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CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS
ON THE
SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT REPORT

PROJECT NAME : Vineyard Wind Connector
PROJECT MUNICIPALITY : Barnstable, Yarmouth, State/Federal Waters
PROJECT WATERSHED : Cape & Islands
EEA NUMBER : 15787
PROJECT PROPONENT : Vineyard Wind
DATE NOTICED IN MONITOR : September 5, 2018

Pursuant to the Massachusetts Environmental Policy Act (MEPA; M.G. L. c. 30, ss. 61-62I) and Section 11.08 of the MEPA regulations (301 CMR 11.00), I have reviewed the Supplemental Draft Environmental Impact Report (SDEIR) and hereby determine that it **adequately and properly complies** with MEPA and its implementing regulations. The Proponent may file the Final Environmental Impact Report (FEIR) in accordance with the Scope provided in this Certificate.

The Vineyard Wind project is proposed in response to the clean energy mandate of Chapter 188 of the Acts of 2016 (An Act to Promote Energy Diversity) and associated Request for Proposals (RFP). The RFP was issued by energy distribution companies, in coordination with the Massachusetts Department of Energy Resources (DOER), to solicit long-term contracts to satisfy the policy directives encompassed within Section 83C of the Act and to assist the Commonwealth with meeting its Global Warming Solution Act (GWSA) goals. Subsequent to the filing of the Draft Environmental Impact Report (DEIR), Vineyard Wind was selected to advance to contract negotiations for 800 megawatts (MW) of wind energy. The Proponent filed executed Power Purchase Agreements (PPAs) with the Massachusetts Department of Public Utilities (DPU) on July 31, 2018.

Subsequent to the filing of the SDEIR, the Proponent indicated its decision to select the offshore cable route to Covell's Beach in Barnstable (previously identified Noticed Alternative) as its Preferred Route based on the execution of a Host Community Agreement (HCA) with the Town of Barnstable (October 3, 2018).¹ The offshore cable route to New Hampshire Avenue in Yarmouth (previously identified as the Preferred Route) is now identified as the Noticed Alternative route.

Project Description

The purpose of the Vineyard Wind project is to generate and distribute Offshore Wind Energy Generation² to Massachusetts in accordance with An Act to Promote Energy Diversity (the Act). The Act was promulgated as part of a strategy to meet the Commonwealth's Greenhouse Gas (GHG) reduction and energy goals. The project proposes to construct an offshore wind project located in the federally designated Wind Energy Area (WEA) which is under the jurisdiction of the Bureau of Ocean Energy Management (BOEM). The WEA is located in federal waters to the south of Martha's Vineyard. Vineyard Wind will deliver 800 MW of energy to the New England energy grid via submarine export cables that will make landfall in Massachusetts. The SDEIR indicates that the Vineyard Wind project would offset carbon dioxide (CO₂) emissions by approximately 1,680,000 tons per year (tpy).

For the purpose of MEPA review, the portion of Vineyard Wind subject to state jurisdiction is referred to as the Vineyard Wind Connector and the "Project". Major elements of Vineyard Wind include a wind turbine array including wind turbine generators (WTGs), offshore electrical service platforms (ESPs), offshore submarine transmission cables, onshore underground transmission cables, and an onshore substation. The SDEIR indicates that two offshore export cables will be installed in a 2,660-foot wide installation corridor to distribute the energy to the New England bulk power grid (a reduction from the three export cables proposed in the DEIR). The Project includes offshore transmission cables in state waters, onshore cables and a substation. The SDEIR describes the elimination of one of the two offshore cable corridors previously presented (Eastern Offshore Export Cable Corridor (Eastern cable corridor)). The Proponent will advance the Western Offshore Export Cable Corridor (Western cable corridor) which will make landfall at one of two potential sites in Massachusetts. The Western cable corridor includes variations that extend through Muskeget Channel to the west and the east. Approximately 20.9 to 23.3 miles of the transmission lines will be located in state waters depending on the selected route through Muskeget Channel and landfall site. Covell's Beach in Barnstable has been selected as the Preferred Route based on support from the Town of Barnstable, shorter cable length and associated reduction in impacts, and avoidance of crossing the existing National Grid Cape Cod to Nantucket Cable.

Each 10-inch diameter offshore export cable will be comprised of a three-core 220 kilovolt (kV) alternating current (AC) cable for power transmission bundled with a fiber optic cable. The cables are proposed to be buried approximately five to eight feet below the seafloor and laid with a combination of jet-plowing (through flat, soft sediments), jetting (through small sand waves), suction dredging (through large sand waves), and mechanical trenching (through compacted sand/gravel/cobble). Boulders will be

¹ Email to Purvi Patel, MEPA from Rachel Pachter, Vineyard Wind, on October 5, 2018.

² Chapter 188 of the Acts of 2016 defines Offshore Wind Energy Generation as offshore electric generating resources derived from wind that: (1) are Class I renewable energy generating sources, as defined in section 11F of Chapter 25A of the General Laws; (2) have a commercial operations date on or after January 1, 2018, that has been verified by DOER; and (3) operate in a designated WEA for which an initial federal lease was issued on a competitive basis after January 1, 2012.

relocated (except within dense areas which will be avoided) from the cable route and placed in another location within the construction corridor. Where burial is not possible due to subsurface conditions, it will be laid on the ocean floor and covered by rock or concrete mattresses. Within the transition zone between Nantucket Sound and land, Horizontal Directional Drilling (HDD) or open trenching will be used to install the cable.

The Preferred Route (5.4 miles long) for the onshore cable is located exclusively within Barnstable; the Noticed Alternative (6 miles long) extends from Yarmouth to Barnstable. The substation is proposed adjacent to the Eversource 115 kV Switching Station in Barnstable. The identification of Covell's Beach as the Preferred Route does not affect the on-shore variants of each route.

The SDEIR indicates that Vineyard Wind will include two 400-MW offshore cables (reduced from three offshore cables proposed in the DEIR). The Proponent plans to construct the full 800 MW sequentially (in a single phase), rather than being separated into two 400-MW phases (as previously described as a possibility in the DEIR). The two cables will be separated by approximately 330 feet within the 2,660-foot wide installation corridor.

Installation of each offshore cable from the Wind Development Area (WDA) to the landfall site will require approximately 24 days for simultaneous lay and bury (16 days for lay, six days for splice, two days for landfall connection) and approximately 37 days for the less weather-sensitive free lay and post lay burial technique (11 days for lay, six days for splice, 18 days for burial, two days for landfall connection). Preparatory or advance activities such as a grapnel run (to provide clearance for installation) and dredging of sand waves will occur two to four weeks prior to cable installation. The cable laying vessel and its guard vessels will follow a pre-identified route at a speed of less than one knot and will maintain a "moving" safety exclusion zone in consultation with U.S. Coast Guard (USCG) (approximately 0.6-mile radius).

The SDEIR indicates that the following changes to the project will reduce environmental impacts compared to those identified in the DEIR:

- Installation of 800 MW in a single phase, rather than two phases (400 MW each);
- Elimination of the Eastern cable corridor alternative;
- Elimination of one of the three offshore export cables and associated reduction in number of onshore cables (from nine to six);
- Reduction in the size of the duct bank to accommodate eight conduits instead of 12;
- Identification of rock placement as the preferred cable protection approach;
- Identification of a shorter HDD route at a more oblique angle to completely avoid areas of hard/complex bottom and eelgrass near Covell's Beach;
- Selection of Variant 1 (Attucks Lane and Independence Drive – entirely within existing roadway layouts) as the Preferred Route to the substation; and
- Advancement in substation design and redesign of the stormwater management system to accommodate additional containment volumes.

Project Area

The cable routes through Nantucket Sound include sections within the area of federal waters in the center of the sound. A portion of the cable route within state waters lies within the Cape and Islands Ocean Sanctuary (CIOS) and the Massachusetts Ocean Management Plan (OMP) planning area. The Western cable corridor to the preferred landing site passes through 20.9 miles and 22.6 miles of state waters using the western route and eastern route through Muskeget Channel, respectively. The Noticed Alternative would extend through 21.4 miles and 23.3 miles of state waters using the western route and eastern route through Muskeget Channel, respectively.

The substation is proposed within a 6.35-acre site that is zoned for industrial use. It is located on Independence Drive within the Independence Park commercial/industrial area. The majority of the site is wooded and includes some limited parking areas and a small building. The site is bordered to the north by the Barnstable Switching Station, to the west by the former Cape Cod Times building, to the south by Independence Drive, and to the east by a 150- to 200-foot wide electric transmission corridor. The surrounding area has been zoned, permitted and developed or is proposed to be developed with residential, commercial, and recreational uses. A residential neighborhood is located approximately 2,000 feet from the site. Onshore transmission lines are proposed primarily within paved roadways and other existing rights of way (ROW) in Yarmouth and Barnstable.

According to the Massachusetts Natural Heritage and Endangered Species Program (NHESP), portions of the project area are mapped as Priority and Estimated Habitat for rare species including Roseate Tern (*Sterna dougallii*)³, Common Tern (*Sterna hirundo*), Least Tern (*Sternula antillarum*), Water-willow Borer Moth (*Papaipema sulphurata*), Scarlet Bluet (*Enallagma pictum*), and Piping Plover (*Charadrius melodus*).⁴ North Atlantic 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) indicates that the cable routes will pass through 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 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).

Lewis Bay supports a variety of marine resources including winter flounder (*Pseudopleuronectes americanus*), horseshoe crabs, and shellfish. Sections of the Lewis Bay shoreline are mapped soft shell clam (*Mya arenaria*), American oyster (*Crassostrea virginica*), and quahog habitat. Oyster aquaculture grants are present along the eastern shoreline. Most of Lewis Bay is identified as bay scallop habitat and it supports a seasonal bay scallop fishery. Covell's Beach is mapped as a horseshoe crab nesting beach and waters offshore of the beach are mapped as surf clam habitat. Waters offshore of portions of

³ Species also federally protected pursuant to the U.S. Endangered Species Act (ESA, 50 CFR 17.11).

⁴ Ibid.

Covell's Beach and the entrance channel to Lewis Bay contain mapped eelgrass (*Zostera marina*) habitat. The 2018 marine surveys located an area of eelgrass offshore from Covell's Beach around Spindle Rock in Centerville Harbor.

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. A number of properties included in the Massachusetts Historical Commission (MHC) Inventory of Historic and Archaeological Assets of the Commonwealth (Inventory) and State and National Registers are located along the onshore segment of the transmission route. Both the Preferred Route and Noticed Alternative extend through and are adjacent to archaeological sites.

In addition, portions of the project area include land held in accordance with Article 97 of the Amendments of the Constitution of the Commonwealth (Article 97) and land permanently protected through a conservation restriction (CR).

Environmental Impacts and Mitigation

Potential environmental impacts⁵ of the project in Massachusetts include alteration of up to 8.3 acres of land, creation of up to 0.6 acres of impervious area, and alteration to wetland resource areas. Based on information in the SDEIR regarding the Preferred Alternative, the project will impact Land Under the Ocean (LUO), of which up to nine acres will be Land Containing Shellfish (LCS) based on DMF shellfish suitability maps, associated with installation of the submarine cable, dredging of sand waves, sediment dispersion and installation of the cofferdam at the end of the alternate landfall site. Installation of the land-based section of the transmission line for the Noticed Alternative will alter approximately 19,350 square feet (sf) of Land Subject to Coastal Storm Flowage (LSCSF) and 5,600 sf of Riverfront Area (RFA) and open-cut trenching at the alternate landfall site will alter approximately 1,500 sf of Coastal Beach. Installation of the land-based section of the transmission line for the Preferred Alternative will alter approximately 7,500 sf of LSCSF. The project will include up to approximately 104,000 cubic yards (cy) of dredging of sand waves within state waters and 164,000 cubic meters (m³) total from the WDA based on the Western cable corridor (west through Muskeget Channel).

The submarine cable will be installed using jetting, jet-plow, or mechanical trenching to minimize the area of dredging and direct seafloor impact. HDD will be used for the transition to landfall to avoid impacts to coastal wetland resource areas along the Preferred Route (Covell's Beach). Open trench and HDD have been considered for the Noticed Alternative. Areas of Coastal Beach, RFA, and LSCSF impacted during construction will be restored. The project will be required to comply with management standards in the OMP to minimize impacts to marine resources. Best management practices (BMPs) will be employed during the construction period. The substation will include full containment for any components containing dielectric fluids including transformers and capacitor banks.

The project will offset 1.68 million tpy of GHG emissions and improve the resiliency of energy infrastructure.

⁵ Certain impacts identified in the SDEIR are associated with the Vineyard Wind Connector only, while others are associated with elements of the project under state and federal jurisdiction.

Permits and Jurisdiction

The Project is subject to a Mandatory EIR because it requires Agency Action and it will alter ten or more acres of other wetlands (LUO) pursuant to 301 CMR 11.03(3)(a)(1)(b) of the MEPA regulations. The project also exceeds ENF thresholds at 301 CMR 11.03(3)(b)(3) for dredging of 10,000 or more cubic yards (cy) of material and at 301 CMR 11.03(7)(b)(4) for construction of electric transmission lines with a capacity of 69 or more kV that are over one mile in length. The Project may exceed the ENF threshold at 301 CMR 11.03(2)(b)(2) for disturbance of greater than two acres of designated priority habitat that results in a take of a state-listed rare species. Depending on the on-shore transmission route selected, the Project may also exceed ENF thresholds at 301 CMR 11.03(1)(b)(3) for conversion of land held for natural resources purposes in accordance with Article 97 to any purpose not in accordance with Article 97; and 301 CMR 11.03(1)(b)(5) for release of an interest in land held for conservation purposes.

The Project will require a Section 401 Water Quality Certification (WQC), a Chapter 91 (c. 91) License, and Approval of Easement pursuant to 310 CMR 22.00 from the Massachusetts Department of Environmental Protection (MassDEP); review under the Massachusetts Endangered Species Act (MESA) by NHESP; review under the OMP and Ocean Sanctuaries Act; a Non-Vehicular Access Permit, Road Crossing Permits, and a Rail Division Use and Occupancy License from the Massachusetts Department of Transportation (MassDOT); and Approval under MGL Chapter 164 Sections 69J and 72, and Chapter 40A Section 3 Zoning Exemption from the Energy Facility Siting Board (EFSB) and DPU. The Project also requires a Federal Consistency review by the Massachusetts Office of Coastal Zone Management (CZM). The Project is subject to the MEPA GHG Emissions Policy and Protocol (the Policy). It may require authorization from the State Legislature in accordance with Article 97.

Consistent with the request for proposals issued pursuant to Section 83 of Chapter 169 of the Acts of 2008 (An Act Relative to Green Communities), as amended by Chapter 188 of the Acts of 2016, the distribution companies must submit any long-term contract proposed to the DPU for review and approval.

The Project will require Orders of Conditions from Conservation Commissions in Edgartown, Yarmouth, and Barnstable, and potentially, Nantucket and Mashpee (or in the case of an appeal, Superseding Orders of Conditions from MassDEP).

Vineyard Wind and elements of the Vineyard Wind Connector require approvals from BOEM⁶; an Individual Permit from the U.S. Army Corps of Engineers (ACOE) under Section 404 of the Clean Water Act (CWA) and Section 10 of the Rivers and Harbors Act (RHA); review from the U.S. National Marine Fisheries Service (NMFS), USCG, and Federal Aviation Administration (FAA); consultation with and Field Investigation Permits from MHC in accordance with Section 106 of the National Historic Preservation Act (NHPA) of 1966 and M.G.L. Chapter 9, Sections 26-27C; a Special Use Permit from BUAR; Development of Regional Impact (DRI) review from the Cape Cod Commission (CCC) and

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).

Martha's Vineyard Commission (MVC); 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 Agency Actions that are likely, directly or indirectly, to cause Damage to the Environment. The subject matter of the EFSB/DPU approvals and the c. 91 License are sufficiently broad such that 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 SDEIR

The SDEIR provides an updated description of baseline environmental conditions informed by surveys and impacts associated with proposed Project elements within State jurisdiction. It describes several methodologies for installation of offshore export cables. Baseline conditions for Project elements located in federal waters are available in the Construction and Operations Plan (COP) found on the BOEM website. The SDEIR provides a general project schedule. It describes applicable time-of-year (TOY) restrictions, some of which conflict for various resources, and indicates that consultation with state and federal agencies regarding construction scheduling and potential TOY restrictions for offshore elements is ongoing.

The SDEIR identifies the Proponent's extensive consultation with federal, state and local agencies and officials and to stakeholders and the public. Comments from MassDEP, DMF and CZM indicate that the SDEIR is generally responsive to the Scope. It describes changes to the project since the filing of the DEIR and provides additional information to support the alternatives analysis.

The SDEIR contains additional data and analyses, including preliminary results from the 2018 marine surveys as well as an updated and expanded sediment dispersion modeling study that includes cable installation activities and dredging of sand waves. These surveys provide data to delineate site conditions, evaluate impacts associated with cable routes and support micro-siting of cables within the corridor; provide information regarding sensitive environmental resources for avoidance, minimization and/or mitigation of impacts; and inform the proposed cable design, burial techniques and cable protection.

The 2018 marine survey includes data collection along multiple lines within the 2,660-foot wide installation corridor, including the two options through Muskeget Channel (west and east) and the Preferred Route and Noticed Alternative landfall sites. Based on the results of the survey, the Proponent has eliminated the Eastern cable corridor. The Proponent determined that it would impact a larger proportion of complex bottom which would require additional dredging of sand waves. The survey data will supplement the OMP-mapped "special, sensitive or unique resources" (SSU).

The SDEIR indicates that the Western cable corridor was selected as the preferred route for the offshore export cable based on marine surveys which confirm that it is technically feasible and that it will avoid and minimize potential impacts compared to the Eastern cable corridor.

The SDEIR includes updated site plans and graphics (Attachment A); new plans reflecting marine surveys and OMP-mapped resources (Attachment C); and engineering plans (landfall and onshore duct bank) for the Preferred Route and the Noticed Alternative (Attachments I and H, respectively). The SDEIR includes an updated list of State, federal and local permitting and review requirements and provides an update on the status of each of these pending actions. It includes an assessment of the Project's consistency with the OMP, c. 91 regulations (310 CMR 9.00) and 401 WQC regulations (314 CMR 9.00).

The SDEIR provides draft Section 61 Findings and describes measures to mitigate environmental impacts. The SDEIR includes a draft Benthic Habitat Monitoring Plan (Attachment D) that will guide post-construction monitoring to document habitat disturbance and recovery. The Proponent indicates it will consult with NHESP, DMF, research and other organizations, and interested stakeholders to identify parameters that will be monitored, methodology and frequency of monitoring, development of monitoring reports and distribution of monitoring reports.

Federal Consistency

CZM review will extend to the entire Vineyard Wind project. The SDEIR includes the Federal Consistency Statement submitted to CZM (Attachment O). The SDEIR was required to provide context and information regarding cumulative impacts of the entire project to support meaningful review and, in particular, to support Federal Consistency Review by CZM. As previously mentioned, the SDEIR includes a brief description of the activities proposed in federal waters and references the COP for additional information on elements outside State jurisdiction. The SDEIR focuses on impacts within State jurisdiction and provides an impact analysis for LUO associated with certain activities within federal waters such as dredging.

Ocean Management Plan

The project is subject to review under the Massachusetts OMP.⁷ The OMP identifies and maps important ecological resources that are key components of the State's estuarine and marine ecosystems - defined as SSUs - and identifies key areas of water-dependent uses including commercial and recreational fishing and navigation. It 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, areas of hard/complex seafloor, intertidal flats, and eelgrass. SSU resources potentially impacted by the Project are primarily areas of hard/complex seafloor. Eelgrass and North Atlantic Right Whale core habitat will be avoided. OMP maps also depict areas of Sea duck core habitat, Concentrated Recreational Fishing, Concentrated Commerce Traffic, Concentrated Commercial Fishing Traffic and Concentrated Recreational Boating.

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 (LEDPA) than a project located within a mapped SSU resource. The OMP management standards require a demonstration that new, site-specific information provides more accurate delineation of the resource areas, that no other LEDPA exists, that the project has undertaken

⁷ The OMP was developed pursuant to the Oceans Act (Chapter 114 of the Acts of 2008) in 2009 and was updated in 2015.

all practicable measures to avoid damage to SSU resources, that there will be no significant alteration of SSU resource values or interests, and that the public benefits of the project outweigh the public detriments posed by impacts to SSU resources. The SDEIR provides additional analysis to supplement information in the DEIR. It provides a discussion of the Project's consistency with the management standards of the OMP 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 environmental impacts of the project and mitigation measures, and addressing its public benefits.

Available data and recent surveys are used to demonstrate that cable route alternatives generally avoid sensitive resources identified in the OMP and minimize potential impacts to those resources. The SDEIR includes revised maps that update benthic conditions and identify the extent of hard/complex seafloor and eelgrass along the cable route in higher resolution than mapped in the OMP. The SDEIR separately delineates hard bottom and complex seafloor (sand waves). The 2018 survey data was used to establish boundaries of hard/complex bottom habitat areas and eelgrass to determine impacts to SSUs and to provide a comparison to post-construction conditions. The proposed cable route will be sited to avoid hard seafloor to the maximum extent practicable; however, the SDEIR indicates that the amount of hard bottom (areas of cobble and biogenic habitat) that cannot be avoided and may be impacted during the cable laying process is not fully known. New areas of eelgrass uncovered around Spindle Rock will be avoided by realigning the cable corridor at an angle as it approaches the Covell's Beach land site.

The OMP includes mapped areas of commercial and recreational fishing and navigation in Nantucket Sound that could be affected by the project. Proponents must avoid, minimize, and mitigate impacts to areas of concentrations of water dependent uses identified in the OMP pursuant to 301 CMR 28.04(3). The SDEIR evaluates potential conflicts to navigation as vessels transit between ports and the offshore wind lease area and evaluate establishment of transit corridors to provide safe passage. The SDEIR provides additional information to describe how cable installation could affect fishing, including restrictions on navigation, on fishing and on the placement of fixed or mobile fishing gear.

The SDEIR describes measures to minimize impacts to recreational/commercial fishing activities and navigation including employing a Marine Coordinator during the construction and installation phase to manage all construction vessel logistics; liaise with USCG, port authorities, and others; and coordinate with fisherman and other mariners in advance of cable laying (by providing notices to mariners to minimize conflicts between construction and recreational/commercial vessels); maintaining a 1,640-foot safety zone around all construction activities; establishing a vessel traffic management plan; and coordinating with local pilots during construction. The SDEIR includes an updated Fisheries Communications Plan (FCP) (Attachment G) for alerting mariners of the location and timing of activities in Nantucket Sound. The Proponent will prioritize burying cables to a sufficient depth within the seabed to avoid and minimize the use of cable protection measures which could impact fishing activities post-construction. The Proponent is developing a framework for a pre- and post-construction fisheries monitoring program to measure the Project's effect on fisheries resources in consultation with the University of Massachusetts Dartmouth School for Marine Science and Technology (SMAST) and local stakeholders. The duration of monitoring will be determined as part of the initial effort to determine the scope of the study, but it is anticipated to include the pre-construction period and at least one year of post-construction monitoring.

The Proponent will continue to actively consult with DMF, the Massachusetts Lobstermen's Association (MLA), New England Fisheries Management Council (NEFMC), and a number of other fisheries groups and individuals to consider design and construction measures to minimize interference with fishing activity and impacts to fish habitat.

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 impacts to ocean resources and the broad public interests and rights in the lands, waters and resources of the OMP areas. If the Project is permitted, the fee must be deposited in the Oceans and Waterways Trust. The fee will be established through MEPA review. The guidance and fee structure contained in the OMP, the information and analysis contained in the SDEIR and FEIR and consultation with agencies will inform the determination of the fee.

The SDEIR proposes a fee based on the project's footprint and taking into consideration public benefits and the \$15 million Offshore Wind Accelerator Program. The Proponent asserts that the Project should be classified within the Class II category and proposes a fee of \$240,000 based on 27 acres of permanent cover on the seafloor associated with cable protection along the two export cables.

Based on the full extent of impacts identified in the SDEIR, the Project would be more appropriately classified as a Class III category. These impacts include: direct cable laying and dredging area, dredged disposal area, sediment deposition area, and impacts to biota and habitat, and permanent hard cover. The SDEIR estimates that impacts associated with cable installation in state waters could temporarily alter up to 94 acres of seafloor; permanently alter 27 acres of seafloor (hard cable protection); fluidize up to 138,000 m³ of sediment resulting in up to 200 acres covered in over 1 millimeter (mm) of sediment; and dredge 104,000 m³ of sand waves. As noted by CZM, it is possible that some of these impacts may be underestimated. In addition, project changes and/or provision of additional data and analysis in the FEIR could result in reductions in identified impacts. The Proponent should engage in further discussions with the MEPA Office and CZM to estimate the Ocean Development Mitigation Fee for the FEIR.

The SDEIR provides additional information regarding the \$15 million Offshore Wind Accelerator Program and its three major components: \$10 million Offshore Wind Energy Industry Accelerator Fund; \$2 million WindWard Workforce program; and \$3 million for the Innovations for Marine Mammal Protection program.

Alternatives Analysis

The DEIR included an alternatives analysis for offshore and onshore routing, landfall sites, substation sites, and construction methodology and identified criteria employed to evaluate alternatives. The proposed reduction in the number of cables from three to two will avoid and minimize environmental impacts. The SDEIR indicates that the Proponent considered sequential and simultaneous installation of the two export cables. The Proponent selected sequential installation because simultaneous installation would require two separate vessels which would increase expenses and create logistical challenges.

The SDEIR asserts that the complex nature of the project necessitates that interrelated elements (offshore route, landfall site, onshore route, substation site, and interconnection location) must be independently feasible and also work as a unified system to meet the project purpose. The Proponent has indicated its interest in retaining flexibility to advance the project through a “permitting envelope” approach. The SDEIR outlines the importance of providing flexibility in maintaining: a 2,660-foot wide installation corridor; eastern and western route options through Muskeget Channel; two landfall sites; two options for transitioning from offshore to onshore cables at New Hampshire Avenue; comparable onshore routing variants; possible cable installation techniques; and options for cable burial and cable protection.

The MEPA Regulations include provisions to support flexibility of review and changes to projects over time, including the ability to advance more than one alternative to permitting. This provision requires that the environmental impacts of alternatives have been adequately reviewed and that the alternatives are similar in terms of environmental impact. Specifically, the regulations at 301 CMR 11.10 (1) indicate that *“The selection by the Proponent or the imposition as a condition or restriction in a Permit or other relevant review document allowing or approving an Agency Action of any alternative that similarly avoids, minimizes or mitigates potential environmental impacts shall not constitute a change in the Project, provided that the alternative was previously reviewed in an EIR.”*

The Proponent identifies the Preferred Alternative and alternatives that the Proponent will continue to evaluate. The SDEIR advances analysis of a single offshore submarine transmission route (Western cable corridor and associated western and eastern routes through Muskeget Channel) including two landfall sites, and two onshore transmission routes (Preferred Route and Noticed Alternative) including onshore variants. The SDEIR indicates that the Eastern cable corridor was eliminated because of its slightly longer length and comparable environmental characteristics (although it exhibited larger sand waves). The SDEIR describes and compares the offshore routing from the WDA to the landfall sites (along both routes through Muskeget Channel). The SDEIR describes how selection of the Preferred Route and Noticed Alternative avoid or minimize impacts to resources and uses.

In considering alternative geographic routes, the Proponent delineated a Study Area that included all of southeastern Massachusetts and eastern Rhode Island. The SDEIR provides additional analysis of the West Barnstable, Brayton Point and Pine Street Substations to justify selection of the Barnstable Switching Station as the preferred interconnection point.

The project includes high-voltage alternating current (HVAC) technology based on its flexibility, reliability and reduced costs. The Proponent indicates that HVAC technology will support expansion of transmission cables and substation capacity and avoids costs associated with converter stations necessary at both cable termini. The maximum cable length from the federal lease area to the interconnection point could not exceed 62 miles without requiring an expensive mid-way reactor station.

The SDEIR maintains that both offshore routes are feasible, avoid core habitat mapped for whales, avoid mapped eelgrass habitat, and minimize impacts to mapped SSU areas. It asserts that the routes have generally equivalent impacts.

Offshore installation of the two cables for the majority of the route is anticipated to use simultaneous lay-and-bury via jet plow. The SDEIR indicates that other methods may be required in areas of hard bottom or other challenging conditions and provides information regarding cable

installation methods. Target burial depth will be approximately five to eight feet below stable seabed. Jet-plowing, plowing, and/or mechanical trenching will create a trench that is up to 3.3 feet wide. Where subsurface conditions prevent burial of the cable it will be placed on the seafloor and covered with protective material. The SDEIR describes potential impacts from offshore cable installation associated with the 3.3-foot-wide trench (direct), 6.6-foot-wide corridor for the cable installation tool which will move along the seafloor on skids or tracks (temporary), sediment dispersion and deposition, dredging through sand waves, anchoring, and cable protection. The SDEIR does not identify where certain installation methods will be used. The SDEIR claims that the selected installation method will not involve significant sidecasting of sediment.

HDD is proposed at the Covell's Beach landfall site to avoid impacts to sensitive resources and recreation. Open trench installation is proposed at the New Hampshire Avenue landfall site; however, the SDEIR includes analysis of both methodologies and compares impacts. HDD is proposed at Covell's Beach to avoid impacts to the rare species habitat, nearshore area, tidal zone, beach, and coastal dunes. Open-trench is identified as the preferred method for the Noticed Alternative because cable burial depth would be three to five times greater using HDD and deeper burial depths cause a cable to operate at a higher temperature (open trench would result in a better cable rating); shorter construction timeline; and lower costs. The SDEIR outlines a contingency plan describing measures that will be undertaken to minimize and contain turbidity, sedimentation and release of drilling slurry during the drilling or trenching process.

Wetlands and Water Quality

Vineyard Wind includes work within wetland resource areas and activities that trigger Federal, State and local wetland permitting jurisdiction, each with its own performance standards and regulations. The Conservation Commissions of Yarmouth, Barnstable, and Edgartown and potentially Nantucket and Mashpee will review the project to determine its consistency with the Wetlands Protection Act (WPA), the Wetlands Regulations (310 CMR 10.00), and associated performance standards, including the stormwater management standards (SMS). MassDEP will also review the Project to determine its consistency with the 401 WQC (314 CMR 9.00) and c. 91 regulations (310 CMR 9.00). Finally, ACOE review will determine its consistency with Section 404 of the Federal CWA and Section 10 of the RHA.

The SDEIR describes impacts to onshore and offshore resource areas in Massachusetts including certain impacts within federal waters (discussion of seafloor impacts and dredging).⁸ The SDEIR describes the methodology and assumptions for quantifying impacts from cable installation on LUO.

Maximum area of seafloor (LUO) impacts associated with installation of two cables are updated and summarized in the following table (Tables 1-4 and 1-5 of the SDEIR summarize individual impacts to LUO from cable installation along each cable route).

⁸ Certain impacts were disaggregated into those under MEPA jurisdiction and those under federal jurisdiction.

Project Activity	State Waters	Total (State and Federal Waters)
Trench impact zone (acres)*	19	35
Disturbance zone from tool skids/tracks (acres)**	37	70
Length of sand wave dredging (miles)	2.2	3.8
Volume of sand wave dredging (nearest 1,000 m ³)	104,000	164,000
Volume of sediment fluidized in trench (nearest 1,000 m ³)	138,000	259,000
Dredging of sand waves (acres)***	39	68
Sediment deposition greater than 1 mm from dredging operations (acres)	200	329
Sediment deposition greater than 20 mm from dredging operations (acres)	22	36
Anchoring (acres)****	3.7	6.9
Cable Protection*****	27	27

* based on 3.3-foot-wide trench (the DEIR indicated a 6-foot wide trench)
 ** based on a 6.6-foot-wide disturbance zone (the DEIR indicated a 20-foot wide trench)
 ***65-foot-wide centered on cable less the 6.6-foot wide jet plow and 3.3-foot wide trench impacts
 **** Estimate based on half the length of the longest offshore corridor route
 ***** Up to 3.7 miles includes federal waters in Nantucket Sound

The SDEIR indicates that the Proponent will maintain both options through Muskeget Channel to provide flexibility in design and installation. The SDEIR compares both routes through Muskeget Channel to each of the landfall sites.

The majority of the export cable is expected to be installed using simultaneous lay and bury via jet plowing (fluidizing the sediment within the trench and allowing the cable to sink under its own weight to the appropriate depth or be placed at depth by the tool) or other typical techniques such as mechanical plowing and mechanical trenching. Dredging techniques will have differing impacts on seafloor disturbance and sedimentation. Comments from CZM concur that simultaneous cable laying and burial in soft sediments (as opposed to trenching and laying the cable at a later time) is the preferred method for minimizing impacts. Depending on which cable installation tool is selected, trench disturbance is expected to be up to approximately 3.3 feet wide. The tool is expected to move along the seafloor on skids or tracks which will slide over the surface of the seafloor (along an area 3.3 to 6.6 feet wide) and may disturb benthic habitat. While the Proponent will prioritize the least environmentally impactful cable installation alternatives practicable for each segment of cable installation, the SDEIR indicates that the exact methods and equipment for dredging sand waves and offshore cable installation will be developed through the contractor evaluation and selection process. Assessment of measures to avoid and minimize certain resource areas is ongoing based on consultation with resource agencies, final processing and analyzing of survey data, and refinements to cable laying methods.

Dynamic positioning vessels will be used for cable installation. Shallow water and strong currents may preclude its use in some areas, particularly within Muskeget Channel and potentially within Lewis Bay. Where it is precluded, anchoring will be necessary. Anchoring impacts would be associated with disturbance of the substrate resulting in localized mortality of infauna and anchor sweeps across the seafloor. Anchored vessels must avoid eelgrass and will avoid other SSU habitats to the greatest extent practicable. The SDEIR indicates that mid-line anchor buoys, where feasible and

safe, will be used. With the exception of Muskeget Channel and Lewis Bay (up to 3,300 feet), anchoring will be contained within the installation corridor.

The SDEIR estimates that cable burial may not be achievable for up to 3.7 miles of the corridor (including at the crossing of the existing Nantucket cable required if the New Hampshire Avenue landing site were used). The Proponent indicates that it will reattempt burial before armoring. Hand-jetting may be used in very limited instances. Where armoring cannot be avoided, the SDEIR describes alternative cable protection methods including rock placement along relatively larger areas, concrete mattresses within limited areas, and protective cable shells (Urduct/half-shell or similar). The SDEIR does not propose specific mitigation measures to offset conversion of benthic habitat.

The SDEIR was required to use field data and hydrodynamic modeling to characterize the wave dynamics, currents, and sediment transport along the proposed cable route, particularly in areas of sand waves, to better understand whether the proposed depth of burial is sufficient to avoid the potential use of armoring. After the initial survey, the Proponent will survey the cable's burial depth annually for the first three years after construction, every three years for the next 12 years, and every five years beyond that. Sections of cable that are inadequately buried will be buried again using a secondary burial tool.

The SDEIR estimates discontinuous sand wave dredging along up to 2.2 miles with a corresponding volume of dredging up to 104,000 m³ in state waters. Where dredging is required to remove the upper portions of the sand waves above the stable seabed, the Proponent is considering the use of jetting and trailing suction hopper dredge (TSHD). Jetting uses a pressurized stream of water to push sand to the side and is distinct from jet-plowing, which is the preferred approach for cable burial. TSHD involves using suction to remove material from the seafloor, depositing in the vessel hopper, releasing dredged material within the surveyed installation corridor in a comparable area characterized by sand waves, and laying the cable at a later time. The SDEIR does not identify locations for deposition nor does it quantify associated impacts to the benthic environment. Dredged corridors through sand waves would be approximately 65 feet wide at the bottom with 1:4 side slopes.

The SDEIR includes a revised sediment dispersion modeling study of offshore cable installation activities (Attachment F) and provides a discussion of the results. Two approaches were modeled: TSHD Pre Dredge and Limited TSHD Pre Dredge including Jetting. Modeling of sand wave dredging using TSHD indicated that total suspended solids (TSS) concentrations above 10 milligrams per liter (mg/L) extended up to 10 miles from the cable trench centerline. TSS concentrations greater than 1,000 mg/l is predicted up to three miles away during hopper overflow and dumping. Modeling indicates greater impacts are associated with TSHD than jetting or jet-plowing. The SDEIR asserts that increased turbidity and possible siltation during cable installation will be minor and of short duration and acknowledges that resettlement of sediment may cause mortality of benthic fauna particularly sessile and attached organisms proximate to the route. In addition, dredging of sand waves will directly impact organisms within and adjacent to the dredge footprint.

The two offshore export cables would transition to up to six onshore transmission cables. The Preferred Route and Noticed Alternative include variants for the underground duct bank routes to the substation. Routes are generally similar in length and both routes and variants are considered viable.

The Proponent will locate synchronous condensers within the existing building (the former Cape Cod Times building) just west of the substation site to reduce potential visual and noise impacts and

avoid construction of a separate enclosure. The substation will be equipped with full containment (110 percent) for any components containing dielectric fluids plus an incremental volume sufficient to account for a simultaneous 100-year, 24-hour rainfall event (9 inches of rain). The substation stormwater design has been updated to reflect this change and includes a revised Stormwater Management Report (Attachment N). The onshore segment of the Project is proposed within or proximate to the Zone I and Zone II of public water supplies, which are considered Critical Areas. The stormwater management design at the substation site will meet or exceed the Massachusetts Stormwater Policy recommendations for this Project, and will comply with the MassDEP Stormwater Standard 6 for Critical Areas. The site design will also comply with Barnstable source water protection ordinances, bylaws, and regulations.

Waterways

The submarine cable will be located within flowed tidelands of Nantucket Sound and Lewis Bay and will be subject to licensing under c. 91 and the Waterways Regulations. The SDEIR discusses the Project's consistency with the applicable c. 91 regulations. The SDEIR provides additional information to evaluate the impacts of dredging.

As a facility generating electricity from wind power which requires an EIR pursuant to 310 CMR 9.12(2)(e), MassDEP shall find the project to be water-dependent based on a comprehensive alternatives analysis demonstrating that the facility requires direct access to or location in tidal waters and cannot reasonably be located or operated away from tidal waters. For projects subject to an EIR, the alternatives analysis must be provided during MEPA review so that I may make a finding regarding water-dependency. The SDEIR includes information intended to document that the project is a water-dependent facility in accordance with the Waterways Regulations (310 CMR 9.00) and describes why the project cannot be reasonably located away from tidal waters.

The SDEIR addresses potential impacts of armoring of the cable on commercial fishing operations. The analysis of the Noticed Alternative identifies how crossing of the NSTAR Yarmouth to Nantucket Cable would be addressed and describes how cable installation would be designed and installed to avoid, minimize and mitigate constraints on municipal projects including potential dredging use of helical anchors within Lewis Bay.

The SDEIR assesses the impacts of the installation, operations and maintenance of the cables on commercial and recreational fishing and navigation. It identifies how potential impacts will be avoided and minimized. It indicates that the planned burial depth of the offshore cables will allow continued use of mobile fishing gear. The SDEIR indicates the Proponent will select and design protection to minimize impacts to fishing and other gear and to avoid impacts to navigation.

Rare Species, Wildlife, and Marine Resources

The cable routes extend through diverse marine environments within the Outer Continental Shelf, Nantucket Sound, and the CIOS. As noted by the NHESP, CZM, and DMF, the area includes habitat and prey species important for rare species, including several state- and federally-listed terns (Roseate, Common, and Least), Piping Plover, as well as shellfish and finfish species that are important to the commercial and recreational fishing industries. The critically endangered North Atlantic Right Whales transit through this area and have been observed in areas outside of the Core Habitat SSU. The

SDEIR describes the size of vessels, the frequency and time of year of trips, and speed restrictions that will be observed. The SDEIR describes measures to avoid and minimize impacts to whales, turtles, and seabirds during construction. The Proponent will use acoustic monitoring during construction to protect whales and other marine species. Passive acoustic monitoring (PAM) will be used during pile driving activities within federal waters.

Comments from the Conservation Law Foundation (CLF), Natural Resources Defense Council (NRDC), National Wildlife Federation (NWF), Mass Audubon, and Sierra Club note that North Atlantic Right Whales have been observed in areas outside of the SSU in State and federal waters and recommend additional mitigation to avoid, minimize and mitigate impacts to whales.

The SDEIR identifies measures to avoid eelgrass and horseshoe crab spawning off of Covell's Beach. The landfall location at Covell's Beach intersects mapped habitat for Piping Plover. Based on recommendation from NHESP, the SDEIR commits to begin HDD in advance of April 1 or after August 31 to minimize noise impacts to this species during the breeding season. Discussions with resource agencies to determine appropriate TOY restrictions for construction to avoid impacts to Piping Plovers (work prohibited from April 1 – August 31), bay scallops, whelks, squid eggs, and diving/plunging birds are ongoing. The Proponent indicates that installation of export cables may be sequenced to begin in the nearshore in one year ending with burial of the partial cable segments followed by splicing and laying of the remaining cable lengths in the offshore portion in the following year. The SDEIR identifies an ideal weather window for cable installation from April through September. For simultaneous lay and burial, cables would be installed in May and June, with shoreward work completed in April. For free lay and burial, cables would be installed in late March and late May, with shoreward work completed in April.

The SDEIR includes an updated draft of the Benthic Habitat Monitoring Plan, which incorporates the sand lance, and is intended to document habitat and benthic community disturbance and recovery associated with project construction and installation within areas of the WDA and in the selected offshore cable corridor. The Proponent will continue consultation with NHESP on the specifics of this plan with respect to the Sand Lance. The benthic survey is proposed to begin in 2019 or 2020. The plan will focus on seafloor habitat and benthic community to measure potential impacts and the recovery of these resources comparable to controls outside the areas of construction activity. The plan outlines the schedule for conducting pre-construction (baseline) and post-construction surveys; parameters that will be monitored; employing a benthic ecologist; content of monitoring reports; site locations and survey/sampling configurations; and monitoring methodologies.

The SDEIR includes a revised Electric and Magnetic Field (EMF) assessment (Attachment J). Magnetic field (MF) modeling for both the offshore and onshore cables was performed for 800 MW of output. MF impacts were modeled at the seafloor at two burial depths (one and two meters). Results indicate that the highest modeled MFs for the submarine cross sections would occur directly above the 400 MW cable at the one-meter burial depth. Modeled MFs fall rapidly with lateral distance from the buried cable and results suggest MF associated with buried, subsea cables is very low and would not interfere with the navigational sense of marine organisms. The SDEIR concludes that the electrical energy from cables will not be detected by marine organisms.

Fisheries Resources

The SDEIR addresses comments from DMF and CZM regarding potential impacts to fisheries and other marine resources and measures to avoid, minimize, and mitigate these impacts along the length of the cable corridor and within the project area. Consideration of TOY restrictions is ongoing in consultation with resource agencies.

The SDEIR characterizes fish and fisheries resources in the Project area and their value. Commercial fishing resources include maps of fishing activity based on Vessel Monitoring System (VMS), Vessel Trip Reports (VTRs), and landings databases maintained by the Northeast Regional Ocean Council (NROC) and the Mid-Atlantic Council on the Ocean (MARCO). The SDEIR includes a discussion of the potential impacts of the cable installation process, and an estimate of predicted recovery time for affected resources. The SDEIR includes revised sediment dispersion modeling for jet-plowing using two soil deposition thresholds: a deposition thickness of 1 mm (sensitivity threshold for demersal eggs based on findings related to Winter Flounder and a deposition thickness of 20 mm (sensitivity threshold for shellfish). Modeling results indicate that the predicted extent of sediment deposition that might impact Winter Flounder eggs (deposition greater than 1 mm) is limited to within 330 feet of the cable trench and dissipated within four to six hours following disturbance. Recolonization and recovery to pre-construction levels is expected given the similarity of nearby habitat and species.

Traffic and Transportation

The Project requires a Non-Vehicular Access Permit, Road Crossing Permits, and a Rail Division Use and Occupancy License from MassDOT. All onshore export cables will be buried within concrete duct banks, primarily within paved public roadway layouts with some shorter stretches in existing utility transmission ROW, a MassDOT-owned railroad ROW, and potentially along the bike path corridor proposed by MassDOT (Variant 3). The majority of these roads are maintained by the Towns of Yarmouth or Barnstable; the Preferred Route, Variant 1 (Independence Drive), is located exclusively within Barnstable and almost entirely within roadway ROWs.

Traffic impacts are limited to the construction period. The Proponent will continue to work closely with the municipalities and MassDOT to develop Traffic Management Plans (TMPs) to evaluate construction-related traffic impacts, maintain safe and efficient access for all modes of travel in the vicinity of the ROW, and propose mitigation including night work, signage, and similar measures. The SDEIR provides an outline of the revised draft TMP and describes potential construction sequencing and traffic impacts. The TMPs will be submitted for review and approval by the municipalities. The TMPs will be adapted and revised to address unanticipated changes in construction prior to implementation of construction changes. The Proponent will provide funding to municipalities to hire a construction monitor to evaluate compliance with TMPs and coordinate with municipalities and residents regarding concerns during construction. The TMPs will serve as Temporary Traffic Control Plans (TTCP) consistent with Federal Highway Administration (FHWA) and MassDOT guidelines.

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. The project area includes a high density of shipwrecks and may include submerged ancient Native American cultural resources. The Project route contains numerous historic and archaeological resources which are either listed in the State and/or National Register of Historic Places, Inventory, or within local historic districts. The Project will require review from MHC pursuant to the Programmatic Agreement with BOEM as part of Section 106 of the NHPA. BUAR issued a Special Use Permit on September 28, 2017 for a marine archaeological reconnaissance survey in Barnstable, Martha's Vineyard, Nantucket, and Yarmouth. Activities allowed under this permit include archaeological reconnaissance and remote sensing, video documentation, benthic grab sample collection, and vibracore sampling in the permit area. MHC issued an archaeological permit to conduct a terrestrial archaeological reconnaissance survey for the onshore segment of the project.

The marine surveys were developed with BUAR, CZM and DMF to address data collection, including systematic sub-bottom coring and collection of geophysical data. The Proponent will provide upland and marine survey results to BUAR, MHC, CZM, and DMF. The SDEIR provides an update on consultations with MHC. The Proponent will coordinate directly with MHC regarding the need for additional field surveys and, to the extent necessary, will develop impact avoidance and mitigation plans. Potential impacts to archaeological resources will be addressed with MHC through Section 106 and the State Register Review processes.

The Proponent submitted a hardcopy of the draft COP to MHC and will provide an updated version of the COP after BOEM completes its sufficiency review, which includes draft archaeological reports for the terrestrial and marine aspects of the Project. The Proponent also submitted a draft terrestrial archaeological reconnaissance report MHC for its review. The COP will provide additional information about the scope of the wind array in federal waters and Areas of Potential Effect (APE) as determined by BOEM through its review under Section 106. The SDEIR indicates that cables and substation will not result in an adverse visual impact to historic properties and that construction and operation will not affect any historic buildings or structures.

The SDEIR indicates that the survey identified limited areas of archaeological sensitivity. The Proponent will avoid, minimize and/or mitigate impacts to archaeological resources during the final route selection. The SDEIR outlines the steps taken to limit adverse effects to submerged cultural resources in an inadvertent find protocol developed in accordance with BUAR's *Policy Guidance for the Discovery of Unanticipated Archaeological Resources*.

Port Facilities

The Proponent has signed a letter of intent with the Massachusetts Clean Energy Center (MassCEC) to use the New Bedford Marine Commerce Terminal for construction staging. The 26-acre facility is located on the New Bedford's industrial waterfront and was built to support offshore wind energy projects. The terminal is located within the ACOE hurricane barrier, has access to interstate highways and is located within a Designated Port Authority (DPA). The facility will be used to offload, prepare, and load components onto barges/vessels for delivery to the wind turbine array area for installation. It may also be used to fabricate and fit up components.

The Proponent may stage activities from other port facilities in the North Atlantic including Brayton Point and/or Montaup in Somerset; Providence, Rhode Island; Davisville, Rhode Island; and/or

New London and Bridgeport in Connecticut. The Proponent will use port facilities in Vineyard Haven and the New Bedford Marine Commerce Terminal during the operations and maintenance phase. The SDEIR indicates environmental review and permitting of port improvements will be addressed by the owners of those facilities.

The SDEIR describes potential conflicts with project-related vessels transiting to the WDA and other vessels along the route will be avoided and minimized. During the construction and installation phase, the Marine Coordinator will manage all construction vessel logistics between staging ports and the WDA, keep informed of all planned vessel deployment and liaise with the USCG, port authorities, state and local law enforcement, marine patrol, and port operators. Larger vessels used to install foundations, ESPs, and WTGs in federal waters will likely remain within federal waters and use port facilities or impact navigation within state waters to make infrequent bunkering trips. Vessels making round-trips from port facilities in Massachusetts are primarily smaller crew transport vessels (CTVs), tugboats, and jack-up vessels. Although an average of 25 vessels will be involved in construction activities on any given day, the SDEIR anticipates an average of 10 daily trips between both the primary and secondary ports and the WDA during construction.

Decommissioning

Decommissioning activities are anticipated to require federal, state, regional, and local permitting. The Proponent is required to “remove or decommission all facilities, projects, cables, pipelines, and obstructions and clear the seafloor of all obstructions created by activities on the leased area, including any project easements(s) within two years following lease termination, whether by expiration, cancellation, contraction, or relinquishment, in accordance with any approved Site Assessment Plan (SAP), COP or approved Decommissioning Application and applicable regulations in 30 CFR Part 585.” The SDEIR indicates that these regulations extend to the full project, onshore and offshore, and in state and federal waters. The decommissioning application must be submitted to BOEM for its review and approval prior to decommissioning. It will include an analysis of resources, conditions, and activities that could be impacted by or could impact the decommissioning activities, a schedule, plans for disposal/reuse of removed facilities, and measures to protect archaeological and sensitive biological features and avoid discharge of pollutants. In addition, the Proponent will be required to set aside decommissioning funds (bond or other guaranteed financial assurance) in an amount determined by BOEM based on anticipated decommissioning costs pursuant to 30 CFR 585.516.

Decommissioning of the Project includes retirement in place or removal of offshore export cables, potential removal of onshore export cables and potential removal of substation equipment. Equipment and vessels used during decommissioning will likely be similar to those used during construction and installation. The Project’s equipment is expected to have a life expectancy of up to 30 years and decommissioning would begin no earlier than 2052. The SDEIR does not identify potential environmental impacts associated with each decommissioning alternative. The Proponent asserts that it is challenging to quantify impacts associated with decommissioning at this time because experience in the European offshore wind industry and technological advances in methods and equipment may result in increased efficiencies and reduced environmental impacts associated with decommissioning.

The SDEIR addresses potential conflicts for future uses such as sewer or water mains within streets where splice vaults, conduits, and duct banks are left in place. The SDEIR indicates that the

Proponent has worked with town officials to assess potential onshore cable routes, which included identification of existing and planned underground municipal infrastructure. The Proponent commits to working with the Town of Yarmouth to ensure that the onshore duct bank will not conflict with potential sewer installation.

Conclusion

Based on a review of the SDEIR, the Scope included in the Certificate on the DEIR, consultation with State Agencies and review of comment letters, I have determined that the SDEIR is responsive to the Scope. Significant changes to the project identified in the SDEIR and during MEPA review will reduce environmental impacts compared to the DEIR. The Proponent should prepare the FEIR consistent with the Scope outlined below.

SCOPE

General

The FEIR should follow Section 11.07 of the MEPA regulations for outline and content, as modified by this Scope. Additional recommendations provided in this Certificate may result in a modified design that enhances the ability to avoid, minimize, or mitigate Damage to the Environment. The FEIR should discuss steps the Proponent has taken to further reduce the impacts of the project since the filing of the SDEIR, or, if certain measures are infeasible, the FEIR should discuss why these measures will not be adopted.

The FEIR should clearly identify the selection of the Covell's Beach landing site as the Preferred Route and identify its commitment to design and permit the project accordingly while continuing to include the New Hampshire Avenue landing site as the Noticed Alternative. The FEIR should address how and under what circumstances a subsequent change in routing would be disclosed to regulators and the public.

Project Description and Permitting

The FEIR should describe any changes to the project since the filing of the SDEIR. It should include updated site plans for existing and proposed conditions. Conceptual plans should be provided at a legible scale and clearly identify all: major project components; impervious areas; ownership of parcels including easement areas; stormwater, and utility infrastructure; and the location of wetland resource areas. The FEIR should include a list of required Permits, Financial Assistance, or other State approvals and provide an update on status. The FEIR should note that the project will require a Letter of Authorization and/or Scientific Permit from DMF for surveys and for the pre-lay grapnel run. The FEIR should provide an update on the federal and local review and permitting processes.

The FEIR should clarify whether the area of Covell's Beach affected by the project is protected by Article 97. If it is determined that it is Article 97 land, the FEIR must include an evaluation of

consistency with the Executive Office of Energy and Environmental Affairs (EEA) Article 97 Land Disposition Policy (Article 97 Policy).

The FEIR should provide information regarding the project schedule and construction sequencing for both onshore and offshore project elements.

Ocean Management Plan

The FEIR should include additional information to demonstrate that the selected route and cable laying method(s) will minimize impacts to hard/complex bottom. The FEIR should clearly delineate and describe the extent and area of hard bottom that cannot be avoided and must be excavated or covered to successfully bury the cables. The FEIR should include additional images obtained and habitat classification analysis conducted based on field surveys and investigations for areas where identified hard bottom and biogenic habitats are within or proximate to the cable footprint. It should provide updates and identification of specific areas of proposed construction activity (dredging, cable laying, vessel anchoring, dredged material deposition or disposal, cable burial), and provision of more detailed anchoring plans.

The FEIR should address the Project's consistency with the siting and management standards of the OMP for the routes through Muskeget Channel and landing at Covell's Beach. The FEIR should clearly demonstrate how the public benefits of the project outweigh the public detriments to SSU resources.

Comments from CZM and DMF emphasize the importance of selecting methods and equipment for cable installation that maximize avoidance and minimization of impacts to SSU resources. To the extent possible, installation methods, such as jet plowing and remotely operated seabed tractors that achieve burial with minimal seabed disturbance (including footprint, width of trench, and sidecast and suspension of sediments) should be used. The FEIR should include a commitment to develop an inspection and maintenance plan to assess coverage of the pipeline post-installation and, if problematic areas are identified, to identify measures to reestablish adequate burial or provide protection.

The Proponent and resource agencies have been consulting regarding the multiple and overlapping TOY restrictions which could severely limit, if not preclude, the installation window for the cable. The consultation and prioritization of TOY restrictions and other mitigating measures that will provide a sufficient window for cable installation will continue. The FEIR should include a framework for balancing construction needs and TOY restrictions.

DMF has established a standard protocol for communicating the location and timing of survey activities to fixed gear fishermen which includes using various media sources to alert members of the MLA to the location and start time of a survey, to provide daily updates on activities, to answer inquiries from fishermen, and identifies how to return intercepted gear. The Proponent should work with DMF and the fixed gear community to adopt a similar program to minimize impacts to this commercial fishery during construction.

Wetlands and Waterway

The FEIR should demonstrate that the Project will avoid, minimize or mitigate wetland resource area impacts to the maximum extent practicable. It should outline a comprehensive wetland mitigation program designed to meet ACOE, MassDEP, and local bylaw requirements and performance standards. This mitigation program should include monitoring, construction period measures, and restoration. The FEIR should address comments from CZM, DMF and others regarding identification of impacts to the seafloor and benthic habitat and appropriate mitigation. The FEIR should provide updated information regarding potential impacts to LCS, LUO, Coastal Bank, Coastal Beach and RFA for each cable route. The Proponent has indicated that it will provide all interpreted and raw field data (photos, videos, bathymetry, sidescan, biological and sediment grab samples) from the 2018 marine survey to State Agencies including CZM, MassDEP, DMF and NHESP.

The SDEIR indicates that the Proponent is refining the cable alignment within the installation corridor to avoid and minimize impacts to hard bottom and complex bottom. The FEIR should describe the refined cable alignment within the installation corridor and provide additional information regarding the extent of cable that cannot avoid these areas. To the extent possible based on project design and available data, the FEIR should identify where certain installation methods will be used.

The FEIR should specifically address comments from CZM and DMF regarding offshore cable installation. Estimates of length of hard/complex seafloor disturbed, volume of sand waves to be dredged and volume of fluidized sediment from jet-plowing should be updated using the most recent field data on sediment types, depths and the location and extent of hard/complex seafloor. The lengths, areas and volumes of disturbed seafloor should be recalculated taking into consideration guidance provided by CZM.

Comments from CZM suggest the analysis in the SDEIR may underestimate the potential volumetric impacts associated with dredging of sand waves. The FEIR should clarify the assumptions and assess the height and extent of areas of sand waves, based on marine survey data, to provide updated estimates of the volumetric impacts. The FEIR should assess resources within each proposed disposal area to ensure that impacts to sensitive benthic habitat or fisheries resources will be avoided during these activities. As recommended by CZM, the FEIR should identify potential dredge disposal locations that minimize impacts to benthic resources and to establish areas where dumping will be avoided using recent survey data. Suitable locations should avoid mapped biogenic habitats and identify areas with similar characteristics as the sites from which the material is dredged. The FEIR should clearly depict areas to be dredged and dredge disposal areas in maps with supporting field data. CZM comments indicate that the Proponent should validate areas mapped as biogenic structures and cobble or cobble mixes. The FEIR should incorporate the complete results from the 2018 marine surveys and present the data in a usable format. To the extent practicable, the FEIR should include references/links to the raw field data.

CZM comments note that results from the sediment dispersion modeling appear to integrate the sediment plume impacts over the total period of dredging activity and do not provide information for any given day. The FEIR should include model results for a representative day (potentially with an hourly breakdown) to better understand potential impacts associated with sedimentation and visibility for diving birds. The Proponent should use the 2018 survey data to avoid or minimize laying cable in

large sand waves (to avoid and minimize use of TSHD) and maximize the use of fluidization and jetting (using simultaneous cable lay and burial techniques) to minimize direct impacts to habitat and biota on the seafloor and indirect sedimentation on these resources. The Proponent should commit to verifying modeled results during the installation process and work with CZM and other resource agencies regarding the details of this monitoring program.

Comments from CZM and DMF emphasize that adequate burial of the cable should be maximized and armoring should be avoided to the extent possible. If burial depth is insufficient, the Proponent should employ efforts to rebury the cable to the appropriate depth or, if that is not feasible, cover the cable with sand bags and gravel/cobble cover to mimic adjacent seafloor conditions.

Fisheries Resources

The location and configuration of the WTGs in federal waters will impact resources and uses of State waters. Significant marine vessel navigational activity occurs across the offshore wind lease areas. The SDEIR indicates that the Proponent, in consultation with the Marine Coordinator and Fisheries Liaison, is evaluating the use of consistent transit lanes for construction vessels during the installation phase to reduce conflicts and minimize and eliminate loss of fishing gear. The FEIR should include a commitment to the establishment of transit corridors to ensure the safe passage of a high volume of vessels and identify transit lanes through the offshore lease areas in consultation with CZM, DMF, the MA Fisheries Working Group on Offshore Wind, USCG and other stakeholders. Comments from CZM and DMF provide additional guidance on feasible alternatives.

The FEIR should specify what type(s) of information will be provided regarding commercial and for-hire recreational fishing, how it will be collected, and how potential impacts on commercial and recreational fisheries will be evaluated. It should indicate how these fleets, management agencies and the public will be notified regarding adjustments to surveying, construction or operating procedures. The FEIR should describe appropriate compensatory mitigation for gear loss and lost fishing time. The Proponent should confirm it will use high flyer buoys to delineate active and future cable laying areas which has been a successful strategy in other projects.

The FEIR should include a summary of discussions regarding prioritization of TOY restrictions and a framework for construction sequencing. Comments from DMF indicate that cable laying in July and August instead of April and May avoids a more sensitive TOY for a wide array of natural resources that are actively reproducing and settling in the springtime in Nantucket Sound. The FEIR should describe the methods and results of all eelgrass surveys conducted, including at Spindle Rock and Egg Island. The FEIR should identify the basis for use of the 20 mm sediment deposition threshold for analysis of impacts to shellfish.

The Proponent has indicated that the Noticed Alternative will be carried through permitting. The FEIR should provide additional information regarding marine resources in Lewis Bay and measures to avoid impacts, or where avoidance is not possible, to minimize and mitigate impacts. DMF recommends that the Proponent conduct pre- and post-construction shellfish surveys. The FEIR should provide a map of Lewis Bay and the Noticed Alternative route, indicating the spatial extent of features, including mooring areas, shellfish propagation areas, bay scalloping and fishing areas, and aquaculture sites. The FEIR should describe how the cable could be micro-sited to avoid high density shellfish areas and how

TOY provisions (to avoid Winter Flounder and shellfish spawning seasons) could be employed to minimize impacts to resources in Lewis Bay. For the Noticed Alternative, the FEIR should compare impacts of the open trench and HDD alternatives to boat ramp traffic.

Rare Species, Wildlife, and Marine Resources

The Proponent will continue to work with MassDEP, CZM, DMF and the other resource agencies on development of monitoring plans and establishment of a process for determining if established performance standards have been met. The Proponent is working with DMF to incorporate Sand Lance into the plan to the extent feasible. NHESP will continue to evaluate these impacts as they relate to state-listed tern species and will provide comments on the Benthic Habitat Monitoring Plan. The FEIR should provide an update on these consultations and identify refinements to the plan.

A joint comment letter from CLF, Mass Audubon, NRDC, Environmental League of Massachusetts, NWF and the Acadia Center highlight the need for protection of North American Right Whales. These comments note the measures identified in the SDEIR and COP to avoid and minimize impacts to marine mammals in state and federal waters and urge the Proponent to clarify, strengthen and expand these measures in the FEIR. The FEIR should address the feasibility of incorporating the identified measures into the Project. In addition, it should indicate how and whether marine mammal protection identified in the FEIR will be coordinated and/or funded by the \$15 million Accelerator Program.

NHESP comments continue to express concerns regarding potential impacts of the WTGs on rare and endangered shorebirds including Roseate Tern, Common Tern, and Least Tern associated with their staging, nesting and foraging habitats. The Proponent recently submitted supplemental information to NHESP documenting the results of a boat-based avian survey (focusing on state and federally-listed species during spring migration) within the WDA which confirmed that terns, including Roseate Terns, use the WDA during spring migration. NHESP anticipates providing additional comments and recommendations on the project through the NEPA process. NHESP identifies concerns that impacts to state- and federally-protected Roseate Tern and other listed avian species associated with the project have not been adequately addressed within either the COP or the SDEIR. The FEIR should include a comprehensive, adaptive strategy for avoiding, minimizing and mitigating potential impacts to listed avian species.

The FEIR should include details regarding how the construction activities, particularly in Muskeget Channel, will be timed, staged, and sequenced to minimize impacts to the high density of diving and plunging birds that use the channel for seasonal foraging, in addition to turtles, whales, other marine mammals, and other species of concern. As noted previously, the FEIR should propose a framework for balancing construction needs and TOY restrictions.

Mitigation and Section 61 Findings

The FEIR should include an updated and revised chapter that summarizes proposed mitigation measures and provides individual draft Section 61 Findings for each State Agency that will issue permits for the Project. The FEIR 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. The draft Section 61 Findings provided in the SDEIR are very general and require additional specificity. In addition, they should clearly identify mitigation measures that are limited to a specific route or landing site.

Responses to Comments

The FEIR should contain a copy of this Certificate and a copy of each comment letter received. In order to ensure that the issues raised by commenters are addressed, the FEIR should include direct responses to comments to the extent that they are within MEPA jurisdiction. This directive is not intended, and shall not be construed, to enlarge the scope of the FEIR beyond what has been expressly identified in this certificate. I recommend that the Proponent use either an indexed response to comments format, or a direct narrative response.

Circulation

In accordance with Section 11.16 of the MEPA Regulations, the Proponent should circulate a hard copy of the FEIR to each State Agency and municipal agency from which the Proponent will seek permits or approvals. The Proponent must circulate a copy of the FEIR to all other parties that submitted individual written comments on the ENF, DEIR, and SDEIR.

In accordance with 301 CMR 11.16(5), the Proponent may circulate copies of the FEIR to these other parties in a digital format (e.g., CD-ROM, USB drive) or by directing commenters to a project website address. However, the Proponent should make available a reasonable number of hard copies 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 a letter accompanying the digital copy or identifying the website address of the online version of the FEIR and indicate that hard copies are available upon request, noting relevant comment deadlines, and appropriate addresses for submission of comments. The FEIR submitted to the MEPA office should include a digital copy of the complete document. A copy of the FEIR should be made available for review at the public libraries in Yarmouth, Barnstable, Edgartown, Mashpee and Nantucket.

October 12, 2018

Date



Matthew A. Beaton

Comments received:

09/06/2018	Mark S. Donahue
09/13/2018	Rabbi Elias Lieberman
09/15/2018	Don Mallinson (2 nd comments 10/03/2018)
09/16/2018	Sally Mavroides
09/16/2018	Jeffrey K. Kominers

09/17/2018 Nicola J. Blake, PhD
09/19/2018 Elizabeth Rodio
09/19/2018 Thomas Sullivan
09/20/2018 Linda Ziegler
09/20/2018 Wendy K. Northcross, Cape Cod Chamber of Commerce
09/25/2018 Richard Andre, Vineyard Power Cooperative
09/25/2018 Morgan D. Hodgson
09/25/2018 Eric P.
09/25/2018 Christine K. Greeley
09/25/2018 Dorothy Shannon
09/26/2018 Thomas Hodgson
09/26/2018 Ann Rosenkranz
09/26/2018 Anna Edey
09/26/2018 Katherine DiTrapano (2nd comments – 9/28/2018)
09/26/2018 Robert and Linda Genovese (2nd comments – 9/28/2018)
09/26/2018 Robert Monaldo (2nd comments – 9/28/2018)
09/26/2018 Steve and Donna Boulay
09/27/2018 Loren & Sheila Charif
09/28/2018 David R. Bernstein
09/28/2018 Dr. W. J. Overholtz
09/28/2018 Lisa Coedy
09/28/2018 Resolvert Williams
09/30/2018 Michael B. Jacobs, Vineyard Power Cooperative
09/30/2018 Sarah Jane Hughes
09/30/2018 Tom Soldini
09/30/2018 Laura Plunkett
10/01/2018 Massachusetts Board of Underwater Archaeological Resources (BUAR)
10/01/2018 Michael H. Shaw, Patriot Offshore Inc.
10/01/2018 Bruce S. Sostek
10/01/2018 Illegible signature
10/01/2018 Paul and Amy Thompson
10/01/2018 Kenneth & Cynthia Beebe
10/01/2018 Joanna DiTrapano (2nd comments 10/03/2018)
10/01/2018 Jeanne Fox
10/01/2018 Judy Edmunds
10/01/2018 Ronna C. Johnson (2nd comments 10/03/2018)
10/01/2018 Thomas Finelli
10/01/2018 Susan Seiton
10/01/2018 Donald Sostek
10/01/2018 Alan Richard Sostek
10/01/2018 Joan Ramidas
10/01/2018 Cynthia R.
10/01/2018 Chris Egan
10/01/2018 James and Diane Coco
10/01/2018 Robert and Marguerite Anderson
10/01/2018 J. Goldstein

10/01/2018 Maureen A. and John C. Dolan
 10/01/2018 Mary M. Conneely
 10/01/2018 Thomas and Roberta Burke
 10/01/2018 Donna S. Ripley
 10/01/2018 Robert M. Ripley
 10/01/2018 Maurice and Eileen Cavanaugh
 10/01/2018 Sean and Kelly J.
 10/01/2018 Eileen Larney
 10/01/2018 Paul Loselle
 10/02/2018 Mark Kozma
 10/02/2018 Karen L. O'Connor, PhD
 10/02/2018 Barbara Durkin (2nd comments – 10/02/2018; 3rd, 4th, 5th comments – 10/03/2018)
 10/02/2018 Denise K. Cummings
 10/02/2018 Ardith Orr and John Griesemer
 10/02/2018 Marianne Sforza
 10/02/2018 Alexander and Elizabeth Boyle
 10/02/2018 William T. Lake
 10/03/2018 Association to Preserve Cape Cod (APCC)
 10/03/2018 Martha's Vineyard Commission (MVC)
 10/03/2018 Nicole Morris-McLaughlin, Marion Institute's Southcoast Energy Challenge
 10/03/2018 Tom Durkin
 10/03/2018 Maureen Condon
 10/03/2018 Jonathan Hartzband
 10/03/2018 Sheila B. Place
 10/03/2018 Michelle Sgarlat
 10/03/2018 Susan Starkey
 10/03/2018 Russell and Nancy Twist
 10/03/2018 Jan Hively, PD
 10/03/2018 Barb Lambdin
 10/03/2018 Paul F. Pimentel
 10/03/2018 Dr. and Mrs. Gilbert Brinckerhoff
 10/03/2018 Laurie Gates
 10/03/2018 Dr. David D. Dow
 10/03/2018 Kathleen Schatz
 10/03/2018 Susan Brita
 10/03/2018 Acres of Pines, Inc., Crowell Beach Associates, Inc., Englewood Shores Beach Association, Great Island Associates, Inc., Grist Mill Village Civic Association, Inc., Harborside Estates Beach Association, Hyannis Park Civic Association, Inc., Lewis Bay Neighborhood Association, Inc., Ocean Harbor Estates, Inc., Wimbledon Shores, Inc.
 10/03/2018 Cynthia J. Khoury Bolles
 10/03/2018 Arthur and Judith Warren (corrected version submitted 10/03/2018)
 10/03/2018 Alyssa Greeley
 10/03/2018 Denise Rooney
 10/03/2018 Martha and John Sawyer
 10/03/2018 Jo Daley
 10/03/2018 Richard and Linda Loring

10/03/2018 John Nickandros
10/03/2018 Paul and Veronica Cove (2nd comments late – 10/09/2018)
10/03/2018 Mary Khoury
10/03/2018 Monica Kelley
10/03/2018 Janice VanDenton
10/03/2018 John Crowell
10/03/2018 Illegible signature
10/03/2018 Nancy J. Diomandes
10/03/2018 Thomas and Mary Mara
10/03/2018 Kelly Wietecha
10/03/2018 Susan Doliner
10/03/2018 Karen H. Crowell
10/03/2018 Gail Benson
10/03/2018 Mollie Jean Miller
10/03/2018 Charles E. Moran
10/03/2018 Cristopher Wietecha
10/03/2018 Benjamin D. Van Der Aa
10/03/2018 Judith Green
10/04/2018 Cape Cod Commission (CCC)
10/04/2018 John A. Cooke
10/04/2018 Rachel Youngling, Hyannis Park Civic Association
10/04/2018 Edmund J. Janiunas and Michael Dunbar
10/04/2018 Paul and Keri P.
10/04/2018 Annick S. Cooper
10/04/2018 Michael Dunbar
10/04/2018 Jim Reardon
10/04/2018 David Lowe
10/04/2018 Julie Taberman and Richard Horsley
10/04/2018 Jan Kubiak
10/05/2018 Massachusetts Division of Marine Fisheries (DMF)
10/05/2018 Massachusetts Natural Heritage and Endangered Species Program (NHESP)
10/05/2018 State Senator Julian Cyr and State Representative Dylan Fernandes
10/05/2018 Town of Yarmouth
10/05/2018 Conservation Law Foundation, Natural Resources Defense Council, National Wildlife Federation, Mass Audubon, Environmental League of Massachusetts, and Acadia Center
10/05/2018 Fisheries Survival Fund
10/05/2018 The Town Dock
10/05/2018 Responsible Offshore Development Alliance
10/05/2018 Charles Grant Walker
10/05/2018 Gerard Dhooge, Boston & New England Maritime Trades Council
10/05/2018 Susan L. Moran
10/05/2018 Jim Davos
10/05/2018 Chris Powicki
10/05/2018 Andrea and Dave Slote
10/05/2018 Linda Lancaster
10/05/2018 Warren Adams

10/05/2018 Raymond Rose Jr.
10/05/2018 Angela Carbone
10/05/2018 The DeNucci/Asaley/Busa Families
10/05/2018 Vida R. Morris
10/05/2018 Jeff K. Shrago
10/05/2018 John C. Henderson (2nd comments late – 10/09/2018)
10/05/2018 Martin T. Reilly, former State Senator
10/05/2018 Douglas Lawson (attachment could not be opened)
10/07/2018 Lindsay Crouch
10/08/2018 Unknown
10/09/2018 Massachusetts Historical Commission (MHC)
10/09/2018 Massachusetts Department of Environmental Protection (MassDEP)
10/09/2018 Massachusetts Office of Coastal Zone Management (CZM)

MAB/PPP/ppp