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January 19, 2022
Secretary Kathleen Theoharides
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky, EEA No. 16231
100 Cambridge Street, Suite 900
Boston, MA 02114

Dear Secretary Theoharides:

The Division of Marine Fisheries (MA DMF) has reviewed the Final Environmental Impact Report (FEIR) by Park City Wind LLC for the New England Wind 1 Connector project (formerly Vineyard Wind Connector 2), which is part of the larger Park City Wind Project. The overall Park City Wind project includes an 800 MW wind turbine array in the central section of BOEM Lease Area OCS A-0501, which is located to the south, southwest of Vineyard Wind 1. The array is anticipated to include from 50 to 81 Wind Turbine Generators (WTGs) outfitted with monopile or piled jacket foundations and oriented in an east-west, north-south grid with 1 nautical mile spacing. The overall project infrastructure includes an offshore electrical service platform, two offshore export cables, and an onshore substation in Barnstable.

The New England Wind 1 Connector project (NE Wind 1 Connector) represents the portion of the Park City Wind project that is within Massachusetts state waters (the OECC is 63 miles long with approximately 23 miles in Massachusetts) and includes only the OECC. NE Wind 1 Connector will largely utilize the OECC developed for the Vineyard Wind Connector 1. However, the OECC has been widened by approximately 985 feet to the west and 985 feet to the east in a section running along Muskeget Channel, increasing the average width to 3,800 feet with a range in width between 3,100 and 5,100 feet.

The cable route would travel between Martha's Vineyard and Nantucket through Muskeget Channel, then continue north through Nantucket Sound to landfall at Craigville Public Beach or Covell's Beach in the Town of Barnstable. It would go through the town waters of Edgartown, Nantucket, Barnstable, and possibly Mashpee. The proposed OECC would contain two 275-kV three-core alternating current (AC) cables and one or more fiber optic cables for communication, temperature measurement, and protection of the high voltage

system with a typical separation between cables of 165 feet. The NE Wind 1 cables would be installed with a minimum separation of 330 feet from the Vineyard Wind 1 cables with greater separation anticipated in the deeper regions of the cable route. The target cable burial depth is 5-8 feet. In areas containing sand waves, dredging is anticipated to achieve adequate burial depth, resulting in estimated potential dredge volumes in state waters up to 106,000 cubic yards across a 25-acre area. An additional 18 acres and 12.7 acres of impact are anticipated from trenching and anchoring, respectively, in state waters. For areas where burial is not feasible, hard structures may be used as cable protection in the form of rock, gabion rock bags, concrete mattresses, or half-shell pipes. Offshore cable installation is proposed using jetting, jet plow, plow, or mechanical trenching. Proposed dredging methods consist of trailing suction hopper dredge (TSHD) or jetting by controlled flow excavation. If TSHD is used, dredge material would be transported and deposited elsewhere within the surveyed area containing sand waves. Horizontal directional drilling (HDD) will be used for the approximate 1,000- to 1,200-foot section reaching the landfall site.

As outlined previously in our Environmental Notification Form (ENF) and Draft Environmental Impact Report (DEIR) comment letters, the OECC traverses habitat for a diverse array of fish and invertebrate species. The primary resources of concern in Nantucket Sound that are vulnerable to the adverse effects of cable laying and EMF include (but are not limited to) shellfish, longfin squid (*Doryteuthis pealeii*) and squid eggs, knobbed whelk (*Busycon carica*) and channeled whelk (*Busycotypus canaliculatus*), and flatfish. Both commercial and recreational fisheries are active throughout the OECC area.

MA DMF previously reviewed the DEIR for this project and submitted a comment letter to MEPA on June 9, 2021 including recommendations for consideration in developing the FEIR. The FEIR includes a copy of our comment letter with responses to our individual comments (DMF 01 through 15). While some of our DEIR comments are clearly and adequately addressed in the FEIR responses, some information requested for inclusion in the FEIR remains outstanding. In many instances, the response section did not directly answer our information requests but instead referenced general sections of the FEIR. The response section should provide direct point-by-point answers to our posed questions and information requests to allow us to more efficiently assess the degree to which the FEIR addresses the recommendations provided from the DEIR review. We further detail our responses to outstanding requests made previously in our DEIR comment letter and provide recommendations for further assessing impact below:

- MA DMF is satisfied with the Proponent's responses to DMF Comments 03-10 and 12-14 provided in Section 7 of the FEIR. Brief clarifying points are made for Comments 05 and 13 and recommendations for more detailed responses are provided below for all remaining MA DMF comments on the DEIR.

- DMF 01 Response: "*Existing benthic habitat within the OECC is described in Section 2.1.1, and a discussion of benthic organisms that incorporates results from the MA inshore bottom trawl survey is provided in Section 2.1.1.1*."
  This response largely addresses MA DMF's request for a more comprehensive description of vulnerable species. Among vulnerable species referenced in our DEIR comment letter, longfin squid and horseshoe crab habitats were only characterized in the FEIR using video survey data. Bottom trawl survey data should also be used to further characterize habitat for these species, although the proposed timing of cable installation to avoid the April to June period in inshore waters should minimize potential impacts to squid resources. Section 2.1.1.1 does not provide strategies for minimizing impacts to sensitive benthic species as requested by MA DMF. Section 2.1.2 provides a description of expected pre-construction species assemblage recovery times, sediment dispersion modeling, and prioritization of least environmentally impactful cable installation machinery. MA DMF recommends that this section be expanded to include minimization strategies (e.g., a comparison of the relative magnitude of cable installation machinery impacts to these species).

- DMF 02 Response: "*As described in the response to MEPA 15, in November 2021, GeoSubsea provided the agencies of the Massachusetts Ocean Team with an external drive containing the requested data from marine surveys of the OECC.*"
  MA DMF has not received these data to date and so reiterates this data request. Data can be sent to: John Logan, Environmental Analyst, MA DMF, 836 S. Rodney French Boulevard, New Bedford, MA 02744. MA DMF continues to request that all substate data be produced in the same Excel spreadsheet as the Commonwealth's substrate data and interpreted substrate units be produced as an ArcGIS shapefile or geodatabase. All data should be provided digitally in formats compatible with ArcGIS to enable comparison with existing datasets. Acoustic mosaics should be provided as geotiffs at the maximum resolution possible. There should be at least four geotiffs provided: multibeam backscatter, sidescan sonar backscatter, multibeam bathymetry, and backscatter draped on bathymetry. The date of data collection should be easily discernable for all products.

- DMF 05 Response: "*The Proponent will coordinate with Mr. Camisa to avoid direct conflicts between cable laying activities and the DMF spring and fall bottom trawl surveys*."
  The MA DMF Resource Assessment Project is currently undergoing restructuring. During this transition period, communications regarding MA DMF's bottom trawl surveys should be directed to Vincent Manfredi and Mark Szymanski.

- DMF 11 Response: "*The discussion of cable protection in Section 2.1.2.3 includes a description of vulnerability to fishing gear impacts."*

MA DMF is satisfied with the expanded discussion of the relative ecological values of cable armoring materials. However, Section 2.1.2.3 states that "*should cable protection be required, it will be designed to minimize impacts to fishing gear to the extent feasible, and fishermen will be informed of the areas where protection is used…Any type of cable protection has the potential to snag fishing gear, but such protection is designed to minimize the risk of such snagging.*" This analysis fails to provide a comparison of the relative vulnerabilities of armoring materials to fishing gear as requested by MA DMF. MA DMF recommends that this section be expanded to compare potential fishing gear impacts across armoring materials.

- DMF 13 Response: "*The habitat value of concrete mattresses is addressed in Section 2.1.2.3. As described in Section 2.1.2.3, the mattresses may also include aerated polyethylene fronds, which will float (resembling seaweed) and encourage sediments to be deposited on the mattress*"
  MA DMF recommends that the potential inclusion of polyethylene fronds be further described and discussed in the state and federal permitting process. In particular, potential frond degradation and creation of marine debris should be assessed.

- DMF 15 Response: "*As discussed in Section 3.1, the Proponent's fisheries science program is currently one of the largest offshore wind-supported programs in the country, with the Proponent providing more than $2 million in annual funding for the SMAST surveys along with financial and technical support for the other fisheries science efforts. The Proponent is an active member and co-chair of the ROSA and financially supporting ROSA-led efforts (through the joint industry task force) to support regional fisheries research and monitoring efforts. The Proponent is also collaborating with several Regional Regulatory and Science Organizations or Entities for long-term fisheries monitoring and research*."
  MA DMF is aware of the ongoing Lobster Ventless Trap, Black Sea Bass, Plankton Survey; Bottom Trawl Survey; and Drop Camera Survey undertaken by SMAST according to recommendations provided by Cadrin et al. (2019) [1]. However, these survey plans and completed reports are specific to the Wind Development Area (WDA) and are not referenced in the FEIR. The only proposed fisheries monitoring described in the FEIR for the NE Wind 1 Connector component of the project in state waters is a nighttime grab sampling survey targeting sand lance (*Ammodytes* spp.). The WDA surveys should be described and any additional fisheries monitoring proposed for the NE Wind 1 Connector should be discussed. Reference to these surveys should incorporate a discussion of post-construction survey timelines and any expected conflicts with future offshore wind development.

- The preferred Benthic Habitat Monitoring Plan (BHMP) (Option 2) does not propose direct sampling of the NE Wind 1 Connector cables because it would be "*difficult to identify impacts and recovery specifically associated with the NE Wind 1 Connector and may lessen the scientific validity of any monitoring done for NE Wind 1 Connector due to the confounding factors associated with adjacent projects. It would also be logistically challenging to monitor the cable pair for NE Wind 1 Connector if construction is ongoing for cables farther west because safety zones around installation equipment and anchor spreads may interfere with access to monitoring sites*." Instead, Option 2 proposes to sample NE Wind 2 Connector, stating that "*repeating the BAG sample design…would capture the impact and recovery of habitats to the east and west of the entire corridor over the duration of the installation process…without confounding the assessment by sampling in areas with temporally overlapping construction impacts*." While this plan would capture the impact and recovery at the edges of the entire cable corridor, it fails to sample the area of the corridor potentially subject to the greatest magnitude of impact due to overlap of Connector project construction schedules. Retaining the BACI design proposed for NE Wind 1 Connector in Option 1 in addition to the BAG designs proposed for both Vineyard Wind 1 Connector and NE Wind 2 Connector projects may provide an opportunity to assess both project-specific impacts at either end of the cable corridor and cumulative impacts at the center of the impact site. Furthermore, as described in the Proponent's response to DMF Comment 06, vessels will not be precluded from operating within the OECC except where temporary 1-km safety buffer zones are established. MA DMF looks forward to working with the Proponent to further refine the BHMP design through the agency working group framework referenced in the FEIR.

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

Sincerely,

Daniel J. McKiernan
Director

cc: Barnstable Conservation Commission
Edgartown Conservation Commission
Mashpee Conservation Commission
Nantucket Conservation Commission
Amy Croteau, Barnstable Natural Resource Officer and Shellfish Constable
Corinne Snowdon, Epsilon Associates
Alison Verkade, Sue Tuxbury, Kaitlyn Shaw, NMFS

Lisa Engler, Todd Callaghan, Robert Boeri, Steve McKenna, CZM
Ed Reiner, Tim Timmerman, EPA
Amy Hoenig, Eve Schluter, DFW
David Wong, David Hill, David Johnston, Mille Garcia-Serrano, DEP
Tori LaBate, DFG
Tracy Pugh, Steve Wilcox, Derek Perry, Melanie Griffin, Kelly Whitmore, Erin Burke, Tom Shields, Mark Rousseau, John Logan, Simonetta Harrison, Keri Anne Goncalves, Emma Gallagher, DMF

References

[1] Cadrin, S., K. Stokesbury, and A. Zygmunt. 2019. *Recommendations for Planning Pre- and Post-Construction Assessments of Fisheries in the Vineyard Wind Offshore Wind Lease Area.* University of Massachusetts Dartmouth, School for Marine Science and Technology, Department of Fisheries Oceanography. https://static1.squarespace.com/static/5a2eae32be42d64ed467f9d1/t/5d67fe0cd3c92c0001a9549d/1567096363797/SMAST+Fishermen+Workshops+Report+and+Studies+Recommendations.pdf.

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