

Town and County of Nantucket  
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C. Elizabeth Gibson  
Town & County Manager

November 22, 2019

Secretary David Bernhardt  
U.S. Department of the Interior  
1849 C Street, NW  
Washington, DC 20240

**Re: *Vineyard Wind Offshore Energy Project within Lease Area OCS-A 0501***

Dear Secretary Bernhardt:

The Town of Nantucket has continued to monitor BOEM's permitting process for Vineyard Wind and for the other lease areas off the Massachusetts coast. Although BOEM has not informed the consulting parties when it will issue a new permitting timetable for the Vineyard Wind project, it is our understanding that BOEM intends to supplement the Draft Environmental Impact Statement in early 2020. The supplement is expected to address cumulative effects, not only for the Vineyard Wind project, but also for the other wind farms proposed for the region. We support BOEM's decision to take a step back to consider the cumulative adverse effects of the wind farms off Nantucket's coasts.

Since the Town last communicated with BOEM in our May 10, 2019 comments about the *Finding of Adverse Effect for Vineyard Wind's Construction and Operations Plan*, the Town has communicated with the Commonwealth of Massachusetts Department of Energy Resources (DOER) about its need to do a better job of protecting historic resources like the Nantucket Historic District from the adverse effects of wind farms built on an industrial scale.

Likewise, we suggest that BOEM require a higher standard for future wind energy development projects that have the potential to affect the Nantucket Historic District and the National Register-listed Nantucket Sound, among other historic places. BOEM has an opportunity now to adopt a more robust approach to evaluating wind energy projects based on best practices, with special emphasis on using all possible planning to eliminate or minimize visual and other adverse impacts to Nantucket, a National Historic Landmark that requires the highest degree of protection available under the law, specifically Section 110(f) of the National Historic Preservation Act.

In case BOEM is not aware, the State of New York has set a higher standard than other states for siting offshore wind turbines by either avoiding or greatly minimizing adverse visual effects.

BOEM should follow New York's lead in protecting these resources from the "Visibility and Viewshed Impacts" of neighboring offshore wind developments to the greatest extent possible.<sup>1</sup>

Such an approach is especially important as future wind energy projects, such as the one proposed by Bay State Wind, have modeled plans for turbines up to 1100' tall. If BOEM were to allow wind turbines at this scale, it would nearly double the adverse visual effects contemplated by the Vineyard Wind project alone. In addition, it would increase exponentially the other direct, indirect, and cumulative adverse effects on Nantucket's residents and property owners who maintain the National Historic Landmark's historic integrity. As we made clear in our letter to DOER, "Nantucket's sustainability must balance clean energy goals with our rich historic cultural identity; the island's past is its future and must be preserved and protected."

As BOEM continues to reassess the cumulative effects of Vineyard Wind's and other proposed wind energy projects, we would like to assure BOEM that the Town of Nantucket will continue to work with Vineyard Wind and all permitting authorities to find a way to balance wind energy goals with our preservation values.

The Town of Nantucket looks forward to its continued participation as a consulting party as soon as BOEM announces a revised permitting timeline.

Respectfully submitted,



C. Elizabeth Gibson  
Town Manager

Enclosure: Town Letter to Massachusetts Department of Energy Resources

cc:

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<sup>1</sup> State of New York Purchase of Offshore Wind Renewable Energy Certificates, Request for Proposals ORECRFP18-1 Release Date: November 8, 2018; Section 6.4.15 "Visibility and Viewshed Impacts"; <https://portal.nyscrda.ny.gov/servlet/servlet.FileDownload?file=00Pt000000Fx0rjEAB>