connector 2 builds upon the first two projects; New England Wind Connector 2 will use the same installation methods, follow a similar shared corridor below the seabed, and connect to the grid in the town of Barnstable.

AVANGRID's offshore wind projects are a vital element of the Commonwealth's overall clean energy strategy. Commonwealth Wind will generate more than 1,200 megawatts of clean, renewable offshore wind energy and supply it directly to New England's grid. Constraints on our existing electric grid are well documented and lead to both price volatility for consumers as well as reliance on oil and natural gas for electric generation. Commonwealth Wind will provide electricity to approximately 700,000 homes across the state and reduce our greenhouse gas emissions by 2.35 million US tons per year, the equivalent of taking more than 460,000 cars off the road.

In its other projects, AVANGRID has demonstrated and will continue to demonstrate with New England Wind Connector 2, that it has performed all necessary due diligence with respect to environmental safety plans for landing cables under Dowses Beach in Barnstable.

Construction work will be entirely limited to paved areas of the beach's parking lot. No construction will occur along the coastal beach or dunes as a result of the company employing horizontal directional drilling (HDD) methodology which avoids impacts to these coastal resources by burying the cable deep beneath the surface.

AVANGRID has proven expertise and demonstrated its desire to partner with the town of Barnstable. Barnstable's Town Council just recently voted unanimously to begin Host Community Agreement negotiations for Commonwealth Wind. I

We urge you to expeditiously review and approve New England Wind Connector 2.

Respectfully,

Dorothy A. Savarese

Dorothy Savarese, President of the Board

From: John Crow
To: Strysky, Alexander (EEA)
Subject: Fwd: As offshore wind plans grow, so does the need for transmission | WBUR News
Date: Tuesday, December 6, 2022 3:51:53 PM

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Alex,

Thought you might find this article interesting. It goes along with what we are saying here in Osterville about making sure Clean Energy isn't Done Dirty. This approach would alleviate the need for countless landings on pristine beaches all up and down the Atlantic coast and save ratepayers millions in onshore upgrade costs at the same time. A true win-win.

Thanks for keeping the dialog going on this.

Kindest regards,
John Crow
Osterville Village Association

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> https://urldefense.com/v3/__https://www.wbur.org/news/2022/10/18/offshore-wind-transmission-lines-grid__;!!CUhgQOZqV7M!gWRisSYEUsYUFyZezuItdgM-djbWj-OrVNoYTLxZuMQju6R7UD01ZczxQpP4nDrpJZlUQWi1_pr5CKMNh8yWUOnIbRPT$

From: acarroll@carrollconsulting.com
To: Strysky, Alexander (EEA)
Cc: Hector Guenther
Subject: As offshore wind plans grow, so does the need for transmission | WBUR News
Date: Tuesday, December 6, 2022 4:14:07 PM

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Hi Alex,

Thought you might find find this interesting. It references the Brattle Group report, and other strategies, that would reduce the on shore environmental impact of all these cable projects.

Best,
Stacey Guenther

https://urldefense.com/v3/__https://www.wbur.org/news/2022/10/18/offshore-wind-transmission-lines-grid__;!!CUhgQOZqV7M!j1GWL3_KwYvt141_kX2I1r1hn1CDbJNFciwNoukCT_mSqSCMxX75UoNDbCxqmnyYWPhp8onFUuSML6M5PNTxWzYi2seZFODYJpU$