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CAPE COD
COMMISSION

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Via Email

January 19, 2018

Matthew A. Beaton, Secretary
Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office, Purvi Patel, Project Analyst
100 Cambridge Street, Suite 900
Boston MA 02114

**Re: *Environmental Notification Form - EEA No. 15787
Vineyard Wind Connector
Towns of Barnstable and Yarmouth
(Commission Project No. 17026)***

Dear Secretary Beaton:

Cape Cod Commission staff reviewed the project with regard to the protected resources and values identified by the Cape Cod Commission Act and the Cape Cod Regional Policy Plan (RPP), and provides the following comments.

The proposed ocean-based cable routes, including the preferred, alternative, and variant routes, pass through and under waters subject to the Cape Cod Ocean Management Plan (CCOMP) and the RPP's Marine Resources section. The CCOMP and RPP identify and map areas as 'prohibited,' 'exclusionary,' or 'provisional' for certain ocean-based activities, including cable installations. The proposed routes pass through areas mapped as 'provisional' within Cape Cod ocean planning areas, where cable installations are permitted, subject to certain performance standards.

These ocean routes appear to have been located to avoid sensitive resources, based on review of available mapping from the Massachusetts Ocean Management Plan and offshore geophysical surveys conducted by the applicant. The Environmental Impact Report (EIR) for the project should further detail the methods of cable installation proposed along the ocean floor as well as confirm that there are no eelgrass beds within the vicinity of the cable routes.

Both the preferred and noticed alternative land-based cable routes (and variant routes presented for portions thereof) are located within existing rights of way, primarily under existing paved surfaces. Commission staff does not anticipate adverse impacts to natural resources from the proposed land installation routes presented, provided best management practices are employed during construction. Staff notes that some of the variant routes involve land currently held for Article 97 purposes. These alternatives should be carefully evaluated and, if ultimately preferred and pursued, the applicant might be responsible to provide suitable mitigation to compensate for the conversion or release of the public's interests in such lands.

The applicant proposes to connect the cables to the grid through an existing electrical substation located on Independence Park Drive in Hyannis. Though this site is within an area mapped both by the Commission and the Town of Barnstable for industrial uses, it is also located within areas mapped both by the Commission and Town of Barnstable for Wellhead Protection purposes. The EIR should provide detailed information about the volume and types of materials anticipated for use at the substation that could pose a threat to groundwater quality and investigate the use of safer alternatives to such materials. In addition, staff suggests that the applicant should further evaluate in its EIR the West Barnstable Substation as a potential interconnect location. Commission staff notes that the applicant deemed the West Barnstable Substation feasible, although not preferred, for interconnection in its EFSB petition.

The EIR should provide more detailed substation plans, including land and tree clearing and design details, so that reviewers may determine what level of impact the substation work might have on surrounding development and uses, and what mitigatory actions might be required to address such impacts. For instance, while the Independence Park Drive site is located within an industrial zoning district, the surrounding area has been zoned, permitted, developed or is proposed to be developed with a variety of different uses including residential, general commercial and recreational uses.

Cape Cod Commission staff note that, as the applicant is required to prepare an Environmental Impact Report for the project, the Commission must ultimately review and permit the project as a Development of Regional Impact after MEPA review is completed, and prior to the applicant obtaining local permits, licenses and approvals. The applicant will ultimately be required to submit for Development of Regional Impact Review a number of plans, documents and studies not in or referenced in the ENF, including a Spill Prevention, Control, and Countermeasure (SPCC) plan; an erosion and sedimentation control plan; stormwater management plans and reports; and a Natural Resources Inventory. It may be helpful and desirable for the applicant to produce and discuss such plans, studies and documents in the EIR.

Thank you for the opportunity to provide comments on the above-referenced Environmental Notification Form. Cape Cod Commission staff is available and happy to answer any questions about these comments.

Sincerely,



Patty Daley
Deputy Director

cc: Project File
Holly Carlson Johnston, Epsilon Associates Inc. via email
Elizabeth Jenkins, Director, Planning & Development, Town of Barnstable via email
Karen Greene, Director, Community Development, Town of Yarmouth via email
Barnstable Cape Cod Commission Representative via email
Yarmouth Cape Cod Commission Representative via email
Sandwich Cape Cod Commission Representative via email
Brewster Cape Cod Commission Representative via email