

48 Glenwood Street, West Yarmouth, MA 02673

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Re: EEA#15787

We submit this in response to the FEIR (12/17/18) and as a summary of the concerns and issues that we have raised with the initial project submission and subsequent filings by Vineyard Wind LLC. As we have expressed before, we do not believe that any approval should be given for the placement of cables in Lewis Bay to either Vineyard Wind or any future entity.

The use of the terms “mitigation,” “we will meet with” and “TBF” are of significant concern when you understand this is a “first time” project for this country. There is little evidence in the world of the use of a shallow environmentally fragile bay/estuary being used in this manner. Lewis Bay should not be the site of an experiment when there are other reasonable, economically feasible alternatives available that will not cause the project any delay or compromise.

1. We continue to be surprised by Vineyard Wind’s statements that “certain Yarmouth residents” (pg. 1-4) are concerned about the cable placement, as opposed to the facts that the 1000+ members of the neighborhood associations abutting the Bay continue their active opposition, along with a 2000+ signature petition from Barnstable and Yarmouth of strong opposition that was submitted to Governor Baker last summer. Work schedules and other commitments made attendance at hearings and open houses more difficult for some of the members of the group, but their research and review involved thousands of hours of work here in Yarmouth. This is significant as the “company views community acceptance and support as a significant factor” in their cable placement (12/17/19 Cover letter Pg. 1-4). There is none in Yarmouth.
2. One of the more serious issues for landing in Lewis Bay is the requirement to place their cables over the existing Nantucket Cable. The depth and clearance as proposed at the October hearings is of great concern. There is no need to cross it if landing is made at Covell’s Beach.
3. The entrance to Lewis Bay through the Hyannis Harbor is both difficult and ever changing. Historical maps clearly document this fact, especially in the areas of Egg Island and Smith’s Point. The need for dredging to maintain the essential commercial channel, along with periodic Coast Guard ice breakers is in the area needed for the cable placement. In addition, issues of Roseate tern habitat exist in this area.
4. The Bay is shallow and a designated estuary. It is so shallow that the survey boat employed by Vineyard Wind was not able to survey any of the shoreline of the Bay in 2018! Nitrogen loading and other important environmental issues are of significant concern to town officials and our residents. We are currently working on long-term plans to address the issues and having to “work around” cables may compromise these plans. In addition, the Bay is the site of a variety of commercial shell fishing and recreational use- including mooring, sailing schools and swimming

in Yarmouth. Having seen the “floating” of displaced cables at Block Island recently is a reminder that what is considered a safe cable burial depth is still an unknown.

There is constant use of the Bay by both Barnstable and Yarmouth- scheduled year-round ferry boat traffic, commercial fishing boats, tour boats, recreational boating, firework barges, and both commercial and personal aircraft traffic overhead (Runway 15-33).

5. The Division of Marine Fisheries in their October letter cited questions about the use of “mitigation” and the research on electromagnetic fields and sedimentation in such shallow waters. The Association to Preserve Cape Cod also notes in their October letter their concerns about the “resuspension and remobilization of nitrogen” in the Bay.
6. The commercial shell fishermen and the Town have raised serious questions about the sedimentation modeling that was done as it appears to be more of an experiment and never done in shallow waters such as this Bay.
7. The maps developed by Vineyard Wind (Attachment A Figure 2-2) all show that the cables will be placed directly through established mooring fields and shell fishing beds in Lewis Bay, especially as they approach the New Hampshire Avenue landing. In addition, the issue of the manner of cable placement (open trench versus HDD) is still in discussion as the Town prefers the later, which will help to protect/preserve the mooring field.
8. The boat ramp layout for New Hampshire Avenue (Attachment A Figure 2-3) visually demonstrates the havoc of the landing and construction requirements. In previous filings the need to bring barges into the area to support construction has been mentioned, but this drawing clearly shows the closure of the street, denial of access to abutting homes and the inadequacies of the landing and staging area. This is in stark contrast to the Covell’s Beach landing and use of their significant parking lot and surrounding roadways. We have previously submitted photographs of the area, the roadway flooding that occurs weekly and the proximity of power poles/lines, fences and trees in the immediate area and route. The blockage of access for parking of the commercial fisherman/shell fishermen is a major issue. The Board of Selectmen and Yarmouth Police Department have actually held public discussions this past year of how to address the significant parking needs in the area- none of which will be helped by this construction plan! No such issues are present at the Covell’s Beach landing.
9. As the cables progress on the proposed route up Berry Avenue and Higgins Crowell Road, there are additional issues of concern. There will be a need for a Zone 1 area easement from the EPA, the cables will pass through the Thornton Brook area and past Yarmouth’s only police center and 2 public schools. The DOT will require street opening permits, and grants of location need to be obtained. None of these issues exist on the Covell’s Beach landing route. Vineyard Wind even states that the “duct bank has a more straightforward approach to the substation” (12/17/18 Cover letter Pg. 1-5) there.

10. We have discussed in prior submissions our concerns about construction/road disruption in any area of Willow Street as it is the primary ambulance corridor to Cape Cod Hospital. In addition, there are still significant unresolved issues of where cable placement would be made through Yarmouth land- on a yet to be designed bicycle trail and through private property requiring easements. No such issues exist with the recently enacted agreements signed with Barnstable and the easy current roadway access to their existing substation.
11. The Host Agreement signed by Vineyard Wind and the Town of Barnstable allows for the construction of cable ducts from the Covell's Beach landing into their roadways that are designed to handle not just the current planned project but also a Phase 2/future project. No such opportunity exists with a landing through Lewis Bay and New Hampshire Avenue.
12. When you read the various letters of support it is significant to note that they generally praise the ideas of renewable energy and the excitement of having the first in the nation project here. They talk about our future energy needs. What they do not cite, quite possibly since we have not yet identified a writer who lives on or near Lewis Bay, are the environmental costs to this shallow, fragile Bay. We have stated, and restate now, that we are not opposed to a wind farm and its environmental benefits. We are adamantly opposed to any placement of cables in Lewis Bay!

The opportunity to read and review the multiple filings and massive binders, attend hearings and to participate in the review process of this project has given us the opportunity to better understand the project and have our concerns received and considered. For that we are deeply appreciative.

We believe that although Vineyard Wind has continued to advance their plans with New Hampshire Ave as an alternative landing site, there are too many issues to ever allow the placement of industrial cables in Lewis Bay. There are a number of alternative locations in this State that have less environmental impact and cost, while having community and citizen support. We ask that you do not approve the New Hampshire Avenue landing as their alternative site- and that it never be approved for use by a future entity.

Sincerely,
Christine K. Greeley
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