

From: Sedor, Kathryn (DPU) <kathryn.sedor@state.ma.us>
Sent: Friday, January 25, 2019 4:57 PM
To: zgerson@foleyhoag.com; akahn@foleyhoag.com; theuer@foleyhoag.com; Sbode.student@mountsaintvincent.edu; Vincent.Pace@eversource.com; Lisa.Luftig@eversource.com; Paul.Krawczyk@eversource.com; Bianchiassociates@verizon.net; Charles.mclaughlin@town.barnstable.ma.us; jay@mtclawyers.com; brian@mtclawyers.com; vonHone, Karl; Neven.Rabadjija@eversource.com; Be97@stanford.edu; sfbrita@gmail.com; Greeleyc@comcast.net; Ronna.Johnson@tufts.edu; jchone@comcast.net; drbern@comcast.net; Jeffrey Bernstein; Audrey Eidelman; kterrell@bck.com; tide2431@gmail.com; ejaniunas@gmail.com
Cc: Efiling, DPU (DPU)
Subject: FW: Written Comment regarding Vineyard Wind FEIR

From: Arthur Warren [mailto:arthur@afwarren.com]
Sent: Friday, January 25, 2019 4:53 PM
To: Patel, Purvi (EEA)
Cc: Sedor, Kathryn (DPU); judithannwarren@aol.com; selectmen@yarmouth.ma.us; kvonhone@yarmouth.ma.us; ccaia@yarmouth.ma.us; Pierce, David (FWE); Ford, Kathryn (FWE)
Subject: Written Comment regarding Vineyard Wind FEIR

January 25, 2019

Secretary Matthew A. Beaton
Attn: MEPA Office, Purvi Patel
Executive Office of Energy and Environmental Affairs
100 Cambridge Street
Boston, MA 02114

Re:
Vineyard Wind, Petitioner
Written Comments regarding FEIR
EFSB 17-05; D.P.U.18-18; D.P.U. 18-19

Dear Secretary Beaton:

Please accept this email as our Written Comments regarding the Final Environmental Impact Report (FEIR) filed by Vineyard Wind in the above-referenced matter.

We are most concerned that Lewis Bay, a recognized estuary, and the Town of Yarmouth remain in a certain limbo given its status as the identified *alternate route* for the burial and on-shoring of 800-megawatt transmission cables.

We have observed the review process used by your office and the Energy Facilities Siting Board in regard to the appropriateness of both Covell's Beach, Barnstable, as the preferred site, and Lewis Bay and New Hampshire Avenue as the alternate site. This review included: Siting Board hearings, filings by the Massachusetts Division of Marine Fisheries, letters and emails of so many Town of Yarmouth residents and Neighborhood Associations, public meetings, the Petition in Opposition to the Burial of Transmission Cables in Lewis Bay signed by more than 2,000 residents and tourists,

petitions and letters from the aquafarmers, and the meeting in your office with concerned residents. All of this activity demonstrates the extremely high level of concern regarding the inevitable destruction of Lewis Bay to be caused by the trenching and burial of cables.

We also noted the inability of the Town of Yarmouth to participate meaningfully in the highly technical review of this project, due to lack of environmentally trained personnel and funds for scientific and legal expertise, and its silence in the face of possible exemption for Vineyard Wind of its zoning bylaws.

In particular, we noted that during the public hearings, the Siting Board members raised dozens of questions about the appropriateness of Lewis Bay as a burial and landing site. The testimony of the Vineyard Wind witnesses clearly showed that Nantucket Sound and Covell's Beach are locations that are clearly superior in their ability to withstand the interruptions caused by any windfarm cabling project. On the other hand, all answers in regard to the industrialization of Lewis Bay by Vineyard Wind described the extreme challenges to boaters and sailors, mooring fields, the aquafarms, the marine life, the plant life, the Town of Yarmouth recreational quahog program, the commercial quahog and scallop programs, and the Town Sailing program which would arise in the event the cables are brought into Lewis Bay.

All of these concerns for the health of Lewis Bay raised in the hearings remain unanswered by Vineyard Wind in its FEIR.

All of these concerns bring us to these questions:

1. What is the role of the alternate site?
2. Is it intended to be a site which is equally acceptable as the preferred site, or perhaps has some more challenges but yet is still acceptable if not preferable? We believe this is not the case with Lewis Bay, New Hampshire Avenue and the Town of Yarmouth. From a risk-management analysis, this alternate site is not at all acceptable.
3. By accepting Lewis Bay and New Hampshire Avenue as the alternate site, is the Siting Board stating that this location meets the standards set by the Siting Board for the cabling portion of a wind farm project? We hope not. And if not, will you state that fact in your findings and decision?
4. What recourse do the Town of Yarmouth, the residents, the aquafarmers, the sailors and boaters on Lewis Bay, the commercial shell fishermen, and the tourists have in the event the alternate route becomes the preferred route?

We believe the Massachusetts statutes which prescribe the process of identifying preferred and alternate sites is flawed, leaving small towns like Yarmouth without sufficient funds and resources to evaluate, negotiate and defend itself from an unplanned and unsolicited wind farm development. Lewis Bay is an estuary recognized by the U.S. EPA and the Massachusetts EPA and

should be accorded protection as such. The Lewis Bay Embayment is part of one of Cape Cod's watershed receiving precious little fresh water through creeks and streams all of which support Cape Cod's single source aquifer for drinking water.

It is now the duty of the Siting Board to overcome the deficiencies in the law and set the standards for this project and all future wind farm projects in Massachusetts.

Thank you for your review of our concerns.

Sincerely,

Arthur and Judy Warren
2 Shore Road
West Yarmouth, MA 02673
508-380-0355