



TOWN OF YARMOUTH

1146 ROUTE 28, SOUTH YARMOUTH, MASSACHUSETTS 02664-4491

Telephone (508) 398-2231 Ext. 1271, Fax (508) 398-2365

BOARD OF
SELECTMEN

TOWN
ADMINISTRATOR
Daniel M. Knapik

January 25, 2019

U.S. Army Corps of Engineers
New England District
Regulatory Division
(ATTN: Christine Jacek)
696 Virginia Road
Concord, MA 01742-2751

Subject: Vineyard Wind COP Draft EIS

Dear Project Manager:

The Town of Yarmouth has reviewed the Draft Environmental Impact Statement (DEIS) submitted by Vineyard Wind LLC for the Vineyard Wind Offshore Wind Energy Project and provides the following comments:

The DEIS refers to two offshore and onshore export cable route (OECRs) options, referred to by the associated cable landing sites at Covell's Beach in the Town of Barnstable and New Hampshire Avenue in the Town of Yarmouth. It is our understanding that Vineyard Wind has revised its preferred alternative to favor a landing site at Covell's Beach over the proposed landing site at New Hampshire Avenue and is now their preferred and intended route. This change to the Covell's Beach landing site reduces the length of the total offshore cable route by approximately 4.5 miles and eliminates the need to cross the existing Nantucket Cable. This shorter offshore cable route will therefore reduce impacts that are proportional to cable length, as well as eliminating potential long term detrimental impacts in Lewis Bay that include impacts to benthic resources, and disruption to commercial fishing, shellfish aquaculture, subsistence fishing, marine businesses, tourism, recreation, anchorage, maintenance dredging, and future improvement dredging.

The Town continues to have concerns with the New Hampshire Avenue landing site alternative due to the following potential impacts:

- Impacts to benthic resources in Lewis Bay from direct mortality, sedimentation, dredging and entrainment, and scouring;
- Impacts to finfish, invertebrate and fish habitat resources in Lewis Bay from turbidity, sedimentation, direct mortality, noise, electromagnetic frequencies, habitat disturbance, and conversion;
- Impacts on commercial fishing, subsistence fishing, aquaculture and disruption of marine businesses in Lewis Bay, including impacts on wild stock shellfish, propagated shellfish, shellfish aquaculture leases, and recreation activities;
- Construction impacts onshore, offshore, and in boating areas on recreation and tourism activities;
- Impacts due to onshore construction noise, dust, and traffic flow disturbances;

- Impacts to navigation and vessel traffic in Lewis Bay during construction, an existing mooring field, and a short term and storm anchorage basin;
- Impact of the buried cable on future Town improvement dredging projects seeking to improve the flushing of Lewis Bay, to improve water quality and aquatic ecosystems;
- The 2015 Massachusetts Ocean Management Plan purposefully omits Lewis Bay as an acceptable site for an offshore wind transmission cable landing; and
- Conflicts between the buried cable duct bank the Town's future plans for sewer installation and existing water supply infrastructure.

The Town of Yarmouth respectfully requests the following items be addressed and agreed upon by the Vineyard Wind should the New Hampshire Avenue cable route and landing site remain an alternate to Covell's Beach. If the New Hampshire Avenue cable route and landing site again becomes the preferred alternative we would request that the company be required to provide the following:

- A detailed pre-project environmental, water quality, and habitat study of the whole of Lewis Bay shall be completed to establish a baseline to assist in proper post-project monitoring and remediation of the impacted estuary;
- The Proponent shall be required to provide compensation for any impacts to shellfish and shellfish habitat and associated commercial and recreational impacts;
- Horizontal direct drilling (HDD) shall be required for laying the cable to New Hampshire Avenue due to the reduced impact to the benthic habitat;
- Adequate containment measures for any hazardous materials/liquids associated with the cable installation both offshore and onshore, including equipment refueling, shall be included in the project design;
- Provide compensation for short term and long term loss of shellfish populations, shellfish habitat, recreational, commercial and aquaculture stocks, and days fished based on historic and preconstruction surveys;
- Financial assurance shall be provided by the proponent shall include costs associated with safety measures for addressing unintended or unforeseen consequences during the construction and operation life time;
- The state or the appropriate agency shall limit the landfall capacity to not allow for further cable capacity, to prevent any future known or unknown utility to utilize any unused bank capacity. This includes any capacity that is proposed for reserve in case of a cable break or other issues that may arise; and
- That the proponent be required to reimburse municipalities where a landfall and cable route of the Vineyard Wind Connector are proposed in order to cover the extensive review costs, to include, but not limited to, legal, engineering; environmental; coastal geologist; maritime or any other appropriate consultant providing expertise in reviewing the proponent's project so as not to burden the taxpaying public of the Town of Yarmouth or other communities for a private entitled financial benefit.

Sincerely,



Daniel M. Knapik
Town Administrator