

**RESPONSE TO TOWN OF NANTUCKET COMMENT LETTER ON THE JOINT CHAPTER 91/SECTION 401  
WQC APPLICATION FOR THE VINEYARD WIND CONNECTOR**

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May 3, 2019

Vineyard Wind is pleased to respond to the Town of Nantucket's comments on the Chapter 91 license application, which we received on April 25th after the close of the comment period. Vineyard Wind has worked and will continue to work closely with the Town to address questions and concerns. In addition to the Chapter 91/Section 401 WQC application itself, Attachment A is a partial list of communications we have had with the Town with regard to the Project.

Vineyard Wind believes the cables to be installed offshore pursuant to the Chapter 91/Section 401 WQC application will have no adverse effect on the coastline, water quality, or on the public's rights to fishing, fowling and navigation. The Town's comments focused on (i) construction-period effects on navigation, (ii) construction-period time-of-year restrictions, and (iii) importance of considering the Order of Conditions issued by the Nantucket Conservation Commission. We address each in turn.

Construction-Period Navigation

As described in Section 3.1.1 of the Joint Chapter 91/Section 401 WQC Application, on average approximately six vessels will be used for cable-laying activities along the OECC in any given month, although as many as nine vessels may be used for cable-laying activities in any one month. Many of the cable installation activities are sequential; therefore, these vessels would not all operate along the OECC simultaneously. The cable laying vessel and safety vessels will follow a pre-identified route at a speed of less than 1 nm/hr and will maintain a moving safety exclusion zone of approximately 0.6-mile radius around installation activity (unless modified in consultation with, or at the direction of, the United States Coast Guard). Vessel traffic associated with Project construction is not anticipated to represent a significant increase over the current levels of vessel traffic within Massachusetts waters in the Project region. The total duration of cable-laying activities in Nantucket waters is expected to be 3 to 4 days per each of the two cables, or 6 to 8 days total.

The Vineyard Wind Project is not proposing any long-term restrictions on navigation, fishing, or the placement or use of fixed or mobile fishing gear in association with the proposed export cables located in state waters, nor are any long-term impacts expected. Temporary safety zones around construction and installation activities will be implemented in coordination with the USCG and may temporarily affect navigation and/or fishing activities in the immediate vicinity of construction and installation vessels. These impacts will be temporary in nature and limited to the Project's construction and installation period. The largest impact expected is simply that, during installation, other vessels in the area would have to navigate a safe distance around the installation site, i.e. the same impact as if a vessel operating in the area encountered any another vessel, as happens routinely during any vessel operations. There will be no restrictions on or impacts to navigation within state waters during the Project's subsequent operations.

During construction and installation, Vineyard Wind will employ a Marine Coordinator to manage all construction vessel logistics and to act as a liaison with the USCG, port authorities, state and local law enforcement, marine patrol, port operators, and the boating and marine community generally. The Marine Coordinator will keep informed of all planned vessel deployment and will manage the Project's marine logistics and vessel traffic coordination between the staging ports and the activities in both federal and state waters. Vineyard Wind has and will continue to comply with official required notices to mariners protocols, as well as communications through a variety of informal channels to mariners likely to be operating in the area of any Vineyard Wind activities.

### TOY Restrictions

DMF commented on TOY restrictions in the agency's comment letter to MassDEP dated March 6, 2019:

*“For the non-HDD portion of the cable laying operation, MA DMF recommends avoidance of the spring season (April-June) within Nantucket Sound waters due to high concentrations of fishing activities and natural resource events (spawning and egg laying). A meeting with Vineyard Wind on 1/31/2019 laid out a sequencing of cable laying that results in fall cable laying in the northern part of the offshore export cable, alleviating our primary time of year concerns. Provided that this updated sequencing is maintained, MA DMF does not have any further TOY restriction recommendations for cable laying operations.”*

As indicated in DMF's comment letter, there are no TOY restrictions necessary through Town of Nantucket waters. The installation methods, the relatively small number of vessels involved, and the relatively short installation duration, together with measures including a variety of communication protocols, use of a Marine Coordinator, and use of safety vessels, as described above, will avoid and minimize impacts to other vessels using waters near the installation activities.

### Nantucket OOC

The Nantucket Conservation Commission issued its Order of Conditions for the Vineyard Wind Connector on March 21, 2019. That Order lays out all of the conditions imposed by the Nantucket Conservation Commission, including 26 “Findings and Additional Conditions.” Vineyard Wind will comply with those conditions. With regard to the interests identified in the Town's comment letter, the Order of Conditions provides that “no work in this area shall be allowed within any time of year restriction as required by the Massachusetts Division of Marine Fisheries or other state or federal agency.”

Attachment A: Partial list of meetings with Town of Nantucket or Nantucket Stakeholders

- December 2016: Meeting with Nantucket Airport
- December 2016: Presentation to Board of Selectmen Meeting & Energy Coordinator
- June 2017: Meeting with Nantucket Wastewater & Energy Coordinator
- June 2017: Meeting with Nantucket DPW
- September 2017: Meeting with Rotary Club
- September 2017: Offshore Wind Visualization Public Meeting
- September 2017: Meeting/Project Update Board of Selectmen
- October 2017: Meeting with Nantucket DPW
- October 2017: Meeting with Wannacomet Water Company
- October 2017: Meeting/Project Update Nantucket Planning and Economic Development Council
- October 2017: Meeting with Nantucket Land Bank
- November 2017: Electronic Project Update Madaket Matters Newsletter – Madaket Residents Association
- December 2017: Meeting/Project Update Board of Selectmen
- December 2017: Received Nantucket’s Letter of Support
- March 2018: Meeting with Marine Mammal Alliance Nantucket
- March 2018: Meeting with community leaders
- March 2018: Offshore Wind Visualization - Nantucket Athenaeum
- March 2018: Meeting/Project Update Board of Selectmen
- April 2018: BOEM Scoping Meeting / Open house
- June 2018: Offshore Wind Visualization - Town Energy Manager Office
- July 2018: Offshore Wind Visualization Public Meeting
- August 2018: Town of Nantucket Offshore Wind Working Group
- August 2018: Town Energy Coordinator
- August 2018: Town Energy Coordinator
- August 2018: Open House and “Meet the Developer” event
- October 2018: Nantucket Energy Coordinator
- October 2018 Offshore Wind Working Group
- November 2018: Nantucket Preservation Trust
- November 2018: HDC Member
- November 2018: Nantucket Energy Coordinator
- November 2018: Board of Selectmen Update
- December 2018: Nantucket Energy Coordinator, HDC Member
- January 2019: BOEM Section 106 Historic Review meeting
- February 2019: Nantucket Energy Coordinator
- February 2019: Offshore Wind working Group
- February 2019: BOEM Draft EIS public meeting
- February 2019: Nantucket Conservation Commission (NOI permit hearing)
- February 2019: Nantucket Conservation commission (NOI permit hearing)
- February 2019: Nantucket Board of Selectmen
- March, 2019: Nantucket Energy Coordinator
- March 2019: Nantucket Conservation Commission (Order of Conditions)
- March 2019: Nantucket Conservation Staff
- April, 2019: Nantucket Energy Coordinator

Official Correspondence and other information about the Project sent to Town (in addition to the relevant Ch 91/WQC applications) include:

- Environmental Notification Form (December 2017)
- Draft Environmental Impact Report (April 2018)
- Information regarding Energy Facilities Siting Board Process (April 2018)
- Supplemental Draft Environmental Impact Report (August 2018)
- Final Environmental Impact Report (December 2018)
- Notice of Intent to Conservation Commission (January 2019)