Appendix I: Finding of Adverse Effect for the SouthCoast Wind Construction and Operations Plan

Please note: This document reflects the status of NHPA Section 106 information and consultations as of October 29, 2024, and has mostly recently been revised based on Tribal Nation and consulting party feedback received during an NHPA review and comment period held from July 1–31, 2024.

The Bureau of Ocean Energy Management (BOEM) has made a Finding of Adverse Effect under Section 106 of the National Historic Preservation Act (NHPA) pursuant to 36 Code of Federal Regulations (CFR) 800.5 for the undertaking, defined as the construction, installation, operations and maintenance (O&M), and conceptual decommissioning of the SouthCoast Wind Project (Project), as described in the SouthCoast Wind Energy, LLC (SouthCoast Wind) Construction and Operations Plan (COP) (SouthCoast Wind 2024). The Project would have adverse effects on historic properties. As defined in 36 CFR 800.16(l)(1), the term *historic property* means "any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places [NRHP; National Register] maintained by the Secretary of the Interior." The term *historic property* also includes National Historic Landmarks (NHLs) as well as sites of traditional religious and cultural importance to Tribal Nations that meet National Register criteria.

BOEM finds that the undertaking would adversely affect the following historic properties:

- One marine archaeological resource (Table I-5; Section I.3.1.1, *Assessment of Effects on Historic Properties in the Marine APE*).
- Two ancient submerged landform features (ASLFs) with potential or known archaeological or traditional cultural place (TCP) significance (Table I-7; Section I.3.1.1, *Assessment of Effects on Historic Properties in the Marine APE*).
- Two terrestrial archaeological resources (Table I-8; Section I.3.1.2, *Assessment of Effects on Historic Properties in the Terrestrial APE*).
- Two TCPs: Chappaquiddick Island and Nantucket Sound (Section I.3.1.1, *Assessment of Effects on Historic Properties in the Marine APE*; Section I.3.1.3, *Assessment of Effects on Historic Properties in the Visual APE*).
- Two aboveground historic properties: the Nantucket Historic District NHL and Oak Grove Cemetery (Section I.3.1.3, *Assessment of Effects on Historic Properties in the Visual APE*).

Per 36 CFR 800.5(a)(1), the Project would cause adverse effects on a historic property by altering, directly or indirectly, characteristics that qualify the historic property for inclusion in the National Register (refer to Section I.3, *Application of the Criteria of Adverse Effect*).

Construction of the Project would cause physical adverse effects on historic properties that are marine cultural resources (i.e., marine archaeological resources and ASLFs) in the marine portion of the area of potential effects (APE) and terrestrial archaeological resources in the terrestrial portion of the APE as

Project components and/or associated work zones are proposed for locations within the defined areas of these resources (COP, Appendices Q and R; SouthCoast Wind 2024). Additional terrestrial archaeological resources potentially subject to adverse effects from the Project may be identified during SouthCoast Wind's process of phased identification and evaluation of historic properties as defined in 36 CFR 800.4(b)(2) (COP, Appendix R.2; SouthCoast Wind 2024; Section I.5, *Phased Identification and Evaluation*).

The Project would also cause visual effects, and contribute to cumulative effects, on two historic properties that are TCPs: Chappaquiddick Island and Nantucket Sound. For Chappaquiddick Island TCP and Nantucket Sound TCP, BOEM determined that contributing historic aboveground elements would be visually affected by the visibility of Offshore Project components (COP, Appendix S; SouthCoast Wind 2024).

In addition to the two aforementioned TCPs, the Project would also cause visual effects from Project component visibility on two other aboveground historic properties: the Oak Grove Cemetery in Falmouth, Massachusetts, and Nantucket Historic District NHL (COP, Appendix S; SouthCoast Wind 2024). The Oak Grove Cemetery has landscape views that are a character-defining feature contributing to its NRHP eligibility; these landscape views are subject to adverse effects from Onshore Project components associated with the Lawrence Lynch substation. The Nantucket Historic District NHL has ocean views that are a character-defining feature contributing to the historic property's NRHP eligibility and subject to adverse effect from Offshore Project components. BOEM has determined that the Project would contribute to cumulative adverse effects from Offshore Project component visibility to this NHL. For compliance with NHPA Section 110(f) per 36 CFR 800.10, which applies specifically to NHLs, BOEM has determined that the Nantucket Historic District NHL would be adversely affected by the Project and has, to the maximum extent possible, undertaken planning and actions as may be necessary to minimize harm to the NHL.

BOEM elected to use the National Environmental Policy Act (NEPA) substitution process for Section 106 purposes, as described in 36 CFR 800.8(c), during its review. The regulations at 36 CFR 800.8(c) provide for use of the NEPA substitution process to fulfill a federal agency's NHPA Section 106 review obligations in lieu of the procedures set forth in 36 CFR 800.3 through 800.6. The NEPA substitution process is described at https://www.achp.gov/integrating_nepa_106. Both NEPA and Section 106 allow participation of consulting parties. Consistent with use of the NEPA substitution process to fulfill Section 106 requirements, BOEM has stipulated mitigation measures to resolve adverse effects in a Memorandum of Agreement (MOA) pursuant to 36 CFR 800.8(c)(4)(i)(B). Simultaneous to the publication of this Final EIS, BOEM is coordinating with signatories to the MOA to have the MOA fully signed and executed no later than December 19, 2024. The version of the MOA, attached to this document as Attachment A, is a draft of the MOA as of September 30, 2024. The executed MOA will be posted on BOEM's website following issuance of the Record of Decision (ROD): https://www.boem.gov/renewable-energy/state-activities/southcoast-wind-formerly-mayflower-wind.

I.1 Project Overview

In February 2021, BOEM received a COP from SouthCoast Wind proposing an offshore wind energy facility in Renewable Energy Lease Area OCS-A 0521 (Lease Area), offshore Massachusetts. In addition, SouthCoast Wind submitted updates to the COP in August 2021, October 2021, March 2022, December 2022, and September 2023. In its COP, SouthCoast Wind proposes construction and installation, O&M, and conceptual decommissioning of an up to 2,400-megawatt (MW) wind energy project consisting of offshore wind turbine generators (WTGs) and their foundations, offshore substation platforms (OSPs) and their foundations, scour protection for foundations, interarray cables linking the individual turbines to the OSPs, offshore export cables and an onshore export cable system, onshore substations, and connections to the existing electrical grid in Massachusetts (Figure I-1). At their nearest point, WTG and OSP components of the Project would be approximately 26 nautical miles (30 statutory miles, 48 kilometers) south of Martha's Vineyard and 20 nautical miles (23 statutory miles, 37 kilometers) south of Nantucket, Massachusetts. Offshore Project components would be on the OCS, with the exception of portions of the offshore export cables in Massachusetts and Rhode Island state waters. SouthCoast Wind is using a Project Design Envelope (PDE) in its COP, which represents a reasonable range of design parameters that may be used for the Project. In reviewing the PDE, BOEM is analyzing the maximum-case scenario that could occur from any combination of the contemplated parameters. This includes any Project alternatives that may require phased identification of historic properties (COP, Appendix R.2; SouthCoast Wind 2024; Section I.5, *Phased Identification and Evaluation*). BOEM's analysis and review of the PDE may result in the approval of a project that is constructed within that range or a subset of design parameters within the proposed range.

If approved by BOEM and other agencies with authority to approve Project components outside of BOEM's jurisdiction, SouthCoast Wind would construct and operate WTGs, export cables to shore, and associated facilities, including those outside BOEM's jurisdiction, for a specified term. BOEM is now conducting its environmental and technical reviews of the COP and has published a Final Environmental Impact Statement (EIS) under NEPA for its decision regarding approval of the plan. A detailed description of the proposed Project can be found in Chapter 2, *Alternatives*, of the Final EIS. This Final EIS considers reasonably foreseeable impacts of the Project, including impacts on cultural resources, which include historic properties.

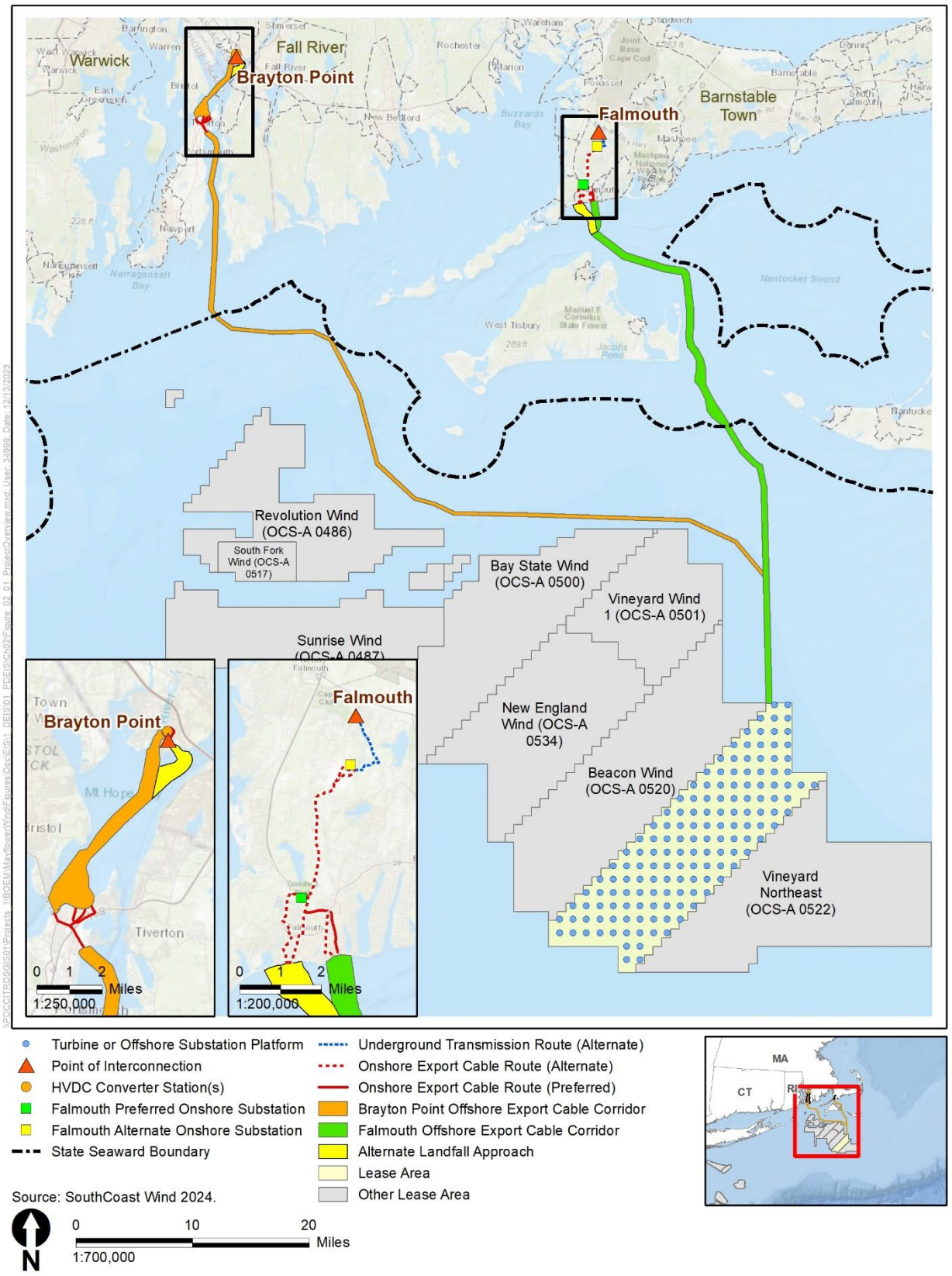

Figure I-1. SouthCoast Wind COP proposed Project elements

I.1.1 Background

The Project is in a commercial lease area that received previous Section 106 review by BOEM regarding the issuance of the commercial lease and approval of site assessment activities.

On February 6, 2012, BOEM published in the *Federal Register* (FR) a *Notice of Intent to Prepare an Environmental Assessment for Commercial Wind Lease Issuance and Site Characterization Activities on the Atlantic OCS Offshore Massachusetts* (77 FR 5830). On November 2, 2012, BOEM announced the availability of an environmental assessment (EA) for public review and comment (77 FR 66185). BOEM considered comments received from this notice and on June 18, 2014, made available a revised EA for the Wind Energy Area (WEA) offshore Massachusetts (79 FR 34781). As a result of the analysis in the revised EA, BOEM issued a Finding of No Significant Impact, which concluded that reasonably foreseeable environmental effects associated with commercial wind lease issuance and related site assessment activities would not significantly affect the environment. The Section 106 process was completed pursuant to a programmatic agreement (PA), executed on June 8, 2012 (*Programmatic Agreement among the U.S. Department of the Interior, Bureau of Ocean Energy Management; the State Historic Preservation Officers of Massachusetts and Rhode Island; the Mashpee Wampanoag Tribe; the Narragansett Indian Tribe; the Wampanoag Tribe of Gay Head (Aquinnah); and the Advisory Council on Historic Preservation Regarding the "Smart from the Start" Atlantic Wind Energy Initiative: Leasing and Site Assessment Activities Offshore Massachusetts and Rhode Island*) and concluded with a BOEM determination of no historic properties affected for lease issuance, corresponding to the Finding of No Significant Impact for the EA. On December 2018, BOEM held a competitive lease sale for WEAs offshore Massachusetts. SouthCoast Wind was identified as the winner of Lease Area OCS-A 0521.

Subsequent to award of the lease, SouthCoast Wind submitted a site assessment plan describing the proposed installation, O&M, and decommissioning of a meteorological buoy within the Lease Area. Pursuant to Stipulation 1 of the PA, BOEM issued a Finding of No Historic Properties Affected on January 28, 2020 and notified the signatories of the PA to the finding.

SouthCoast Wind's COP proposed to develop the entire Lease Area as an offshore wind renewable energy project. The Project would consist of up to 149 positions in the Lease Area to be occupied by WTGs and OSPs. The 149 positions would conform to a 1.0-by-1.0-nautical mile (1.9-by-1.9-kilometer) grid layout with an east–west and north–south orientation across the entire Massachusetts Rhode Island Wind Energy Area (MA/RI WEA), as agreed upon by SouthCoast Wind and the other MA/RI WEA leaseholders. WTGs, which would be up to 1,066 feet tall above mean sea level, and OSPs would be connected via interarray cables in the Lease Area. The Project would be developed in two parts or projects: Project 1 refers to the development in the northern portion of the Lease Area and associated interconnection, and Project 2 refers to the development in the southern portion of the Lease Area and associated interconnection.

The Project would include one preferred export cable corridor (ECC) making landfall and interconnecting to the ISO New England Inc. (ISO-NE) grid at Brayton Point in Somerset, Massachusetts. This preferred ECC to Brayton Point will be used for both Project 1 and Project 2 within the Lease Area. The Project will

also include one variant ECC which, if utilized, would make landfall and interconnect to the ISO-NE grid in the town of Falmouth, Massachusetts. In the event that technical, logistical, grid interconnection, or other unforeseen challenges arise during the design and engineering phase that prevent Project 2 from making interconnection at Brayton Point, Project 2 will utilize the Falmouth variant ECC and make landfall and interconnect in Falmouth, Massachusetts.

Within the Brayton Point ECC, up to six submarine offshore export cables, including up to four power cables and up to two dedicated communications cables, would be installed from one or more OSPs in the Lease Area on the OCS, and run through the Sakonnet River, make intermediate landfall on Aquidneck Island in Portsmouth, Rhode Island, which includes an underground onshore export cable route, and then into Mount Hope Bay, to make landfall at Brayton Point in Somerset, Massachusetts. The two landfall sites considered in the PDE include developed coastal locations on either side of Brayton Point: the Western landfall from the Lee River and the Eastern landfall from the Taunton River.

Within the variant Falmouth ECC, up to five submarine offshore export cables, including up to four power cables and up to one dedicated communications cable, would be installed from one or more OSPs in the Lease Area on the OCS, and run through Muskeget Channel into Nantucket Sound in Massachusetts state waters, to make landfall in Falmouth, Massachusetts. The three landfall sites considered in the PDE include coastal locations at the end of Worcester Avenue, Central Park, and Shore Street.

SouthCoast Wind would use horizontal directional drilling (HDD) for the sea-to-shore transition of export cables between the ocean and the land. For the offshore export cable landfall sites at Brayton Point in Somerset, Massachusetts, up to four new underground onshore export power cables would transmit the Project's high-voltage direct-current (HVDC) electric generation to up to two new, SouthCoast Wind-developed onshore HVDC converter stations. The onshore converter stations are specialized electrical substations designed to convert the HVDC power from the export cables to high-voltage alternating-current power to enable interconnection to the existing transmission infrastructure. The new underground 345-kV transmission line would be constructed entirely within the previously disturbed industrial Brayton Point property. The underground transmission line would connect the converter stations to the existing National Grid Substation at Brayton Point in Somerset, Massachusetts, the Brayton Point POI. Collectively, these onshore components at Brayton Point in Somerset, Massachusetts are referred to as the Brayton Point Onshore Project Area.

For the variant Falmouth interconnection, up to 12 new underground onshore export power cables would transmit the proposed Project's electric generation from the landfall site to a new SouthCoast Wind-developed onshore substation. The onshore export cables would travel underground from the landfall location to the newly constructed onshore substation, located in Falmouth, Massachusetts. There are two onshore substation locations under consideration in Falmouth, Massachusetts consisting of the potential Lawrence Lynch (preferred) substation site and the potential Cape Cod Aggregates (alternative) substation site. The onshore substation would transform the export cable voltage to 345 kilovolts (kV) to enable connection to the transmission line. Eversource Energy (Eversource) would be responsible for designing, permitting, constructing, and operating the overhead transmission line in

Eversource Right-of-Way #341 that would connect the proposed onshore substation to the existing POI at Falmouth Tap in Falmouth, Massachusetts; the overheard transmission line is not considered part of the PDE. Alternatively, the Project is also considering an underground transmission route, which would connect the onshore substation to the Falmouth POI. Collectively, these onshore components in Falmouth, Massachusetts are referred to as the Falmouth Onshore Project Area.

The proposed Project has a designed life span of approximately 35 years; some installations and components may remain fit for continued service after this time. O&M activities would include inspections, preventative maintenance, and, as needed, corrective maintenance for onshore substations, onshore export cables, and grid connections. SouthCoast Wind would conduct annual maintenance of WTGs, including safety surveys of lifesaving equipment. Substructures would undergo internal and external inspections every 2 years. SouthCoast Wind would need to use vessels, vehicles, and aircraft during O&M activities.

Although the proposed Project is anticipated to have an operational life of 35 years, it is possible that some installations and components may remain fit for continued service after this time. SouthCoast Wind would have to apply for and be granted a renewal of the operations term of its lease under BOEM's regulations at 30 CFR 585.425, et seq., if it wanted to operate the proposed Project for more than the 33-year operations term stated in its lease. The process of decommissioning would remove all facilities, cables, pipelines, and obstructions and clear the seafloor of all obstructions created by the proposed Project. All foundations would need to be removed 15 feet (4.6 meters) below the mudline (30 CFR 285.910(a)). Absent permission from BOEM, SouthCoast Wind would have to achieve complete decommissioning within 2 years of termination of the lease and either reuse, recycle, or responsibly dispose of all materials removed. A Section 106 review would be conducted at the decommissioning stage.

I.1.2 Undertaking

BOEM has determined that the Project constitutes an undertaking subject to Section 106 of the NHPA as amended (54 USC 306108) and its implementing regulations (36 CFR 800), and the Project activities proposed under the COP have the potential to affect historic properties. Confidential appendices to the COP referenced in this document were sent electronically or by mail depending on expressed preference to consulting parties on February 2, 2023, January 17, 2024, and September 30, 2024. The COP, as well as its public and confidential appendices, is hereby incorporated by reference.

The undertaking for this Section 106 review is the Proposed Action. As described in Chapter 2, Section 2.1.2, *Alternative B – Proposed Action*, of the Final EIS, the Proposed Action would include the construction, installation, O&M, and conceptual decommissioning of a wind energy facility on the OCS offshore Massachusetts, occurring within the range of design parameters outlined in the COP (SouthCoast Wind 2024), subject to applicable mitigation measures. BOEM's election to use NEPA substitution for the Section 106 review of the Project includes the identification and evaluation of historic properties for the undertaking and assessment of effects for all the action alternatives identified

during the NEPA review and as presented in the Final EIS. For BOEM's assessment of the action alternatives, see Section I.4.1, *Alternatives Considered*.

I.1.3 Area of Potential Effects

Per 36 CFR 800.16(d), the APE is defined as "the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist." BOEM (2020) defines the APE for the undertaking to include the following areas:

- The depth and breadth of the seabed potentially impacted by any bottom-disturbing activities, constituting the marine portion of the APE.
- The depth and breadth of terrestrial areas potentially impacted by any ground-disturbing activities, constituting the terrestrial portion of the APE.
- The viewshed from which renewable energy structures, whether offshore or onshore, would be visible, constituting the visual portion of the APE.
- Any temporary or permanent construction or staging areas, both onshore and offshore, which may fall into any of the above portions of the APE.

These are described below in greater detail with respect to the proposed activities, consistent with BOEM's *Guidelines for Providing Archaeological and Historic Property Information Pursuant to 30 CFR Part 585* (BOEM 2020). Refer to Attachment B, Figure I.B-1 for an overview map of the Project APE.

I.1.3.1 Marine Portion of the APE

The marine portion of the APE (hereafter referred to as the *marine APE*) for the Project is the depth and breadth of the seabed potentially impacted by any bottom-disturbing activities and temporary or permanent offshore construction or staging areas. It includes a conservative PDE that can accommodate a number of potential designs, whether piled or suction bucket foundations are used and installed by jack-up vessels as well as necessary support vessels and barges. The marine APE (Figure I.B-2) encompasses activities in the Lease Area (Figure I.B-3), Falmouth offshore ECC (Figure I.B-4), and Brayton Point offshore ECC (Figure I.B-5). The defined vertical extent of the marine APE, as discussed below, varies based on the type of Offshore Project component and accounts for the maximum vertical burial depth and seabed disturbance identified for each of those Project components and their installation.

The Lease Area encompasses 127,388 acres (51,552 hectares) with water depths ranging from 121.7 feet (37.1 meters) to 208.3 feet (63.5 meters) in relation to mean lower low water (MLLW) (COP Volume 1, Section 1.2; SouthCoast Wind 2024). In the Lease Area, SouthCoast Wind proposes up to 149 positions to be occupied by WTGs and OSPs. WTGs and OSPs would be connected via interarray cables in the Lease Area.

The marine APE also includes offshore portions of the two proposed ECCs: Brayton Point and Falmouth ECCs (COP Volume 1, Section 3.3.5 and Table 3-14; SouthCoast Wind 2024). Within the maximum 124-

mile (200-kilometer) long preferred Brayton Point ECC, up to six submarine offshore export cables would be installed from one or more OSPs in the Lease Area on the OCS, and run through the Sakonnet River, make intermediate landfall on Aquidneck Island in Portsmouth, Rhode Island, which includes an underground onshore export cable route, and then into Mount Hope Bay, to make landfall at Brayton Point in Somerset, Massachusetts. Within the maximum 87.0-mile (140.0-kilometer) long variant Falmouth ECC, if it is used, up to five submarine offshore export cables would be installed from one or more OSPs in the Lease Area on the OCS and would run through Muskeget Channel into Nantucket Sound in Massachusetts state waters, to make landfall in Falmouth, Massachusetts. SouthCoast Wind intends to maintain an ECC width of between 2,625 feet to 3,280 feet (800 meters to 1,000 meters) for the Falmouth ECC and between 1,640 feet to 2,300 feet (500 meters to 700 meters) for the Brayton Point ECC to allow for maneuverability during installation and maintenance. The offshore ECCs may be locally narrower or wider to accommodate sensitive locations and to provide sufficient area at landfall locations, at crossing locations, or for anchoring (COP Volume 1, Section 3.3.5.2; SouthCoast Wind 2024).

SouthCoast Wind would use horizontal directional drilling (HDD) for the sea-to-shore transition of export cables between the ocean and the land. Two potential sea-to-shore transition (landfall) locations at Brayton Point in Somerset, Massachusetts, four potential locations on Aquidneck Island in Portsmouth, Rhode Island, and three potential sea-to-shore transition (landfall) locations in Falmouth, Massachusetts are under consideration. The submerged areas of these activities are included in the marine APE; the landfall locations and related HDD activities located onshore are included in the terrestrial APE (discussed in section that follows).

The approximate maximum horizontal area and vertical depth of seabed disturbance associated with the construction or installation each of these aforementioned Offshore Project components and composing the marine APE are provided in Table I-1.

Table I-1. Approximate maximum horizontal and vertical extents of seabed disturbance for construction of Offshore Project components composing the marine APE

Project Component	Seabed Disturbance	
	Maximum Horizontal Area	Maximum Vertical Depth
Per WTG foundation	22.2 ac (9.0 ha); 984 ft x 984 ft (300 m x 300 m)	262 ft (80 m)
Per OSP foundation	22.2 ac (9.0 ha); 984 ft x 984 ft (300 m x 300 m)	262 ft (80 m)
Interarray cables	35,180.6 ac (14,237.1 ha); 497.1 mi (800 km) x 591 ft (180 m)	9.8 ft (3 m)
Brayton Point offshore ECC (Preferred)	Up to 2,300 ft (700 m) centered on the cables along their entire length	16.4 ft (5.0 m)
Brayton Point HDD		98 ft (30 m)
Aquidneck Island HDD		98 ft (30 m)

Project Component	Seabed Disturbance	
	Maximum Horizontal Area	Maximum Vertical Depth
Falmouth offshore ECC (Variant)	2,624-3,280 ft (800-1,000 m) centered on the cables along their entire length	16.4 ft (5.0 m)
Falmouth HDD		98 ft (30 m)

Notes: Cable corridors may be locally wider in specific areas to allow for micro-routing and hazard avoidance. Cables may be micro-routed within the defined and surveyed horizontal marine APE extent.
Source: COP Volume 2, Table 7-1 and Appendix II-Q1, Tables II-1 and II-2; SouthCoast Wind 2024.
ac = acres; ft = feet; ha = hectares; m = meters.

I.1.3.2 Terrestrial Portion of the APE

The terrestrial portion of the APE (hereafter referred to as the *terrestrial APE*) includes the depth and breadth of terrestrial areas potentially impacted by any ground-disturbing activities and temporary or permanent onshore construction or staging areas. The APE is presented as part of a conservative PDE and includes the export cable landfall sites, onshore export cable routes and associated installation areas, onshore HDD areas, onshore substation, and converter stations. Figure I.B-6 depicts the terrestrial APE for onshore cable and landfall site options in Falmouth, Massachusetts. Figure I.B-7 depicts the terrestrial APE for onshore cable and landfall site options in Aquidneck Island in Portsmouth, Rhode Island and Somerset, Massachusetts. Figure I.B-8 depicts the terrestrial APE for onshore cable and landfall site options in Brayton Point in Somerset, Massachusetts. The defined vertical extents of the terrestrial APE, as discussed below, vary based on the type of Onshore Project component and account for the maximum burial depth and vertical ground disturbance identified for each of those Project components and their installation.

The terrestrial APE includes the sea-to-shore transition landfall sites. Two potential sea-to-shore transition locations at Brayton Point in Somerset, Massachusetts, four potential locations on Aquidneck Island in Portsmouth, Rhode Island, and two potential locations in Falmouth, Massachusetts are under consideration (COP Volume 1, Section 3.3.6; SouthCoast Wind 2024). The landfall locations at Brayton Point in Somerset, Massachusetts include the western landfall location from the Lee River and the eastern landfall location from the Taunton River. Additionally, the Brayton Point offshore export cables would make intermediate landfall on Aquidneck Island in Portsmouth, Rhode Island. This landfall would require HDDs at two locations: one entering and one exiting Aquidneck Island. One landfall location is under consideration for entering Aquidneck Island; three route options, one of which has two sub-options, are under consideration for exiting Aquidneck Island. The landfall locations in Falmouth, Massachusetts include Worcester Avenue, Central Park, and Shore Street. At all potential landfall locations, including those on Aquidneck Island, SouthCoast Wind would use HDD to transition between ocean and land (COP Volume 1, Section 3.3.6; SouthCoast Wind 2024).

From the landfall site options, the underground onshore export cables would be routed to the new onshore substation or converter stations, depending on the landfall location (COP Volume 1, Sections 3.3.6 and 3.3.7; SouthCoast Wind 2024). The onshore export cables would be installed in existing roadways, where feasible. As the preferred ECC for Projects 1 and 2, one of two Brayton Point onshore export cable routes from the landfall site options would be used based on landfall site selection. If the

Brayton Point ECC cannot be used for Project 2, one of three Falmouth onshore export cable routes from the landfall site options would be used based on landfall site selection. For the preferred Brayton Point onshore export cable route options, the maximum length would be 3,940 feet (1,200 meters; COP Volume 1, Table 3-18; SouthCoast Wind 2024). Additionally, an intermediate landfall would occur on Aquidneck Island in Portsmouth, Rhode Island, including a 3-mile (4.8-kilometer) underground onshore export cable route, as part of the Brayton Point export cable route. For the variant Falmouth onshore export cable route options, the minimum length would be 1.9 miles (3.0 kilometers) and maximum length would be 6.4 miles (10.3 kilometers) (COP Volume 1, Table 3-18; SouthCoast Wind 2024). The maximum width of the trench excavation for cable installation is anticipated to be approximately 11.0 feet (3.3 meters) per trench (COP Volume 1, Section 3.3.7.1; SouthCoast Wind 2024). In areas where trench boxes cannot be used, the maximum width of disturbance would be 35.0 feet (10.7 meters) per trench

The onshore cables would connect to the proposed onshore substation and converter stations. SouthCoast Wind would commission the development of up to two new HVDC converter stations to convert the Project's HVDC power for interconnection with the Brayton Point POI. The converter stations would be constructed at the site of the former Brayton Point Power Station. If the variant Falmouth ECC is used for Project 2, SouthCoast Wind would commission the development of one new onshore substation to transform the underground export cable transmission circuit for interconnection with the Falmouth POI (COP Volume 1, Section 3.3.8; SouthCoast Wind 2024). There are two onshore substation locations under consideration for the variant Falmouth ECC, including the Lawrence Lynch site at 396 Gifford Street (Option A) and Cape Cod Aggregates site at 469 Thomas Landers Road (Option B).

Since a final determination for the location(s) of the O&M facility has not yet been made, the terrestrial and visual APE for the O&M facility will be defined using a process of phased identification and evaluation, in consultation with BOEM and the State Historic Preservation Officer (SHPO), as defined in 36 CFR 800.4(b)(2).

The approximate maximum horizontal area and vertical depth of ground disturbance associated with constructing or installing each of the aforementioned Onshore Project components and composing the terrestrial APE are provided in Table I-2.

Table I-2. Approximate maximum horizontal and vertical extents of ground disturbance for construction of Onshore Project components composing the terrestrial APE

Project Component		Ground Disturbance (per Project Component)	
		Maximum Horizontal Area	Maximum Vertical Depth
Brayton Point (Preferred)	Export cable landfall	1.2 ac (0.49 ha)	90 ft (27 m)
	Onshore export cable installation area	2.2 ac (0.89 ha)	25 ft (7.6 m)
	Converter stations	10 ac (4.0 ha)	60 ft (18.3 m)
	Underground transmission route	2.2 ac (0.89 ha)	25 ft (7.6 m)

Project Component		Ground Disturbance (per Project Component)	
		Maximum Horizontal Area	Maximum Vertical Depth
Aquidneck (Preferred)	Export cable landfall	1.6 ac (0.65 ha)	90 ft (27 m)
	Onshore export cable route	8.5 ac (3.4 ha)	25 ft (7.6 m)
	Export cable route departure (HDD)	1.8 ac (0.73 ha)	90 ft (27 m)
Falmouth (Variant)	Export cable landfall	2.5 ac (1.0 ha)	90 ft (27 m)
	Onshore export cable installation area	36.2 ac (14.6 ha)	25 ft (7.6 m)
	Onshore substation	31 ac (12.5 ha)	60 ft (18.3 m)
	Underground transmission route	9.0 ac (3.6 ha)	25 ft (7.6 m)

Source: COP Volume 2, Table 7-3; SouthCoast Wind 2024.
ac = acres; ft = feet; ha = hectares; HDD = horizontal directional drilling; m = meters.

I.1.3.3 Visual Portion of the APE

The visual portion of the APE (hereafter referred to as the visual APE) includes the viewshed from which renewable energy structures—whether offshore or onshore—would be visible.

Development of the visual APE for Offshore Project components begins with a boundary of 43 miles radial distance from the Lease Area, which is the approximate maximum theoretical distance—a distance that does not factor in certain environmental factors such as weather or environmental conditions—at which the WTGs could be visible (COP, Appendix S; SouthCoast Wind 2024). Geographic information system analysis and subsequent field investigation delineated the visual APE for Offshore Project components methodically through a series of steps, beginning with the maximum theoretical distance WTGs could be visible. This was determined by first considering the visibility of a WTG from the water level to the tip of an upright rotor blade at a height of 1,066.3 feet (325 meters). The analysis then accounted for how distance and Earth curvature impede visibility as the distance increases between the viewer and WTGs (i.e., by a 43-mile distance, even blade tips would be below the sea level horizon line). The mapping effort then removed all areas with obstructed views toward WTGs, such as those views impeded by intervening topography, vegetation, and structures. Areas with unobstructed views of Offshore Project components then constituted the APE. Based on this analysis, the visual APE for Offshore Project components is defined as portions of the Preliminary APE, which includes all areas with views of the Offshore Project components located within 1 mile (1.6 kilometers) of the southern shorelines of Martha's Vineyard and Nantucket (COP, Appendix S; SouthCoast Wind 2024). Figures I.B-9 through I.B-11 show the visual APE for Offshore Project components. Development of the visual APE for Onshore Project components followed a similar process. The Preliminary visual APE for the Brayton Point Onshore Project area (preferred) was developed based on the maximum height of the onshore structures, including temporary and permanent construction and staging areas, and was refined based on areas of potential visibility through viewshed modeling. Views were verified through field visits in sensitive viewpoints identified in the resultant viewshed, which was determined to be a 0.5-mile (0.8-kilometer) radius around the converter stations siting area (Figure I.B-14; COP, Appendix S.1; SouthCoast Wind 2024). Similarly, a preliminary viewshed was established for the onshore substation locations under consideration in the Falmouth Onshore Project area (variant option), including Lawrence Lynch

(Figure I.B-12) and Cape Cod Aggregates substation (Figure I.B-13), based on the maximum height of the onshore structures, and was refined based on areas of potential visibility. The resultant visual APE reflects the maximum visibility of the substation structures, which considers screening associated with intervening topography, vegetation, and structures. The Preliminary APE for each onshore substation in the Falmouth Onshore Project area is based on actual field verified visibility and is limited to an area extending 0.1 mile (0.16 kilometer) from the substation boundary (COP, Appendix S; SouthCoast Wind 2024). Onshore export cables and transmission routes are anticipated to have only temporary visual effects on aboveground historic properties and TCPs during the construction phase (COP Volume 2, Section 7.3; SouthCoast Wind 2024); therefore, these areas are not included in the visual APE for Onshore Project components. Figures I.B-12 through I.B-14 show the visual APE for Onshore Project components.

BOEM released a technical memorandum delineating the APE on February 2, 2023, and updated June 5, 2024, concurring with the scope and boundaries of the Project APE as defined in the SouthCoast Wind technical reports.

I.2 Steps Taken to Identify Historic Properties

I.2.1 Technical Studies and Reports

To support the identification of historic properties in the APE, SouthCoast Wind has provided technical reports detailing the results of cultural resource investigations in the marine, terrestrial, and visual portions of the APE. Table I-3 provides a summary of these efforts to identify historic properties and the results and key findings of each investigation. Collectively, BOEM finds that these reports represent a good-faith effort to identify historic properties in portions of the Project APE that are not subject to the phased identification process. The documents summarized in Table I-3 have been shared with consulting parties and are hereby incorporated by reference.

BOEM has reviewed the reports summarized in Table I-3, found them sufficient, and reached the following conclusions:

- BOEM has reviewed the Marine Archaeological Resources Assessment (MARA) Report and has determined that the data are sufficient for identifying historic properties in the marine APE.
- BOEM has reviewed the Terrestrial Archaeological Resources Assessment (TARA) Reports and Phased Identification Plan (PIP) and determined that the completed and planned investigations summarized in the documents will be sufficient for identifying historic properties in the terrestrial APE. Efforts conducted for the TARA thus far are sufficient for determining effects on some identified historic properties, but given logistical limitations, not all of the terrestrial APE has been fully investigated. SouthCoast Wind will be using phased identification of historic properties, as defined in 36 CFR 800.4(b)(2), for completion of archaeological investigations in the terrestrial APE, a process specifically provided for in the MOA that will be issued pursuant to 36 CFR 800.8(c)(4)(i)(B). Refer to Section I.5, *Phased Identification and Evaluation,* for additional details on the phased process, and Attachment A for a draft of the MOA as of September 30, 2024.

- BOEM has reviewed the Analysis of Visual Effects to Historic Properties (AVEHP) Reports and determined the studies and reports are sufficient for identifying and assessing effects on historic properties in the visual APE. BOEM finds that the APE for potential visual effects analyzed is appropriate for the scale and scope of the undertaking.

In addition to these conclusions, BOEM has found that the assessment of effects on historic properties in the marine, terrestrial, and visual APEs contained in these reports is sufficient to apply the criteria of adverse effects and continue consultations with consulting parties for resolving adverse effects on historic properties.

Consequent to the reports prepared for the COP submittal, ICF prepared for BOEM a technical report to support BOEM's cumulative effects analysis, the *Cumulative Historic Resources Visual Effects Analysis for SouthCoast Wind Energy Project* (BOEM 2023). The Cumulative Historic Resources Visual Effects Assessment (CHRVEA) presents the analysis of cumulative visual effects where BOEM, in review of the AVEHP (COP, Appendix S; SouthCoast Wind 2024), has determined that Offshore Project components would cause adverse visual effects on historic properties (BOEM 2023). The effects of other reasonably foreseeable wind energy development activities are additive to those adverse effects from the Project, resulting in cumulative effects. Three aboveground historic properties in the viewshed of WTGs for the Project and other reasonably foreseeable offshore wind energy development activities would be adversely affected by cumulative visual effects: the Chappaquiddick Island TCP, Nantucket Historic District NHL, and Nantucket Sound TCP.

Table I-3. Summary of cultural resources investigations performed by SouthCoast Wind in the Project APE

Portion of APE	Report	Description	Key Findings/ Recommendations
Marine	*Marine Archaeological Resources Assessment for the SouthCoast Wind Project Located in Massachusetts and Rhode Island State Waters and OCS Block OCS-A 0521 Offshore Massachusetts* (COP, Appendix Q; SouthCoast Wind 2024)	Marine Archaeological Resources Assessment. Prepared by RCG&A. Assessment of HRG survey data collected during multiple non-intrusive survey campaigns conducted by marine survey contractors and geotechnical investigations in the marine APE representing the extent of anticipated seabed impacts associated with the Project.	RCG&A identified 50 potential marine archaeological resources: five in the Lease Area, 16 in the Falmouth ECC, 25 in the Brayton Point ECC, and four outside the marine APE but included in the report. Upon review of the HRG survey data, 32 of the 46 targets in the marine Preliminary APE (PAPE) have been recommended for avoidance due to their potential cultural significance. The remaining 14 targets were determined to not be culturally significant; therefore, avoidance of these targets was not recommended. RCG&A also identified nine ASLFs in the marine PAPE and seven outside the marine PAPE. All ASLFs in the marine APE have been recommended for avoidance with an avoidance buffer derived from a review of seismic profiles and informed by the ground model to ensure that it covers the extent of the potentially preserved features. The Nantucket Sound TCP was also identified in the marine APE.
Terrestrial	*Archaeological Reconnaissance Survey of SouthCoast Wind Project, Falmouth, Barnstable County, Massachusetts* (COP, Appendix R; SouthCoast Wind 2024)	Terrestrial Archaeological Resources Assessment: Falmouth Phase IA Report. Prepared by AECOM. Background research of known cultural resources, development of archaeological sensitivity model, and reconnaissance-level field assessment of existing field conditions in the Falmouth, Barnstable County, MA portion of the terrestrial APE.	AECOM conducted a reconnaissance study for Onshore Project components in Falmouth, Barnstable County, MA. The survey area included roughly 10.0 mi (16.1 km) of linear routes along with an additional 64 ac (25.9 ha) in larger areas at proposed sea-to-shore transition and facility sites. The reconnaissance survey includes a contextualizing review of existing documentation. Based on that review, an archaeological sensitivity model was developed, identifying much of the survey area to be archaeologically sensitive due to the desirable environmental features that have made the area a place of human habitation for millennia. Lastly, a field assessment was conducted to document existing conditions and provide further nuance to the overall sensitivity. The entire survey area was surveyed, which included 13 soil profiles sampled using a 1-3/8-in diameter split-spoon hand

Portion of APE	Report	Description	Key Findings/ Recommendations
			auger. Additionally, geotechnical borings were assessed for potential buried landscapes at two of the landfall locations.
Terrestrial	Intensive (Locational) Archaeological Survey and Archaeological Construction Monitoring Plan (COP, Appendix R; SouthCoast Wind 2024)	Terrestrial Archaeological Resources Assessment: Falmouth Phase 1B Work Plan. Prepared by AECOM. Work and archaeological construction monitoring plan for AECOM to conduct archaeological field investigation in Falmouth, Barnstable County, MA on behalf of SouthCoast Wind.	No substantive findings or recommendations beyond those presented in *Archaeological Reconnaissance Survey of SouthCoast Wind Project, Falmouth, Barnstable County, Massachusetts* (COP, Appendix R; SouthCoast Wind 2022). Contains work and archaeological construction monitoring plan to conduct archaeological field investigation in Falmouth, Barnstable County, MA.
Terrestrial	*Terrestrial Archaeological Resources Assessment, SouthCoast Wind Offshore Wind Project: Brayton Point HVDC Converter Station Onshore Facilities and Underground Cable Route* (COP, Appendix R; SouthCoast Wind 2024)	Terrestrial Archaeological Resources Assessment: Brayton Point Phase 1A Report. Prepared by PAL. Background research of known cultural resources, previous and current land use, and assessment of archaeological sensitivity in the Somerset, Bristol County, MA portion of the terrestrial APE.	PAL conducted a field assessment for the proposed Brayton Point HVDC converter station onshore component of the Project in Somerset, Bristol County, MA. Historical maps and aerial imagery document substantial development in the Project area since the mid-20th century that includes canal excavation and infilling, power generation facilities improvements and demolition, and environmental management (landfill burial) of waste coal ash. Although pre- and post-Contact archaeological resources have been recorded on Brayton Point and the adjacent area, significant disturbance from previous construction has occurred. Installation of the Brayton Point HVDC converter station, underground cable system, and HDD sites are unlikely to affect any historic properties potentially eligible for listing in the State or NRHP, and no further archaeological investigation was recommended.
Terrestrial	*Terrestrial Archaeological Resources Assessment, SouthCoast Wind Project, Aquidneck Island (Portsmouth) Landfall* (COP, Appendix R; SouthCoast Wind 2024)	Terrestrial Archaeological Resources Assessment: Aquidneck Phase 1A/1B Report. Prepared by PAL. Background research of known cultural resources, previous and current land use, assessment of archaeological sensitivity, and Phase IB subsurface archaeological survey in the Portsmouth, Newport County, RI portion of the terrestrial APE.	Two terrestrial archaeological resources were newly identified in Phase IB survey. Both resources were recommended as potentially eligible for the NRHP under Criteria A and D and for avoidance and/or construction monitoring by the Project. Phase IB survey of Route Segment F and Mount Hope Bridge HDD Option 4 was recommended if Segment F is selected as the preferred duct bank alternate. Archaeological monitoring of HDD Options 1 and 3 was recommended to document any pre- or post-Contact

Portion of APE	Report	Description	Key Findings/ Recommendations
			archaeological features or deposits that may be encountered during boring for the HDDs. No archaeological testing was conducted along Boyds Lane north of Anthony Road; therefore, the presence of archaeological resources along Route Segment F and Mount Hope Bridge HDD Option 4 are unknown.
Visual	*Analysis of Visual Effects to Historic Properties* (COP, Appendix S; SouthCoast Wind 2024)	Historic Resource Visual Effects Assessment. Prepared by AECOM. Background research of known aboveground historic properties and TCPs in the visual APE for offshore and Onshore Project components in Falmouth, MA.	This report analyzed the effects of the Project on historic aboveground resources in the visual PAPE. The report determined that there were 11 historic aboveground resources, historic properties, and historic districts and three TCPs in the visual PAPE for Offshore Project components. The report also determined that there are two historic aboveground resources and historic properties for Onshore Project components in Falmouth, MA. The report recommended that two historic properties would experience an adverse effect as a result of the project: the Nantucket Historic District NHL and the Oak Grove Cemetery in Falmouth, MA.
Visual	*Analysis of Visual Effect to Historic Properties—Brayton Point* (COP, Appendix S.1; SouthCoast Wind 2024)	Historic Resource Visual Effects Assessment. Prepared by Tetra Tech. Visual effects analysis of aboveground historic properties (including known properties and a desktop analysis of potentially eligible properties) in the visual APE for Onshore Project components at Brayton Point in Somerset, MA.	This report analyzed the effects of the Project on historic aboveground resources in the visual PAPE for Onshore Project components at Brayton Point in Somerset, MA. A total of 11 previously identified historic aboveground resources, historic properties, and historic districts identified in this portion of the visual PAPE have potential views of the Onshore Project components. The report concluded that the Project would result in no adverse effect on all 11 properties.

HRG = high-resolution geophysical; PAPE = preliminary area of potential effects

I.2.2 Consultation and Coordination with the Parties and Public

I.2.2.1 Early Coordination

Since 2009, BOEM has coordinated OCS renewable energy activities offshore Massachusetts and Rhode Island with its federal, state, local, and Tribal government partners through its Intergovernmental Renewable Energy Task Force. In January 2019, Governor Christopher Sununu of the State of New Hampshire requested the establishment of an intergovernmental offshore wind renewable energy Task Force for the state. Given the regional nature of offshore wind energy development, BOEM has decided to establish a Gulf of Maine Task Force—including representation from New Hampshire, Massachusetts, Maine, and federally recognized Native American Tribes in the area. BOEM has met regularly with federally recognized Tribes that may be affected by renewable energy activities in the area, specifically during planning for the issuance of leases and review of site assessment activities. BOEM also hosts public information meetings to help keep interested stakeholders updated on major renewable energy milestones. Information pertaining to BOEM's Intergovernmental Renewable Energy Task Force meetings is available at https://www.boem.gov/renewable-energy/state-activities/renewable-energy-task-force-meetings. Information pertaining to BOEM's stakeholder engagement efforts in Massachusetts is available at https://www.boem.gov/renewable-energy/state-activities/massachusetts-activities. Information pertaining to BOEM's stakeholder engagement efforts in Rhode Island is available at https://www.boem.gov/renewable-energy/state-activities/rhode-island-activities. Information pertaining to the Gulf of Maine Task Force is available at: https://www.boem.gov/Gulf-of-Maine.

I.2.2.2 NEPA Scoping and Public Hearing

On November 1, 2021, BOEM announced its Notice of Intent (NOI) to prepare an EIS for the COP. The NOI commenced the public scoping process to identify issues and potential alternatives for consideration in the EIS. Throughout the scoping process, federal agencies; state, Tribal, and local governments; and the general public had the opportunity to help BOEM determine significant resources and issues, impact-producing factors, reasonable alternatives, and potential mitigation measures to be analyzed in the EIS, as well as provide additional information. BOEM also used the NEPA commenting process to allow for public involvement in the NHPA Section 106 consultation process (54 USC 300101 et seq.), as permitted by 36 CFR 800.2(d)(3). Through this notice, BOEM announced its intention to inform its NHPA Section 106 consultation using the NEPA commenting process and invited public comment and input regarding the identification of historic properties or potential effects on historic properties from activities associated with approval of the COP.

Additionally, BOEM held virtual public scoping meetings, which included specific opportunities for engaging on issues relative to NHPA Section 106 for the COP, on November 10, 15, and 18, 2021. Virtual public scoping meeting materials and records are available at https://www.boem.gov/renewable-energy/state-activities/southcoast-wind-virtual-meeting-room.

Through this NEPA scoping process, BOEM received comments related to cultural, historic, archaeological, or Tribal resources. These are presented in BOEM's EIS Scoping Report and are summarized as follows:

- Commenters asked that BOEM ensure compliance with Sections 106 and 110(f) of the NHPA as well as NEPA, including ensuring adequate consultation with consulting parties, SHPOs, Tribal Nations, National Historic Lighthouse and National Historic Lighthouse Preservation Act Lighthouse owners, and other stakeholders throughout the EIS process. Commenters also emphasized that BOEM must consider a wide range of potential effects on historic and cultural resources to ensure compliance with these laws, including visual impacts on NHLs.
- Commenters stated that BOEM should recognize Tribal Nations' sovereign status and provide adequate government-to-government consultation with Tribal governments throughout the EIS process.
- Commenters noted that the proposed Project would have an adverse visual impact on Nantucket's historic properties and cultural heritage, including the Nantucket Historic District, and requested that BOEM select an alternative that preserves the historic integrity of historic properties in Nantucket. Commenters also asked that BOEM consult with the Nantucket Historic District Commission, as well as Nantucket's historic and cultural review boards and stakeholders during any historic or archaeological review.
- Commenters felt that the VIA was not adequate and expressed concern over viewshed or visual impacts on historic properties from the proposed Project including impacts on Nantucket. Commenters requested that additional visual assessments be conducted including during different lighting and atmospheric conditions to accurately assess adverse impacts and to develop appropriate avoidance, minimization, and mitigation (AMM) measures. Other commenters asked for clarification regarding aspects of the VIA including the heights of the key observation points.
- Commenters identified specific historic properties to be identified in the APE for the cultural resources analysis including Nantucket Historic District NHL, Gay Head Light, Muskeget Island National Natural Landmark (NNL), Gay Head Cliff NNL. They also noted that all NHLs, National Historic Lighthouse Preservation Act Lighthouses, and NNLs should be identified on relevant Project maps.
- Commenters asked for Tribal Nations to be included in the development of the Marine Archaeological Resources Assessment and the Terrestrial Resources Assessment, as well as an Unanticipated (Post-Review) Discovery Plan and that the EIS provide an overview of BOEM and proponent engagement with Tribal Nations and a discussion of issues important to Tribal Nations.

On February 17, 2023, BOEM issued a Notice of Availability of the Draft EIS, initiating a 45-day public comment period from February 17 to April 3, 2023 (88 *Federal Register* 10377). BOEM held three virtual public hearings on March 20, March 22, and March 27, 2023. On April 4, 2023, BOEM announced a 15-day extension to the comment period, which concluded on April 18, 2023 (88 *Federal Register* 19986). Public comments were received through Regulations.gov on docket number BOEM-2023-0011, via email and through oral testimony at each of the three public hearings. BOEM received a total of 182 comment submissions from federal and state agencies, Tribal governments, local governments, non-governmental

organizations, and the general public during the comment period. BOEM assessed and considered all the comments received in preparation of the Final EIS.

I.2.2.3 NHPA Section 106 Consultations

On September 29, 2021, BOEM contacted the Advisory Council on Historic Preservation (ACHP), MHC, and RIHPHC to provide Project information and notify these agencies of BOEM's intention to use the NEPA substitution process to fulfill Section 106 obligations under 36 CFR 800.8(c) in lieu of the procedures set forth in 36 CFR 800.3 through 800.6.

On September 29, 2021, BOEM contacted the Delaware Tribe of Indians, Mashantucket (Western) Pequot Tribal Nation, Mashpee Wampanoag Tribe, Mohegan Tribe of Connecticut, The Delaware Nation, The Narragansett Indian Tribe, The Shinnecock Indian Nation, and Wampanoag Tribe of Gay Head (Aquinnah) with information about the Project, and an invitation to be a consulting party to the NHPA Section 106 review of the COP. BOEM also used this correspondence to notify of its intention to use the NEPA substitution process for Section 106 purposes, as described in 36 CFR 800.8(c), during its review. The following five Tribal Nations notified BOEM of their interest in participating as a consulting party: the Mashantucket (Western) Pequot Tribal Nation on October 19, 2021; Mashpee Wampanoag Tribe on October 6, 2021; The Narragansett Indian Tribe on November 1, 2021; The Shinnecock Indian Nation on February 4, 2022; and Wampanoag Tribe of Gay Head (Aquinnah) on November 1, 2021. The Delaware Tribe of Indians and Mohegan Tribe of Connecticut did not respond to BOEM's initiation of consultation; however, BOEM has included these Tribal Nations in all consulting party communications and considers them consulting parties. One Tribe, The Delaware Nation, declined the invitation to be a consulting party on October 13, 2021. BOEM requested information from Tribal consulting parties on sites of religious and cultural significance to the Tribal Nations that the proposed Project could affect, and BOEM offered its assistance in providing additional details and information on the proposed Project to the Tribal Nations.

From September 29 to October 7, 2021, BOEM corresponded with 88 points of contact from local, state, and federal government agencies and agencies and organizations due to the nature of their legal or economic relation to the undertaking or affected properties by mail and email, including information about the Project and an invitation to be a consulting party to the NHPA Section 106 review of the COP. BOEM also used this correspondence to notify of its intention to use the NEPA substitution process for Section 106 purposes, as described in 36 CFR 800.8(c), during its review. To aid those consulting parties not familiar with the NEPA substitution process, BOEM developed a *National Environmental Policy Act (NEPA) Substitution for Section 106 Consulting Party Guide* (available at https://www.boem.gov/sites/default/files/documents/renewable-energy/state-activities/NEPA-Substitution-Consulting-Party-Guide.pdf), which it attached to the correspondence.

On October 8, 2021, BOEM sent a Memorandum of Understanding (MOU) to the Delaware Tribe of Indians, Mashantucket (Western) Pequot Tribal Nation, Mashpee Wampanoag Tribe, Mohegan Tribe of Connecticut, The Delaware Nation, The Narragansett Indian Tribe, The Shinnecock Indian Nation, and

Wampanoag Tribe of Gay Head (Aquinnah) to establish a cooperating Tribal government relationship with the purpose of preparing an EIS.

From October 13 to November 2, 2021, BOEM conducted outreach by phone to confirm receipt of correspondence among the governments and organizations that had not responded to the invitation to consult.

On October 26, 2021, BOEM corresponded with an additional six points of contact from governments and organizations by mail and email, to invite them to be consulting parties to the NHPA Section 106 review of the COP and provide the aforementioned NEPA substitution and Section 106 materials. On November 2, 2021, BOEM conducted outreach by phone to confirm receipt of correspondence among the additional points of contact from governments and organizations.

On November 1, 2021, BOEM contacted ACHP, MHC (the Massachusetts SHPO), the Rhode Island Historical Preservation & Heritage Commission (RIHPHC; the Rhode Island SHPO), and points of contact from consulting party governments and organizations by mail and email to notify all parties of the issuance the NOI to prepare an EIS consistent with NEPA regulations to assess the potential impacts of the Proposed Action and alternatives.

On November 2, 2021, BOEM contacted the Delaware Tribe of Indians, Mashantucket (Western) Pequot Tribal Nation, Mashpee Wampanoag Tribe, Mohegan Tribe of Connecticut, The Narragansett Indian Tribe, The Delaware Nation, The Shinnecock Indian Nation, and Wampanoag Tribe of Gay Head (Aquinnah) by mail and email to notify the Tribal Nations of the issuance the NOI to prepare an EIS consistent with NEPA regulations to assess the potential impacts of the Proposed Action and alternatives.

On November 2, 2021, BOEM invited the Delaware Tribe of Indians, Mashantucket (Western) Pequot Tribal Nation, Mashpee Wampanoag Tribe, Mohegan Tribe of Connecticut, The Delaware Nation, The Narragansett Indian Tribe, The Shinnecock Indian Nation, and Wampanoag Tribe of Gay Head (Aquinnah) to participate in a government-to-government consultation meeting. The email outreach also notified the Tribal Nations that public scoping meeting recordings and materials could be accessed via the virtual meeting website. On November 5, 2021, BOEM distributed an email reminder to consulting parties regarding the opportunity to participate in virtual public scoping meetings on November 10, November 15, and November 18, 2021.

From November 2 to November 18, 2021, BOEM corresponded with Tribal Nations who responded to the government-to-government consultation meeting invitation to schedule the meeting during a day and time of mutual availability.

BOEM invited Delaware Tribe of Indians, Mashantucket (Western) Pequot Tribal Nation, Mashpee Wampanoag Tribe, Mohegan Tribe of Connecticut, The Delaware Nation, The Narragansett Indian Tribe, The Shinnecock Indian Nation, and Wampanoag Tribe of Gay Head (Aquinnah) to participate in a government-to-government consultation meeting on November 19, 2021.

On November 19, 2021, BOEM hosted a government-to-government consultation meeting with Mashantucket (Western) Pequot Tribal Nation, Mashpee Wampanoag Tribe, and Wampanoag Tribe of Gay Head (Aquinnah). During the meeting, BOEM presented information about the NEPA/NHPA review process for offshore renewable energy projects, about the Project, and solicited input regarding reasonable alternatives for consideration in the EIS; the identification of historic properties or potential effects on historic properties from activities associated with the proposed Project; and potential measures to avoid, minimize, or mitigate impacts on environmental and cultural resources to be analyzed in the EIS.

On May 2, 2022, BOEM held a government-to-government meeting with the Chairwoman, Tribal Historic Preservation Officer (THPO), and Council members of the Wampanoag Tribe of Gay Head (Aquinnah). In the meeting, BOEM introduced and discussed the overall renewable energy program and process and summarized details and status of projects off the coast of New England. Topics identified for future discussion included cumulative visual simulations and resource impacts, the transmission process that is part of a lease, decommissioning process and oversight, proposed mitigation plans and agreements, and the Tribal capacity building initiatives.

On June 1, 2022, BOEM held a government-to-government meeting with the Chairwoman and Council members of the Wampanoag Tribe of Gay Head (Aquinnah). This meeting was a follow up to the May 2, 2022, meeting to continue the conversation on various topics and Tribal concerns related to offshore wind development off the New England coast collectively.

On June 2, 2022, the BOEM Director met in-person with the Mashpee Wampanoag Tribe to provide the Tribal Council with an overview of the current state of wind farm permitting off the coast of New England, including Gulf of Maine. Topics discussed during the meeting included the following: project and regional biological and economic concerns and potential mitigation strategies; cumulative visual impacts and simulations; and other programmatic topics, including transmission as part of a lease and capacity building initiatives.

From July 1 to July 8, 2022, BOEM corresponded with an additional three points of contact from governments and organizations by phone, mail, email, to invite them to be consulting parties to the NHPA Section 106 review of the COP and provide the aforementioned NEPA substitution and Section 106 materials.

On July 7, 2022, BOEM held virtual NHPA Section 106 Consultation Meeting #1. The presentation included a brief Project overview, review of NEPA substitution for the NHPA Section 106 process, overview of Section 106 consultation opportunities for the Project, NHPA Section 110(f) compliance requirements, and a question-and-answer session with discussion.

On September 1, 2022, BOEM held a government-to-government meeting with representatives from the Mashantucket (Western) Pequot Tribal Nation, Mashpee Wampanoag Tribe, and Wampanoag Tribe of Gay Head (Aquinnah) to follow up on topics raised during NHPA Section 106 Consulting Meeting #1.

On February 2, 2023, BOEM shared with consulting parties drafts of the cultural resource technical reports prepared by SouthCoast Wind (Table I-3), the Cumulative Historic Resources Visual Effects Assessment (CHRVEA) (BOEM 2023), a technical memorandum detailing the delineation of the APE for the Project, this Finding of Adverse Effect, and the Draft MOA (Draft 1) for a 60-day comment period.

BOEM distributed a Notice of Availability to notify the consulting parties that the Draft EIS was available for public review and comment for a 45-day period commencing on February 17, 2023 (88 *Federal Register* 10377). BOEM held three virtual public hearings on March 20, March 22, and March 27, 2023. On April 3, 2023, BOEM notified consulting parties that the comment period for the Draft EIS and cultural resource technical reports and documents was extended to April 18, 2023. Public comments were received through Regulations.gov on docket number BOEM-2023-0011, via email and through oral testimony at each of the three public hearings. BOEM assessed and considered all the comments received and related to Section 106 consultation in preparation of the Final EIS.

On March 16, 2023, BOEM held virtual NHPA Section 106 Consultation Meeting #2. The presentation included a brief Project overview, an overview of BOEM's APE delineation, a review of the MARA, TARA, AVEHP, and CHRVEA reports, and a question-and-answer session with discussion.

On September 27, 2023, BOEM notified consulting parties that the Project required changes to the schedule for environmental review, which affected the Section 106 consultation schedule under NEPA substitution. BOEM informed consulting parties that project milestones on the Fast-41 permitting dashboard and the Section 106 consultation schedule would be updated when additional information is available about the project schedule.

On January 17, 2024, BOEM shared with consulting parties the revised cultural resource technical reports, Finding of Adverse Effect, and Draft MOA (Draft 2) for a 30-day comment period. At that time, BOEM also shared responses to NHPA Section 106 comments received on the Draft EIS and documents distributed to consulting parties on February 2, 2023.

On January 24, 2024, BOEM held virtual NHPA Section 106 Consultation Meeting #3. The presentation included an overview of Project updates, an overview of the revised technical reports, an overview of APE revisions, a summary of the revised Finding of Effect, and the Draft MOA (Draft 2), and solicited input on avoidance, minimization, mitigation, and monitoring measures to be stipulated in the MOA. The meeting also included a question-and-answer session with discussion.

On July 1, 2024, BOEM shared with consulting parties responses to comments received on documents distributed to consulting parties on January 17, 2024, and the revised cultural resource technical reports, Finding of Adverse Effect, and Draft MOA (Draft 3) for a 30-day comment period.

On July 15, 2024, BOEM held virtual NHPA Section 106 Consultation Meeting #4. The presentation included an overview of Project updates and its schedule, non-substantive revisions made to the cultural resource technical reports, the revised Finding of Adverse Effect, the Draft MOA (Draft 3), and a question-and-answer session with discussion.

On September 30, 2024, BOEM shared with consulting parties responses to comments received on documents distributed to consulting parties on July 1, 2024, and the revised Finding of Adverse Effect and Draft Final MOA (Draft 4) for a 30-day comment period.

On October 8, 2024, BOEM held virtual NHPA Section 106 Consultation Meeting #5. The presentation included an overview of Project updates and was held to consult on and finalize measures to avoid, minimize, and mitigate adverse effects on historic properties as stipulated in the MOA.

[Written in anticipation of Final MOA distribution and execution:] On November 19, 2024, BOEM distributed the Final MOA to signatories, Tribal Nations, and consulting parties for signature. Additional consultation meetings may be scheduled after publication of the Final EIS and prior to issuance of the ROD, if necessary, to resolve adverse effects via the MOA. Additional consultation will also occur for the process of phased identification and evaluation of historic properties to be completed in remaining unsurveyed portions of the terrestrial APE as stipulated in the MOA or if any alternatives that require phased identification are selected for the final Project design (Section I.5, *Phased Identification and Evaluation*). Simultaneous to the publication of the Final EIS, BOEM is coordinating with signatories to the MOA to have the MOA fully signed and executed by December 19, 2024 [anticipated]. The version of the MOA attached to this document as Attachment A is a draft of the MOA as of September 30, 2024 (Draft 4). The fully executed MOA will be posted on BOEM's website at https://www.boem.gov/renewable-energy/state-activities/southcoast-wind-formerly-mayflower-wind.

The list of Tribal Nations, governments, and organizations invited to participate as consulting parties is included in Attachment C. Entities that responded to BOEM's invitation or were subsequently made known to BOEM and added as consulting parties are listed in Attachment D.

I.3 Application of the Criteria of Adverse Effect

The Criteria of Adverse Effect under NHPA Section 106 (36 CFR 800.5(a)(1)) states that an undertaking has an adverse effect on a historic property if the following occurs:

> when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association…Adverse Effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.

According to regulation, adverse effects on historic properties include, but are not limited to (36 CFR 800.5(a)(2)):

i. Physical destruction of or damage to all or part of the property;

ii. Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary of the Interior's standards for the treatment of historic properties (36 CFR part 68) and applicable guidelines;

iii. Removal of the property from its historic location;

iv. Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;

v. Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features;

vi. Neglect of a property that causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and

vii. Transfer, lease, or sale of property out of federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

I.3.1 Assessment of Effects on Historic Properties

This section documents the assessment of effects of the undertaking on historic properties in the marine, terrestrial, and visual APEs.

In addition to the assessment in the following subsections, Final EIS Chapter 3, Section 3.6.2, *Cultural Resources*, analyzes the impacts of the Proposed Action (the undertaking) on cultural resources identified in the APE. This analysis entails the assessment of the Proposed Action's primary impact-producing factors (IPFs) determined relevant to cultural resources; these include accidental releases, anchoring, cable emplacement and maintenance, gear utilization, land disturbance, lighting, noise, and presence of structures. Unlike the other IPFs, accidental releases are considered a type of non-routine event, the occurrence of which is impossible to predict with certainty. Other non-routine events could include corrective maintenance activities; collisions involving vessels or vessels and marine life; allisions (a vessel striking a stationary object) involving vessels and WTGs or OSPs; cable displacement or damage by anchors or fishing gear; chemical spills or releases; severe weather and other natural events; fires; structural failures; and terrorist attacks. In the circumstance of an accidental release or other non-routine event that affects a historic property, BOEM would implement the process for responding to and consulting on an unanticipated effect as defined in the MOA stipulation for Post-Review Discoveries (Stipulation XI; refer to Section I.6, *Post-Review Discoveries and Unanticipated Effects*, for additional information). Refer to Attachment A for a draft of the MOA as of September 30, 2024.

BOEM has considered the primary IPFs for cultural resources in its assessment of the undertaking's potential effects on historic properties as provided in the following subsections. Refer to Table I-4 for descriptions of these IPFs and summaries of BOEM's conclusions as to how the Proposed Action's IPFs may have impacts on cultural resources (refer to Final EIS, Section 3.6.2, *Cultural Resources*, for detailed analyses). BOEM has also considered the IPFs relevant to cultural resources in its assessment of the action alternatives identified during the NEPA review (i.e., Alternatives C, D, E, and F); refer to Section I.4.1, *Alternatives Considered*, for a summary of these alternatives and their potential effects on historic properties.

Table I-4. Primary IPFs and summary of impacts on cultural resources (from Final EIS, Chapter 3, Section 3.6.2, *Cultural Resources*)

IPF	Sources and Activities	Description	Impacts on Cultural Resources [a]
Accidental releases	• Mobile sources (e.g., vessels) • Installation, operation, and maintenance of onshore or offshore stationary sources (e.g., wind turbine generators, offshore substations, transmission lines, and interarray cables)	Refers to unanticipated releases or spills into receiving waters of a fluid or other substance, such as fuel, hazardous materials, suspended sediment, invasive species, trash, or debris. Accidental releases are distinct from routine discharges, consisting of authorized operational effluents, and they are restricted via treatment and monitoring systems and permit limitations.	Overall, localized, short term, and negligible to major depending on the number and scale of accidental releases. Although considered unlikely, large-scale accidental release and associated cleanup could result in temporary to permanent, geographically extensive, and large-scale major impacts.
Anchoring	• Anchoring of vessels • Attachment of a structure to the sea bottom by use of an anchor, mooring, or gravity-based weighted structure (i.e., bottom-founded structure)	Refers to seafloor disturbance (anything below Mean Higher High Water [MHHW]) related to any offshore construction or maintenance activities. Refers to an activity or action that disturbs or attaches objects to the seafloor.	Localized, permanent, and range from negligible to major impacts.
Cable emplacement and maintenance	• Dredging or trenching • Cable placement • Seabed profile alterations • Sediment deposition and burial • Cable protection of concrete mattress and rock placement	Refers to seafloor disturbances (anything below MHHW) related to the installation and maintenance of new offshore submarine cables. Cable placement methods include trenchless installation (such as HDD, direct pipe, and auger bore), jetting, vertical injection, control flow excavation, trenching, and plowing.	Localized, permanent, and range from negligible to major impacts.
Gear utilization	• Monitoring surveys	Refers to entanglement and bycatch during monitoring surveys.	Localized, permanent, and range from negligible to major impacts.
Land disturbance	• Vegetation clearance • Excavation • Grading • Placement of fill material	Refers to land disturbances during onshore construction activities.	Localized, range from short-term to permanent, and range from negligible to major impacts.

IPF	Sources and Activities	Description	Impacts on Cultural Resources [a]
Lighting	• Vessels or offshore structures above or under water • Onshore infrastructure	Refers to lighting associated with offshore wind development and activities that use offshore vessels, and that may produce light above the water onshore and offshore, as well as underwater. Refers to lighting associated with onshore Project infrastructure during construction and O&M, such as permanent lighting at O&M facilities.	Construction and decommissioning area lighting: localized, range from temporary to short-term, and negligible impacts. Operational lighting with use of ADLS: [b] negligible impacts.
Noise	• Aircraft • Vessels • Turbines • Geophysical (HRG surveys) and geotechnical surveys (drilling) • Construction equipment • Operations and maintenance • Onshore and offshore construction and installation • Vibratory and impact pile driving • Dredging and trenching • Unexploded ordnances (UXO) detonations	Refers to noise from various sources. Commonly associated with construction activities, geophysical and geotechnical surveys, and vessel traffic. May be impulsive (e.g., pile driving) or broad spectrum and continuous (e.g., from Project-associated marine transportation vessels and onshore substations). May also be noise generated from turbines themselves or interactions of the turbines with wind and waves.	Overall, negligible to moderate impacts.
Presence of structures	• Onshore structures including towers and transmission cable infrastructure • Offshore structures including WTGs, OSPs, and scour/cable protection	Refers to the post-construction, long-term presence of onshore or offshore structures.	Long-term, continuous, widespread, and moderate impacts.

[a] For the Proposed Action

[b] ADLS would be activated for less than 5 hours per year, or 0.1 percent of nighttime hours, compared to standard continuous Federal Aviation Administration hazard lighting (COP Appendix T, Section 5.1.3; SouthCoast Wind 2024).

Source: Final EIS, Chapter 3, Table 3.1-1, *Primary IPFs addressed in this analysis*, and Section 3.6.2, *Cultural Resources*.

I.3.1.1 Assessment of Effects on Historic Properties in the Marine APE

This section assesses effects on marine cultural resources (i.e., marine archaeological resources and ASLFs, including those affiliated with any TCPs) in the marine APE. Based on the information presented below, BOEM finds that historic properties would be adversely affected in the marine APE.

Marine Archaeological Resources

Marine geophysical archaeological surveys performed for the Proposed Action identified 50 magnetic anomalies, acoustic contacts, and buried reflectors representing potential marine archaeological resources (COP, Appendix Q; SouthCoast Wind 2024). Of this total, 46 resources are in the marine APE: five in the Lease Area, 16 in the Falmouth ECC, and 25 in the Brayton Point ECC. The remaining four other resources were identified outside the marine APE but reported for due diligence purposes; BOEM anticipates the Proposed Action will have no effect on these resources. Of the 46 resources in the marine APE, 32 resources were recommended to be historic properties potentially eligible for listing in the NRHP and are, therefore, considered for potential effects from the undertaking (Table I-4; COP, Appendix Q, SouthCoast Wind 2024). The remaining 14 marine archaeological resources likely relate to recent debris, industrial objects, and non-cultural geological features and therefore are not recommended to be historic properties; these are therefore not considered for potential effects from the Proposed Action. Table I-6lists the four resources outside of the marine APE and the 14 marine archaeological resources not recommended to be historic properties.

Table I-5. Potentially NRHP-eligible marine archaeological resources identified in the marine APE

Resource ID	Potential Source	Location	Location in Marine APE	Finding of Effect
Target 20-02	Unknown shipwreck	U.S. OCS	Lease Area	No effect (will be avoided)
Target 21-01	Unknown shipwreck	U.S. OCS	Lease Area	Adverse effect
Target 21-02	Unknown objects	U.S. OCS	Lease Area	No effect (will be avoided)
Target 21-03	Unknown shipwreck	U.S. OCS	Lease Area	No effect (will be avoided)
Target 20-03	Unknown shipwreck	Massachusetts State	Falmouth ECC	No effect (will be avoided)
Potential NOAA 7840	Known shipwreck *Kershaw*	Massachusetts State	Falmouth ECC	No effect (will be avoided)
Target 20-04	Unknown shipwreck	Massachusetts State	Falmouth ECC	No effect (will be avoided)
Target 20-05	Unknown shipwreck	Massachusetts State	Falmouth ECC	No effect (will be avoided)
Target 20-07	Known shipwreck NOAA 9820	Massachusetts State	Falmouth ECC	No effect (will be avoided)
Target 20-08	Unknown shipwreck	Massachusetts State	Falmouth ECC	No effect (will be avoided)
Target 20-09	Disarticulated debris	Massachusetts State	Falmouth ECC	No effect (will be avoided)
Target 20-10	Unknown shipwreck	Massachusetts State	Falmouth ECC	No effect (will be avoided)
Target 20-11	Unknown shipwreck	Massachusetts State	Falmouth ECC	No effect (will be avoided)

Resource ID	Potential Source	Location	Location in Marine APE	Finding of Effect
Potential AWOIS 9821	Known shipwreck *Sagamore*	Massachusetts State	Falmouth ECC	No effect (will be avoided)
Target 20-12	Unknown shipwreck	Massachusetts State	Falmouth ECC	No effect (will be avoided)
Target 20-13	Unknown shipwreck	Massachusetts State	Falmouth ECC	No effect (will be avoided)
Target 20-14	Unknown debris	Massachusetts State	Falmouth ECC	No effect (will be avoided)
Target 21-04	Unknown object	Massachusetts State	Falmouth ECC	No effect (will be avoided)
Target 21-05	Unknown shipwreck	Massachusetts State	Falmouth ECC	No effect (will be avoided)
Target 21-06	Unknown shipwreck	Massachusetts State	Falmouth ECC	No effect (will be avoided)
Target BP-03	Disarticulated debris	Rhode Island State	Brayton Point ECC	No effect (will be avoided)
Target BP-04	Unknown shipwreck	Rhode Island State	Brayton Point ECC	No effect (will be avoided)
Target BP-05	Unknown shipwreck	Rhode Island State	Brayton Point ECC	No effect (will be avoided)
Target BP-09	Unknown shipwreck	Rhode Island State	Brayton Point ECC	No effect (will be avoided)
Target BP-11	Unknown object	Rhode Island State	Brayton Point ECC	No effect (will be avoided)
Target BP-12	Known shipwreck NOAA 13323	Rhode Island State	Brayton Point ECC	No effect (will be avoided)
Target BP-13	Known shipwreck NOAA 13324	Rhode Island State	Brayton Point ECC	No effect (will be avoided)
Target BP-14	Known shipwreck NOAA 13322	Rhode Island State	Brayton Point ECC	No effect (will be avoided)
Target BP-18	Unknown object	Rhode Island State	Brayton Point ECC	No effect (will be avoided)
Target BP-19	Unknown debris	Rhode Island State	Brayton Point ECC	No effect (will be avoided)
Target BP-20	Unknown shipwreck	Rhode Island State	Brayton Point ECC	No effect (will be avoided)
Target BP-21 (Swn-Ha-20)	Known shipwreck *Offshore Berth Area Potential Shipwreck Target*	Massachusetts State	Brayton Point ECC	No effect (will be avoided)

Source: COP, Appendix Q; SouthCoast Wind 2024.
ID = identification

Table I-6. Marine archaeological resources identified in SouthCoast Wind's investigations that are no longer in the marine APE or are not considered historic properties

Resource ID	Potential Source	Location	Location in Marine APE	Finding of Effect
Target 20-01	Unknown shipwreck	U.S. OCS	Outside marine APE (near Lease Area)	No effect (outside APE)
N/A	Known shipwreck *Rebecca Mary*	U.S. OCS	Lease Area	Not applicable
Target 20-06	Unknown shipwreck	U.S. OCS	Outside marine APE (near Falmouth ECC)	No effect (outside APE)
N/A	Known shipwreck *Darnoc*	Massachusetts State	Outside marine APE (near Falmouth ECC)	No effect (outside APE)
Target BP-01	Unknown shipwreck	U.S. OCS	Brayton Point ECC	Not applicable
Target BP-02	Unknown shipwreck	U.S. OCS	Outside marine APE (near Brayton Point ECC)	No effect (outside APE)
Target BP-06	Unknown objects	Rhode Island State	Brayton Point ECC	Not applicable
Target BP-07	Unknown shipwreck	Rhode Island State	Brayton Point ECC	Not applicable
Target BP-08	Unknown shipwreck	Rhode Island State	Brayton Point ECC	Not applicable
Target BP-10	Unknown shipwreck	Rhode Island State	Brayton Point ECC	Not applicable
Target BP-15	Unknown shipwreck	Rhode Island State	Brayton Point ECC	Not applicable
Target BP-16	Unknown shipwreck or boulder	Rhode Island State	Brayton Point ECC	Not applicable
Target BP-17	Unknown lobster traps or debris	Rhode Island State	Brayton Point ECC	Not applicable
Target BP-22	Unknown shipwreck	Massachusetts State	Brayton Point ECC	Not applicable
Target BP-23	Unknown object	Massachusetts State	Brayton Point ECC	Not applicable
Target BP-24	Unknown shipwreck	Massachusetts State	Brayton Point ECC	Not applicable
Target BP-25	Unknown shipwreck	Massachusetts State	Brayton Point ECC	Not applicable
Target BP-26	Unknown shipwreck	Massachusetts State	Brayton Point ECC	Not applicable

Notes: Resources for which the finding of effect has been marked as "Not applicable" are those resources that have been recommended not eligible for listing in the NRHP.
Source: COP, Appendix Q; SouthCoast Wind 2024.
ID = identification

The severity of effects would depend on the extent to which integral or significant components of the affected marine archaeological resource are disturbed, damaged, or destroyed, resulting in the loss of contributing elements to the historic property's eligibility or potential eligibility for listing in the NRHP. Avoidance buffers for the marine archaeological resources that are historic properties in the marine APE are stipulated in the MOA as a result of consultations (Attachment A). The avoidance buffers for these historic properties were determined using several factors in a process developed by SouthCoast Wind's Qualified Marine Archaeologist (QMA). Those resources with a small visual footprint (i.e., <16.4 feet [<5 meters]) are to be protected by an avoidance buffer comprising a minimum 165-foot (50-meter) radius (84,539.54 ft^2 [7,853.98 $meters^2$]) extending from the target's centroid. Those with a larger visual

footprint are to be protected by an avoidance buffer comprising a 164-foot (50-meter) buffer established off of all extant features, typically creating an ellipsoid or polygon-shaped avoidance area. Avoidance buffers recommended for each resource may contain contributing elements to the NRHP eligibility of the resources.

The SouthCoast Wind Project would avoid 31 of the 32 marine archaeological resources in the marine APE that are historic properties eligible for listing in the NRHP; therefore, the undertaking would have no effect on these resources. Measures to avoid the 31 marine archaeological resources, including specific avoidance buffers with which the Lessee is required to comply, are stipulated in the MOA. The SouthCoast Wind Project would not avoid the remaining marine archaeological resource (i.e., 21-01; Table I-5). As such, BOEM finds this marine archaeological resource would be subject to adverse effects from the undertaking. On September 27, 2024, the Lessee conducted a remotely operated vehicle (ROV) survey of marine archaeological resource 21-01. The ROV survey determined that marine archaeological resource 21-01 is in a high-energy, high-current environment and the historic property is currently buried just beneath the seafloor surface.

The MOA includes a stipulation requiring the Lessee to prepare a monitoring plan for marine archaeological resource 21-01 for the duration of the lease that will encompass construction, post-construction, and periodic inspections of the historic property. BOEM will use the procedures in MOA Stipulation VI (Review Process for Documents Produced Under MOA Stipulations) to consult with the signatories, Tribal Nations, and consulting parties on the monitoring plan. Refer to Table I-5 for BOEM's finding of effect for each marine archaeological resource in the marine APE and Attachment A for a draft of the MOA as of September 30, 2024.

Ancient Submerged Landform Features

ASLFs may be individually eligible for listing in the NRHP or considered contributing elements to a TCP eligible for listing in the NRHP. ASLFs in the marine APE are considered archaeologically sensitive. Although the marine geophysical remote-sensing studies performed to identify historic properties did not find direct evidence of pre-Contact Native American cultural materials, they represent a good-faith effort to identify submerged historic properties in the APE potentially affected by the undertaking, as defined at 36 CFR 800.4. If undiscovered archaeological resources are present within the identified ASLFs and they retain sufficient integrity, these resources could be eligible for listing in the NRHP under Criterion D. Furthermore, ASLFs are considered by Native American Tribes in the region to be culturally significant resources as the lands where their ancestors lived and as locations where events described in Tribal histories occurred prior to inundation. In addition, BOEM recognizes these landforms are similar to features previously determined to be TCPs and that are presumed to be eligible for listing in the NRHP under Criterion A.

SouthCoast Wind's marine geophysical archaeological surveys and geoarchaeological core processing identified 16 geomorphic features representing potential ASLFs (6). Of this total, nine are in the marine APE: one in the Lease Area, four in the Falmouth ECC, and four in the Brayton Point ECC (COP, Appendix Q; SouthCoast Wind 2024). The seven other identified ASLFs are below the maximum vertical extent of

the marine APE; therefore, BOEM anticipates the Proposed Action will have no effect on these resources. In addition to the archaeological potential of ASLFs, a number of the identified landforms along the Falmouth ECC may be contributing elements to one or more TCPs, including the Nantucket Sound TCP (Section I.3.1.4, *Assessment of Effects on Historic Properties Located in Multiple Portions of the APE*). The extent of marine cultural investigations performed for the Proposed Action does not enable conclusive determinations of eligibility for listing identified resources in the NRHP; as such, all identified ASLFs are considered eligible for the purposes of this assessment and, therefore, historic properties. Additional archaeological surveys or analyses, if completed, may enable more refined assessments of integrity, significance, and eligibility for listing these resources in the NRHP.

Table I-7. ASLFs identified in SouthCoast Wind's investigations

Resource ID	Location	Location in Marine APE	Finding of Effect
LA-P-20-01	U.S. OCS	Lease Area	Adverse effect
FM-P-20-01	Massachusetts State	Outside marine APE (near Falmouth ECC)	No effect (outside APE)
FM-P-21-01A	Massachusetts State	Outside marine APE (near Falmouth ECC)	No effect (outside APE)
FM-P-21-01B	Massachusetts State	Outside marine APE (near Falmouth ECC)	No effect (outside APE)
FM-P-21-01C	Massachusetts State	Outside marine APE (near Falmouth ECC)	No effect (outside APE)
FM-P-21-02	Massachusetts State	Outside marine APE (near Falmouth ECC)	No effect (outside APE)
FM-P-21-03	Massachusetts State	Outside marine APE (near Falmouth ECC)	No effect (outside APE)
FM-P-21-04A	Massachusetts State	Falmouth ECC	No effect (will be avoided)
FM-P-21-04B	Massachusetts State	Falmouth ECC	No effect (will be avoided)
FM-P-21-05	Massachusetts State	Falmouth ECC	No effect (will be avoided)
FM-P-21-06	Massachusetts State	Outside marine APE (near Falmouth ECC)	No effect (outside APE)
FM-P-21-07	Massachusetts State	Falmouth ECC	No effect (will be avoided)
BP-P-21-01A	Massachusetts State	Brayton Point ECC	No effect (will be avoided)
BP-P-21-01B	Massachusetts State	Brayton Point ECC	No effect (will be avoided)
BP-P-21-02	Rhode Island State	Brayton Point ECC	Adverse effect
BP-P-21-03	Rhode Island State	Brayton Point ECC	No effect (will be avoided)

Source: COP, Appendix Q; SouthCoast Wind 2024.
ECC = export cable corridor; ID = identification.

The severity of effects would depend on the extent to which integral or significant components of the affected ASLF are disturbed, damaged, or destroyed, resulting in the loss of contributing elements to the historic property's eligibility for listing in the NRHP. Resource-specific minimum avoidance areas for ASLFs are stipulated in the MOA as a result of consultations (Attachment A).

SouthCoast Wind has presently committed to avoiding seven of the nine ASLFs in the marine APE, and therefore, the undertaking would have no effect on these resources. BOEM finds that two ASLFs would be subject to adverse effects from the undertaking. Mitigation measures to resolve adverse effects on these resources have been determined through consultations and are stipulated in the MOA. Refer to Table I-7 for BOEM's finding of effect for each ASLF and Attachment A for a draft of the MOA as of September 30, 2024.

Nantucket Sound TCP

SouthCoast Wind's cultural resource background research identified the Nantucket Sound TCP in and potentially affected by Project activities occurring in the marine APE (COP, Appendix Q; SouthCoast Wind 2024). However, this TCP was also identified in the visual APE for Offshore Project components (COP, Appendices S; SouthCoast Wind 2024). As such, BOEM's assessment of effects on this historic property can be found in Section I.3.1.4, *Assessment of Effects on Historic Properties Located in Multiple Portions of the APE*.

I.3.1.2 Assessment of Effects on Historic Properties in the Terrestrial APE

Cultural resource investigations completed for the Proposed Action identified historic properties in the terrestrial APE (COP, Appendix R; SouthCoast Wind 2024). Based on the information presented below, BOEM finds historic properties would be adversely affected in the terrestrial APE.

Terrestrial Archaeological Resources

As of November 2023, SouthCoast Wind's investigations have identified two terrestrial archaeological resources in the terrestrial APE (Table I-8; COP, Appendix R; SouthCoast Wind 2024), which are recommended to be eligible for listing in the NRHP under Criteria A and D, and BOEM is treating them as historic properties. Terrestrial archaeological investigations have not been fully completed in the terrestrial APE. As such, potential, presently undiscovered terrestrial archaeological resources may be present in the terrestrial APE and subject to adverse effects from the Proposed Action; these may be identified during SouthCoast Wind's process of phased identification and evaluation of historic properties (COP, Appendix R.2; SouthCoast Wind 2024; Section I.5, *Phased Identification and Evaluation*). The terrestrial APE also intersects the NRHP-listed Mount Hope Bridge boundary as defined by the U.S. National Park Service (NPS); further discussion of this historic property is provided in the *Historic Aboveground Resources* section below. BOEM anticipates that the number of identified terrestrial archaeological resources and historic properties in the terrestrial APE may be refined through the phased identification process and ongoing Section 106 consultations.

Table I-8. Terrestrial archaeological resources in the terrestrial APE

Resource ID	Cultural Component	Location in Terrestrial APE	Finding of Effect
RI-2816	Indeterminate pre-Contact Native American	Aquidneck Island, Portsmouth, Rhode Island	Adverse effect
RI-2817	Indeterminate pre-Contact Native American, possibly Transitional Archaic or Middle Woodland	Aquidneck Island, Portsmouth, Rhode Island	Adverse effect

Source: COP, Appendix R; SouthCoast Wind 2024.
APE = area of potential effect; ID = identification.

The severity of effects would depend on the extent to which integral or significant components of the affected terrestrial archaeological resource are disturbed, damaged, or destroyed, resulting in the loss of contributing elements to the historic property's eligibility for listing in the NRHP. Avoidance of the two known terrestrial archaeological resources has been recommended. If avoidance is not feasible, mitigation in the form of data recovery excavation in portions of the sites that cannot be avoided; installation of temporary site protective fencing prior to the start of construction; identifying the sensitive resource areas to construction work crews as areas where no ground-disturbing activities can take place; and archaeological construction monitoring has been recommended (COP, Appendix R; SouthCoast Wind 2024; MOA, Attachment 7). SouthCoast Wind has committed to monitoring during construction in areas determined to have a moderate to high potential for undiscovered archaeological resources (COP Volume 2, Table 16-1 and Appendix R.3; SouthCoast Wind 2024).

Phased identification as defined in 36 CFR 800.4(b)(2) will be used for the areas of the terrestrial APE identified in the Terrestrial Archaeology Phased Identification Plan (Attachment 12 of the MOA). Completion of Phase IB archaeological surveys during the phased identification process may lead to the identification of archaeological resources in the terrestrial APE. As such, the undertaking is currently anticipated to have adverse effects on the two known terrestrial archaeological resources identified in the terrestrial APE. The identification of other terrestrial archaeological resources in the terrestrial APE is possible in the completion of the phased identification process. BOEM will use the MOA to establish commitments for reviewing the sufficiency of any supplemental terrestrial archaeological investigations; assessing effects on historic properties; and implementing measures to avoid, minimize, or mitigate effects in these areas prior to construction. For additional details, refer to Section I.5, *Phased Identification and Evaluation*, and Attachment A for a draft of the MOA as of September 30, 2024.

Historic Aboveground Resources

One historic aboveground resource listed in the NRHP has been identified in the terrestrial APE: the Mount Hope Bridge (COP, Appendix R; SouthCoast Wind 2024). The terrestrial APE intersects the Mount Hope Bridge boundary as defined by NPS; however, the structure itself is not subject to physical adverse effects from the Proposed Action, and the Mount Hope Bridge has been determined to be significant and eligible for listing in the NRHP unrelated to potential archaeological elements. As such, BOEM determined the Project would have no effect on this historic property.

I.3.1.3 Assessment of Effects on Historic Properties in the Visual APE

Cultural resource investigations completed for the Proposed Action have identified historic properties in the visual APE (COP, Appendices S and S.1; SouthCoast Wind 2024). Based on the information presented below, BOEM finds historic properties would be adversely affected in the visual APE.

Review of the visual APE for Offshore Project components identified 11 historic aboveground resources and three TCPs (i.e., Chappaquiddick Island, Nantucket Sound, and Vineyard Sound and Moshup's Bridge) that would have views of the Project components. Review of the visual APE for Onshore Project components identified a total of 13 historic aboveground resources in Falmouth and Brayton Point, of which two would have views of the Onshore Project components in Falmouth. BOEM determined that four aboveground historic properties would experience adverse effects from the visibility of Project components (Table I-9).

The MOA stipulates that SouthCoast Wind will implement an Aircraft Detection Lighting System (ADLS) for aviation safety lighting on Offshore Project components (e.g., WTGs and OSPs). During operation of Offshore Project components, an ADLS would be activated for less than 5 hours per year, or 0.1 percent of nighttime hours, compared to standard continuous Federal Aviation Administration hazard lighting (COP Appendix T, Section 5.1.3; SouthCoast Wind 2024). When ADLS is not activated during construction and decommissioning, effects from lighting on Offshore Project components would be localized and range from temporary to short term. As a result, BOEM anticipates implementation of an ADLS will reduce nighttime visual effects on aboveground historic properties.

Table I-9. Adversely affected aboveground historic properties in the visual APE

Resource Name	Portion of Visual APE	Distance to Nearest WTG [a]	NRHP Status
Chappaquiddick Island TCP	Offshore Project components	30.8 miles	Eligible
Nantucket Historic District	Offshore Project components	23.4 miles	National Historic Landmark
Nantucket Sound TCP	Offshore Project components	25.1 miles	Eligible
Oak Grove Cemetery	Onshore Project components	N/A	Eligible

[a] For the Proposed Action.

Chappaquiddick Island TCP

Chappaquiddick Island TCP is located 30 miles (48.2 kilometers) north of the Lease Area at the eastern end of Martha's Vineyard. It is connected to the main island by a narrow barrier beach that is often breached by storms and winds (Epsilon Associates, Inc. 2020 as cited in the COP, Appendix S:3-10; SouthCoast Wind 2024). The landscape of this undeveloped island is largely scrub oak, pitch pines, oak trees, and red cedars that are up to approximately 20 feet (6.1 meters) tall (COP, Appendix S:3-10; SouthCoast Wind 2024).

The historic Chappaquiddick branch of the Wampanoag Tribe inhabited the island into the nineteenth century and currently are settled on a 100-acre (40-hectare) reservation within the island's brush land interior (Chappaquiddick Tribe, 2022, as cited in the COP, Appendix S:3-10; SouthCoast Wind 2024). In May and June 2019, the non-federally recognized historic Massachusetts Chappaquiddick Tribe of Wampanoag Nation notified BOEM of potential impacts on Chappaquiddick Island resulting from the Vineyard Wind project (BOEM 2019). As a result, Chappaquiddick Island was determined by BOEM to be potentially eligible for listing in the NRHP as a TCP.

Chappaquiddick Island TCP retains its maritime setting and continues to offer significant seaward views that support the integrity of this setting, which contributes to this resource's NRHP eligibility. Those seaward views include vantage points with the potential for an unobstructed view from contributing resources toward the Offshore Project components. Introduction of the WTGs and OSPs into the seascape horizon of the Chappaquiddick Island TCP would result in an adverse visual effect on the viewshed and maritime setting. Simulated conditions of the south shore of the island Wasque Point, Wasque Reservation, and Wasque Avenue Key Observation Points (KOP) revealed potential weak to moderate visual change to the island; the greatest visual change was found at the Wasque Avenue KOP (COP, Appendix S; SouthCoast Wind 2024). The intensity of the visual effect depends on blade movement, differing atmospheric conditions, and lighting. Based on this assessment, the introduction of Offshore Project components would result in a change to the unobstructed ocean viewshed of the TCP and would potentially compromise the setting of the TCP, which is a key character-defining feature. As a result, the Project would result in an adverse effect on the Chappaquiddick Island TCP.

As described in the *SouthCoast Wind Cumulative Historic Resources Visual Effects Analysis*, the Chappaquiddick Island TCP is 30.8 miles (49.6 kilometers) from the nearest WTG associated with the proposed Project and 14.7 miles (23.7 kilometers) from the nearest potential WTG location for other wind energy development activities. The total number of potentially visible WTGs is 679. Of these, 86 theoretically visible WTGs (12.66 percent) would be from the proposed Project. As such, BOEM determined the Project would add to the cumulative visual effects on the Chappaquiddick Island TCP when combined with the effects of other past, present, or reasonably foreseeable future actions (BOEM 2023).

Nantucket Historic District NHL

Nantucket Historic District is located 22.3 miles (35.9 kilometers) north of the Lease Area and encompasses Tuckernuck Island, Muskeget Island, and Nantucket Island. Nantucket Island is a well-preserved New England seaport, which retains intact buildings dating to the eighteenth and nineteenth centuries, when the whaling industry provided the primary source of commerce in the town. Economic decline on the island is largely responsible for the survival of excellent and intact architectural resources from the Colonial, Federal, Greek Revival, and Victorian periods. Preservation of these resources, and the island's location off the coast of Cape Cod, led to its significance as an early vacation resort. Tuckernuck Island contains a small collection of nineteenth and twentieth century buildings. Like Nantucket Island, this island is known for its nineteenth century architecture and benefited from the rise of the whaling industry. Muskeget Island contains only one building, a circa 1910 former Coast Guard

boathouse, which is used as a summer residence. The Nantucket Historic District includes dense residential development from the era of whaling, residential development associated with tourism, grassy public parcels and lawns, undeveloped barren areas with grasslands, heathlands and salt marshes, scrub oak, deciduous trees, and barrens of pitch pine barrens that are up to 40 feet (12.2 meters) tall (COP, Appendix S:3-7; SouthCoast Wind 2024).

The Nantucket Historic District was determined to be an NHL and was listed in the NRHP in November 1966. In October 2012, the NHL nomination was updated and the historic district boundaries were expanded from just Nantucket Island to include Tuckernuck and Muskeget Islands. The district is significant under NRHP Criterion A/NHL Criterion 1 for its association with the whaling industry in New England; NRHP Criterion C/NHL Criterion 4 for the array of well-preserved resources reflecting a range of architectural styles and eras; and NRHP Criterion D for important cultural and historical data it has yielded or may yield. The period of significance begins in 1650 with the origination of the whaling industry, through the industry's demise in 1849, and spans to 1975 to include the period in which it emerged and thrived as a summer resort (Chase-Herrill and Pfeiffer 2012 as cited in COP, Appendix S:3-7; SouthCoast Wind 2024). Character-defining features of Nantucket Historic District include the collection of well-preserved buildings from Colonial, Federal, Greek Revival, and Victorian periods; the maritime setting of the district as an important whaling center with a high concentration of buildings, both simple and elaborate, oriented toward shorelines, harbors, and ocean vistas; and unobstructed views of the ocean from locations throughout the island. As a collection of resources that are united historically and aesthetically by plan and physical development, setting is an important character-defining feature of the historic district's integrity (COP, Appendix S:3-7; SouthCoast Wind 2024).

The Nantucket Historical Commission maintains a list of contributing and noncontributing resources within the district; this list contains 3,782 properties that are classified as either contributing, noncontributing, or some combination. Within the PAPE, there are 1,822 contributing properties are contributing, 1,108 noncontributing properties, and 852 properties that are either vacant or uncategorized (COP, Appendix S:3-7; SouthCoast Wind 2024).

Nantucket Historic District retains its maritime setting and continues to offer significant seaward views that support the integrity of this setting, which contributes to this resource's NRHP eligibility. Those seaward views include vantage points with the potential for an unobstructed view from contributing resources toward the Offshore Project components. Introduction of the WTGs and OSPs into the seascape horizon of the District would result in an adverse visual effect upon the viewshed and setting. Simulated conditions, particularly along the south shore of the island at historic locations, such as Tom Nevers Field and Miacomet Beach, revealed potential moderate visual change from some areas of the district, and moderate to major visual changes in other places, such as Cisco Beach and the Hummock Pond Road Bike Path. The intensity of the visual effect depends on blade movement, differing atmospheric conditions, and lighting. Based on this assessment, the introduction of Offshore Project components would result in a change to the unobstructed ocean viewshed of the district, would potentially compromise the setting of the district and its contributing resources, which is one of its key character-defining features. As a result, the Project would result in an adverse effect on Nantucket Historic District (COP, Appendix S:3-7-3-8; SouthCoast Wind 2024).

As described in the *SouthCoast Wind Cumulative Historic Resources Visual Effects Analysis*, the Nantucket Historic District is 23.4 miles (37.7 kilometers) from the nearest WTG associated with the proposed Project and 14.8 miles (23.8 kilometers) from the nearest potential WTG location for other wind energy development activities. The total number of potentially visible WTGs is 743. Of these, 129 theoretically visible WTGs (17.36 percent) would be from the proposed Project. As such, BOEM determined the Project would add to the cumulative visual effects on the Nantucket Historic District when combined with the effects of other past, present, or reasonably foreseeable future actions (BOEM 2023).

Nantucket Sound TCP

SouthCoast Wind's cultural resource background research identified the Nantucket Sound TCP in and potentially affected by Project activities occurring in the visual APE for Offshore Project components (COP, Appendix S; SouthCoast Wind 2024). However, this TCP was also identified in the marine APE (COP, Appendices Q; SouthCoast Wind 2024). As such, BOEM's assessment of effects on this historic property can be found in Section I.3.1.4, *Assessment of Effects on Historic Properties Located in Multiple Portions of the APE*.

Oak Grove Cemetery (Falmouth, Massachusetts)

The Oak Grove Cemetery was established circa 1850. It encompasses 18.9 acres and consists of 35 contributing resources. The landscape includes manicured lawns and native plantings under an open canopy of deciduous and evergreen trees that are up to 40 feet tall. The cemetery exhibits a mix of the ideals of the rural/garden cemetery movement and the more geometric configuration of formal nineteenth century community cemeteries. The Oak Grove Cemetery was determined to be eligible for listing in the NRHP in 2014. The cemetery is significant under Criterion A for its association with the history of the town of Falmouth and is the town's largest nineteenth century cemetery. It is also significant under Criterion C as a well-preserved local example of both a nineteenth century rural and formal cemetery. The period of significance of the resource area is 1850 to 1964. Character-defining features of the cemetery include the layout and landscape, greenspace, and myriad markers. As a cemetery that is significant for its association with the rural cemetery movement, which sought to create a pastoral park-like environment, the setting is an important characteristic feature of the resource (COP, Appendix S:3-22; SouthCoast Wind 2024).

The Oak Grove Cemetery retains its rural setting, which contributes to its NRHP eligibility. From the cemetery, views toward the Falmouth Onshore Project components would be possible. The Oak Grove Cemetery is located immediately approximately 0.1 mile west of the Lawrence Lynch substation site and 3.34 miles from the Cape Cod Aggregates Substation site. Distance, vegetation, and other buildings partially obstruct views of the Cape Cod Aggregates Substation site from the cemetery. Though there is some vegetation between the historic property and the Lawrence Lynch substation site, the historic property is immediately adjacent and would have a view of the substation building along its eastern edge. In addition, there is the potential for short-term, temporary auditory effects due to construction activities. As a rural, garden-style cemetery that was designed to provide a natural sanctuary for

mourners, setting is a character-defining feature of its significance. The cemetery would experience a long-term visual change in setting due to the construction of the Lawrence Lynch substation. The introduction of a new, modern visual element has the potential to compromise the rural and contemplative setting, affecting its ability to convey significance. As a result, the Project would have an adverse effect on the Oak Grove Cemetery if the Falmouth ECC were used (COP, Appendix S:3-22; SouthCoast Wind 2024).

I.3.1.4 Assessment of Effects on Historic Properties Located in Multiple Portions of the APE

The historic property discussed in this section has been identified within multiple portions of the APE and, as such, is subject to both physical and visual effects.

Nantucket Sound TCP

In 2009, MHC determined Nantucket Sound was eligible for listing in the NRHP as a TCP under Criterion D in recognition of the high potential for preserved cultural areas (Simon 2009 as cited in the COP, Appendix Q:32; SouthCoast Wind 2024). Per Criterion D, Nantucket Sound was found to yield and have the potential to yield valuable information related to pre-Contact Cape Cod and its surrounding islands (NPS 1995, 2010 as cited in the COP, Appendix Q:44; SouthCoast Wind 2024). ASLFs identified through SouthCoast Wind's marine geophysical archaeological surveys within or in proximity to the Nantucket Sound may be contributing elements to the TCP's eligibility for listing in the NRHP.

By approximately 17,000 calibrated years Before Present (cal BP), the Laurentide Ice Sheet had retreated to the north shore of Cape Cod, and the southward draining braided streams deposited sediments on a glacial outwash plain. As the stream system migrated laterally south of the retreating ice front, glacial lakes along the coastal plain were buried beneath the prograding outwash. However, some glacial lakes may have drained southward into the Lease Area by way of water gaps between Nantucket and Martha's Vineyard before they were buried (Gutierrez et al. 2003 as cited in the COP, Appendix Q:31; SouthCoast Wind 2024). As late as 15,000 cal BP, the southern edge of the continental ice sheet still extended as far south as Cape Cod. At that time, sea stands were as much as 300 feet (91.5 meters) lower than present levels; now-inundated areas of the sea floor were exposed and potentially open to human habitation (Daley 2005 as cited in the COP, Appendix Q:31; SouthCoast Wind 2024). However, by cal 13,000 BP, as the climate moderated, most of southeastern New England was ice free (Raposa 2009 and Plymouth Archaeological Research Project [PARP] 2016 as cited in the COP, Appendix Q:31; SouthCoast Wind 2024). Sediment cores taken in Nantucket Sound in water depths of between 30 feet (9.1 meters) and 50 feet (15.2 meters) below mean sea level (MSL) demonstrated that the region surrounding Massachusetts' offshore islands once incorporated deciduous forests, wetlands, and swamps (Daley 2005 and Simon 2009 as cited in the COP, Appendix Q:31–32; SouthCoast Wind 2024).

Warming climatic conditions combined with isostatic rebound of the land mass resulted in rising sea levels that inundated exposed and potentially habitable landscapes (Bright et al. 2013:31 and Mahlstedt 2007a:24 as cited in the COP, Appendix Q:32; SouthCoast Wind 2024). Most of Nantucket Sound and the adjacent Vineyard Sound were submerged by 8,000 cal BP (Dunford 1999:43 as cited in the COP,

Appendix Q:32; SouthCoast Wind 2024). Despite this trend, the potential for intact early archaeological resources on or beneath the seafloor in this area is generally high.

A number of the ASLFs identified by SouthCoast Wind along the Falmouth ECC may be contributing elements to the Nantucket Sound TCP. The Falmouth ECC runs through Muskeget Channel into Nantucket Sound in Massachusetts state waters to make landfall in Falmouth, Massachusetts. SouthCoast Wind has presently committed to avoiding the four ASLFs located in the Falmouth ECC portion of the marine APE (i.e., FM-P-21-04A, FM-P-21-04B, FM-P-21-05, and FM-P-21-07) and therefore there would be no effect on these resources. As such, BOEM has concluded that the Project would not result in physical effects on ASLFs that are contributing elements to the Nantucket Sound TCP.

BOEM has concluded that the Project would result in an adverse *visual* effect on the Nantucket Sound TCP. In addition to being determined eligible under Criterion D, the TCP is significant under Criterion A and Criterion C. (COP, Appendix S:3-9; SouthCoast Wind 2024). Nantucket Sound TCP retains its maritime setting and continues to offer significant seaward views that support the integrity of this setting, which contributes to this resource's NRHP eligibility. Those seaward views include vantage points with the potential for an unobstructed view from contributing resources toward the Offshore Project components. As a result of the introduction of modern, intrusive elements associated with the Offshore Project components, the Nantucket Sound TCP would experience visual adverse effects.

As described in the *SouthCoast Wind Cumulative Historic Resources Visual Effects Analysis*, the Nantucket Sound TCP is 25.1 miles (40.4 kilometers) from the nearest WTG associated with the proposed Project and 14.3 miles (23.0 kilometers) from the nearest potential WTG location for other wind energy development activities. The total number of potentially visible WTGs is 744. Of these, 129 theoretically visible WTGs (17.33 percent) would be from the proposed Project. As such, BOEM determined the Project would incrementally add to the cumulative visual effects on the Chappaquiddick Island TCP when combined with the effects of other past, present, or reasonably foreseeable future actions (BOEM 2023).

I.3.2 Summary of Adversely Affected Historic Properties

I.3.2.1 Adverse Effects on Historic Properties in the Marine APE

The Project would have no adverse effect on 31 of 32 marine archaeological resources, and seven of nine ASLFs in the marine APE due to SouthCoast Wind's commitment to avoidance of these historic properties. However, the Project would have adverse effects on one marine archaeological resource and two ASLFs in the marine APE. Mitigation measures to resolve adverse effects on these resources will be determined through consultations and will be stipulated in the MOA. Refer to Attachment A for a draft of the MOA as of September 30, 2024.

I.3.2.2 Adverse Effects on Historic Properties in the Terrestrial APE

The Project would have adverse effects on known historic properties in the terrestrial APE: two terrestrial archaeological resources. Avoidance has been recommended for these two historic

properties; avoidance of a historic property would result in no effect on the historic property. However, development of the final Project design is ongoing, and it is currently unclear whether SouthCoast Wind would be able to avoid adverse effects. If avoidance is not feasible, mitigation in the form of data recovery, excavation in portions of the sites that cannot be avoided; installation of temporary site protective fencing prior to the start of construction; identifying the sensitive resource areas to construction work crews as areas where no ground-disturbing activities can take place; and archaeological construction monitoring has been recommended (COP, Appendix R; SouthCoast Wind 2024). Therefore, BOEM has determined the undertaking would have adverse effects on historic properties in the terrestrial APE.

Additional terrestrial archaeological resources, of which all or some may be subject to adverse effects from the Project, may be identified during SouthCoast's process of phased identification and evaluation of historic properties as defined in 36 CFR 800.4(b)(2) (Section I.5, *Phased Identification and Evaluation*). BOEM has used the MOA to establish commitments for reviewing the sufficiency of any supplemental terrestrial archaeological investigations as phased identification; assessing effects on historic properties; and implementing measures to avoid, minimize, or mitigate effects in these areas prior to construction. Refer to Section I.5, *Phased Identification and Evaluation*, and Attachment A for a draft of the MOA as of September 30, 2024.

I.3.2.3 Adverse Effects on Historic Properties in the Visual APE

Based on the information BOEM has available from the studies conducted to identify historic properties in the visual APE of the Project and the assessment of effects upon those properties determined in consultation with consulting parties, BOEM has found that the Proposed Action would have direct visual adverse effects on a total of three aboveground historic properties, including one NHL (Nantucket Historic District) within the visual APE for Offshore Project components (Table I-9). BOEM determined that one historic property within the visual APE for Onshore Project components would be adversely affected if the variant Falmouth ECC is used. The undertaking would introduce visual elements that are out of character with the historic setting that contributes to the historic properties' significance. However, BOEM has determined that, due to the distance and open viewshed between the historic properties and affecting Project components, the integrity of the historic properties would not be so diminished as to *disqualify* any of them from NRHP eligibility. The adverse effects on the viewshed of the aboveground historic properties would occupy the space for approximately 35 years, but they are unavoidable for reasons discussed in Section I.3.1.3, *Assessment of Effects on Historic Properties in the Visual APE*. This application of the Criteria of Adverse Effect and determination that the effects are direct are based on pertinent NRHP bulletins, subsequent clarification and guidance by ACHP and NPS, and other documentation, including professionally prepared viewshed assessments and computer-simulated photographs.

Where BOEM determined adverse visual effects would occur from Offshore Project components on historic properties, BOEM then assessed whether those effects would add to the potential adverse effects of other reasonably foreseeable actions and thereby result in cumulative effects, which are additive effects. Where BOEM found visual adverse effects on historic properties in the visual APE for

Offshore Project components (Table I-9), BOEM also determined that the undertaking would contribute to cumulative adverse effects (BOEM 2023).

I.4 Actions to Avoid, Minimize, or Mitigate Adverse Effects

As a requirement of COP approval, BOEM developed avoidance, minimization, or mitigation, and monitoring measures that would be implemented to avoid and resolve adverse effects on historic properties, including cumulative visual adverse effects to which the Project would be additive. These measures were developed through consultations and would be implemented through the execution of the MOA by BOEM and the required signatories in accordance with the NHPA Section 106 regulations (36 CFR 800) and in compliance with Section 110(f). This process considers all prudent and feasible alternatives to avoid adverse effects as discussed in Section I.4.1, *Alternatives Considered*, and included, to the maximum extent possible, taking such planning actions as may be necessary to minimize harm to any NHL that may be directly and adversely affected by an undertaking.

Simultaneous to the publication of the final EIS, BOEM will coordinate with signatories to the MOA to have the MOA fully signed and executed by December 19, 2024. The version of the MOA attached to this document as Attachment A is a draft of the MOA as of September 30, 2024. The fully executed MOA will be posted on BOEM's website at: https://www.boem.gov/renewable-energy/state-activities/southcoast-wind-formerly-mayflower-wind.

I.4.1 Alternatives Considered

BOEM's election to use NEPA substitution for the Section 106 review of the Project included the identification and evaluation of historic properties for the undertaking and assessment of effects for all the action alternatives identified during the NEPA review. BOEM's NEPA EIS and Section 106 reviews have analyzed six action alternatives (i.e., A through F; Table I-10) for impacts on cultural resources (Final EIS, Chapter 3, Section 3.6.2, *Cultural Resources*) and effects on historic properties as presented in this section. Table I-10also denotes Alternative D as BOEM's Preferred Alternative as identified in the Final EIS. Additional details on the action alternatives and Preferred Alternative can be found in Chapter 2 of the Final EIS.

Table I-10. Summary of alternatives analyzed in the Final EIS and Section 106 review

Alternative	Description
Alternative A – No Action Alternative	Under Alternative A, BOEM would not approve the COP, and the Project's construction and installation, operations and maintenance, and eventual decommissioning would not occur, and no additional permits or authorizations for the Project would be required. Any potential environmental and socioeconomic impacts, including benefits, associated with the Project as described under the Proposed Action would not occur. However, all other existing or other reasonably foreseeable future impact-producing activities would continue. The impact of the No Action Alternative serves as the baseline against which all action alternatives are evaluated.

Alternative	Description
Alternative B – Proposed Action	Under Alternative B, the construction, operations and maintenance, and conceptual decommissioning of the Project on the OCS offshore of Massachusetts would occur within the range of design parameters outlined in the SouthCoast Offshore Wind COP (SouthCoast Wind 2024), subject to applicable mitigation measures. The Project would have a capacity of up to 2,400 MW and would consist of up to 147 WTGs in the Lease Area, up to 5 OSPs and associated export cables. SouthCoast Wind would space WTGs in a 1-by-1-nautical-mile offset grid pattern (east–west-by-north–south-gridded layout). The Project would include one preferred ECC making landfall and interconnecting to the power grid at Brayton Point, in Somerset, Massachusetts, and one variant ECC making landfall and interconnecting to the power grid in Falmouth, Massachusetts. The ECC to Brayton Point would have an intermediate landfall on Aquidneck Island, Rhode Island.
Alternative C – Fisheries Habitat Impact Minimization	Under Alternative C, the construction, operations and maintenance, and eventual decommissioning of the Project on the OCS offshore Massachusetts would occur within the range of the design parameters outlined in the SouthCoast Wind COP, subject to applicable mitigation measures. However, the Project would include an onshore export cable route that would avoid placing the offshore export cable in the Sakonnet River to avoid impacts on fisheries habitats. Alternative C includes two possible onshore export cable routes. • Alternative C-1: Aquidneck Island, Rhode Island Route • Alternative C-2: Little Compton/Tiverton, Rhode Island Route
Alternative D – Nantucket Shoals (Preferred Alternative)	Under Alternative D, the construction, operations and maintenance, and eventual decommissioning of the Project on the OCS offshore Massachusetts would occur within the range of the design parameters outlined in the SouthCoast Wind COP, subject to applicable mitigation measures. However, up to 6 WTGs (AZ-47, BA-47, BB-47, BC-47, BF-48, and BF-49) would be eliminated in the northeastern portion of the Lease Area to reduce potential impacts on foraging habitat and potential displacement of wildlife from this habitat adjacent to Nantucket Shoals.
Alternative E – Foundation Structures	Under Alternative E, the construction and installation, operations and maintenance, and eventual decommissioning of the Project on the OCS offshore Massachusetts would occur within the range of the design parameters, which includes a range of foundation types (monopile, piled jacket, suction bucket, and gravity based), subject to applicable mitigation measures. This alternative includes three foundation options, which assume the maximum use of piled (monopile and piled jacket), suction bucket, and gravity-based foundation structures to assess the extent of potential impacts from each foundation type. • Alternative E-1: Piled Foundations (monopile and piled jacket) only • Alternative E-2: Suction Bucket Foundations only • Alternative E-3: Gravity-based Foundations only
Alternative F – Muskeget Channel Cable Modification	Under Alternative F, the construction, operations and maintenance, and eventual decommissioning of the Project on the OCS offshore Massachusetts would occur within the range of the design parameters outlined in the SouthCoast Wind COP, subject to applicable mitigation measures. However, to minimize seabed disturbance in the Muskeget Channel, the Falmouth offshore export cable route would use ±525kV HVDC cables connected to an HVDC converter station, instead of HVAC cables connected to offshore substations, and would only use up to 3 offshore export cables, instead of up to 5 offshore export cables.

I.4.1.1 Action Alternatives that Would Minimize the Adverse Effect of the Project

While some of the action alternatives and sub-alternatives identified for the Project may avoid, minimize, or mitigate adverse effects on some historic properties, no alternative that meets the purpose and need of Project development in the Lease Area would fully avoid adverse effects on historic properties, including visual effects on NHLs. BOEM's Preferred Alternative (Alternative D) would include up to six fewer WTGs (Table I-10). The Preferred Alternative is unlikely to lessen physical impacts on historic properties, and while it would reduce the number of Project components contributing to visual effects on historic properties, the number of eliminated WTGs is not anticipated to result in a substantial minimization of visual adverse effects. Overall, the adoption of the Preferred Alternative (Alternative D) would result in the same adverse effects on historic properties as the Proposed Action.

The following sections compare the other action alternatives to the Proposed Action and discuss which would avoid or minimize the adverse effect of the Project on historic properties. Additionally, as described in Section I.3.1, BOEM has considered the primary IPFs relevant to cultural resources (i.e., accidental releases, anchoring, cable emplacement and maintenance, gear utilization, land disturbance, lighting, noise, and presence of structures) in its assessment of the action alternatives' potential effects on historic properties as provided in the following subsections. Refer to Chapter 3, Section 3.6.2, *Cultural Resources,* of the Final EIS for additional details on each alternative as is applicable to cultural resources and historic properties and for NEPA analyses of the potential impacts of these alternatives on cultural resources, including BOEM's Preferred Alternative.

Minimization of Physical Effects on Historic Properties

The Proposed Action (Alternative B) is anticipated to have physical adverse effects on historic properties. Specifically, these include one marine archaeological resource, two ASLFs, and one TCP (i.e., the Nantucket Sound TCP) in the marine APE; and two terrestrial archaeological resources in the terrestrial APE.

Alternatives C, D, E, and F all involve a potential reduction in number or size of Offshore Project components that would be built for the Project, thereby reducing potential seabed-disturbing activities that could cause physical adverse effects on historic properties. The reduction in number or size of WTGs, OSPs, interlink cables, and export cables may minimize effects on one marine archaeological resource, two ASLFs, and one TCP depending on the locations of the removed components in relation to the specific locations of these historic properties. The marine archaeological resource and the ASLFs located within the area from which Offshore Project components would be removed would experience no or minimized effects from the Project. Additionally, removal of Offshore Project components under these alternatives would minimize potential physical adverse effects on presently undiscovered marine archaeological resources in these areas. However, while these alternatives may minimize adverse effects on some specific historic properties, they may also introduce adverse effects on others. A discussion of each alternative and sub-alternative is provided below.

Alternative C includes two sub-alternatives (C-1 and C-2) to analyze alternate onshore cable route options developed to avoid installation of a portion of the proposed Brayton Point Offshore Export Cable

that runs through the Sakonnet River (Figure I.B-15). Alternative C-1 includes a western and eastern onshore route variation on Aquidneck Island, Rhode Island.

Alternative C-1 (Aquidneck Island, Rhode Island Route) would result in full avoidance of adverse effects on one ASLF (i.e., BP-P-21-02) that is a historic property potentially eligible for listing in the NRHP. Alternative C-2 (Little Compton/Tiverton, Rhode Island Route) would also result in full avoidance of adverse effects on one ASLF (i.e., BP-P-21-02). BOEM would require SouthCoast Wind to uphold the same applicable commitments to avoid specific marine cultural resources should this alternative be adopted (refer to Attachment A for a draft of the MOA as of September 30, 2024). However, either sub-alternative may introduce adverse effects on currently unidentified but potential historic properties that may be present within a potential offshore ECC that would encompass this alternate route.

Additionally, for the Alternative C-1 cable route option overall, background research identified a total of 10 known terrestrial archaeological resources and 21 known historic aboveground resources, including six historic properties listed in the NRHP and six historic cemeteries (Table I-11; PAL 2022).[1] One of the terrestrial archaeological resources (RI-1587, Fairview Site) has been previously recommended not eligible for listing in the NRHP; however, because it is the only resource with such a recommendation, BOEM has included consideration of this resource in discussion here for the purposes of NHPA consultation. Adoption of Alternative C-1 using the western route variation would have potential adverse effects on nine terrestrial archaeological resources and 18 historic aboveground resources, including five historic properties listed in the NRHP and five historic cemeteries (PAL 2022). Adoption of Alternative C-1 using the eastern route variation would have potential adverse effects on seven known terrestrial archaeological resources and 15 known historic aboveground resources, including three historic properties listed in the NRHP and four historic cemeteries (PAL 2022). For Alternative C-2, background research identified three known terrestrial archaeological resources and 23 known historic aboveground resources, including four historic properties listed in the NRHP and eight historic cemeteries, that have the potential to be subject to adverse effects (Table I-12; PAL 2022). Overall, BOEM finds Alternative C is unlikely to minimize adverse effects on historic properties.

Table I-11. Cultural resources and historic properties subject to potential adverse effects from adoption of Alternative C-1 and its route variations

Resource ID or Name	Resource Type	NRHP Status	Alt. C-1 Route	
			West Variation	East Variation
Bailey Farm	Historic above.	Listed	X	
Boyd's Windmill	Historic above.	Listed	X	

[1] Rhode Island General Law [RIGL] 23-18-11 et seq. (State Cemeteries Act) conditionally prohibits any town or city from permitting "construction, excavation or other ground disturbing activity within twenty-five (25) feet of a recorded historic cemetery" unless the "boundaries of the cemetery are adequately documented and there is no reason to believe additional graves exist outside the recorded cemetery." As such, BOEM assumes historic cemeteries within 25 feet (7.6 meters) of the Project would be subject to adverse impacts without the adoption of AMMs.

Resource ID or Name	Resource Type	NRHP Status	Alt. C-1 Route	
			West Variation	East Variation
Cory Farm	Historic above.	Poten. eligible	X	X
David Albro Farm	Historic above.	Poten. eligible	X	
Dennis House	Historic above.	Poten. eligible	X	X
Newton HD	Historic above.	Eligible	X	X
Paradise Rocks HD	Historic above.	Eligible	X	X
Paradise School	Historic above.	Listed	X	
Peabody School	Historic above.	Eligible		X
Portsmouth Friends Meeting House/ Parsonage & Cemetery	Historic above.	Listed	X	X
Rural Estates HD	Historic above.	Eligible	X	X
Smith-Gardiner-Norman Farm HD	Historic above.	Listed		X
St. Mary's Episcopal Church & Cemetery	Historic above.	Eligible	X	X
Union Church & Southernmost Schoolhouse	Historic above.	Listed	X	X
Webb House	Historic above.	Poten. eligible	X	X
MT9 (Middletown Cemetery)	Historic above. (cem.)	Undetermined	X	X
MT10 (Gideon Bailey Lot)	Historic above. (cem.)	Undetermined	X	
MT25 (Jewish Cemetery)	Historic above. (cem.)	Undetermined	X	
PO13 (Job Sherman Lot)	Historic above. (cem.)	Undetermined	X	X
PO16 (Union Cemetery)	Historic above. (cem.)	Undetermined	X	X
PO26 (David Albro Lot)	Historic above. (cem.)	Undetermined		X
RI-0100 (RI-MI-02)	Terrestrial arch.	Undetermined	X	
RI-1585	Terrestrial arch.	Undetermined	X	X
RI-1586 (Dennis-Tallman Site)	Terrestrial arch.	Eligible	X	X
RI-1587 (Fairview Site)	Terrestrial arch.	Not eligible	X	X
RI-1591 (Sisson-Greene)	Terrestrial arch.	Eligible	X	X
RI-1601 (SCS field # BM15)	Terrestrial arch.	Undetermined	X	
RI-1614 (SCS field # KP13)	Terrestrial arch.	Undetermined	X	X
RI-1615 (SCS field # KP18)	Terrestrial arch.	Undetermined	X	X
RI-1628 (SCS field # MM13)	Terrestrial arch.	Undetermined		X
RI-1629 (SCS field # MM18)	Terrestrial arch.	Undetermined	X	

Notes: BOEM assumes resources with "undetermined" NRHP eligibility are potentially eligible for the purposes of this analysis. Terrestrial archaeological resources and cemeteries in this table are within 25 feet (7.62 meters) of the Alternative C cable routes options.
Source: PAL 2022.
above. = aboveground; cem. = cemetery; HD = historic district; ID = identification; Poten. = potentially

Table I-12. Historic properties subject to potential adverse effects from adoption of Alternative C-2

Resource ID or Name	Resource Type	NRHP Status
Brownell House	Historic above.	Eligible
Col. D. Durfee House/Old Durfee Farm	Historic above.	Eligible
Cory-Hicks-Borden-Gardner-Stevens House	Historic above.	Eligible
David White Farm	Historic above.	Eligible
Edw. Cook Farm/White Homestead	Historic above.	Eligible
Friends Meeting House and Cemetery	Historic above.	Listed
Manchester House	Historic above.	Eligible
Rod Feather Farm/The Almy Farm & Barn	Historic above.	Eligible
Simmons-Wood-Palmer House	Historic above.	Eligible
Stone House Inn	Historic above.	Listed
Taylors Lane HD	Historic above.	Eligible
Tiverton Four Corners Historic District	Historic above.	Listed
Wilbor House	Historic above.	Listed
Wm. Durfee Farm	Historic above.	Eligible
West Main Road HD	Historic above.	Eligible
LC4 (Woodman Cemetery)	Historic above. (cem.)	Undetermined
LC5 (Woodman Lot)	Historic above. (cem.)	Undetermined
LC6 (Irish Lot)	Historic above. (cem.)	Undetermined
LC10 (New Wilbur Lot)	Historic above. (cem.)	Undetermined
TV5 (William Gray Lot)	Historic above. (cem.)	Undetermined
TV6 (Hillside Cemetery)	Historic above. (cem.)	Undetermined
TV19 (Charles Durfee Lot)	Historic above. (cem.)	Undetermined
TV20 (Samuel Negus Lot)	Historic above. (cem.)	Undetermined
RI-0340 (Jew House)	Terrestrial arch.	Undetermined
RI-0516 (8 Rod Highway)	Terrestrial arch.	Undetermined

Resource ID or Name	Resource Type	NRHP Status
RI-2461 (Wilbor House)	Terrestrial arch.	Undetermined

Notes: BOEM assumes resources with "undetermined" NRHP eligibility are potentially eligible for the purposes of this analysis. Terrestrial archaeological resources and cemeteries in this table are within 25 feet (7.62 meters) of the Alternative C cable routes options.
Source: PAL 2022.
above. = aboveground; cem. = cemetery; HD = historic district; ID = identification; Poten. = potentially

Alternative D would involve elimination of six WTGs in the northeastern portion of the Lease Area. No known marine cultural resources are located in the area from which WTGs would be eliminated. However, removal of these Offshore Project components would reduce potential impacts on currently undiscovered marine archaeological resources that may be present in these areas. In general, Alternative D is unlikely to minimize physical adverse effects on historic properties.

Alternative E includes three sub-alternatives (E-1, E-2, and E-3) to analyze the maximum design scenario for each of the three different foundation categories that could be used for WTGs and OSPs. Alternative E-1 involves the use of piled foundations for all WTGs and OSPs. Alternative E-2 involves the use of suction-bucket foundations for all WTGs and OSPs. Lastly, Alternative E-3 involves the use of gravity-based foundations for all WTGs and OSPs. Effects on marine archaeological resources and ASLFs may be reduced, the same, similar, or increased compared to those under the Proposed Action depending on the final foundation type(s) selected under the Proposed Action and specific locations of marine archaeological resources and ASLFs in relation to proposed WTGs and OSPs. The severity of effects on these historic properties increases with the size of the foundation type and anticipated seabed disturbance. However, overall, the nature and physical extent of proposed activities under this alternative would be largely comparable to those of the Proposed Action.

Alternative F would limit the number of cables installed in the Falmouth offshore export cable route to three, as opposed to five under the Proposed Action. Reduction of the number of installed cables would reduce the overall area subject to potential seabed disturbance, thereby minimizing potential adverse effects on marine cultural resources located within the Falmouth offshore ECC, including the Nantucket Sound TCP and any ASLFs that may be contributing elements to the TCP. BOEM would require SouthCoast Wind to uphold the same applicable commitments to avoid marine archaeological resources and ASLFs located in the Falmouth Offshore ECC should this alternative be adopted (refer to Table I-5 and Table I-7 for information on these specific commitments and Attachment A for a draft of the MOA as of September 30, 2024). However, any historic properties for which there are no commitments to avoidance from SouthCoast Wind still be subject to physical adverse effects.

Overall, the potential reduced scale of Alternatives C, D, E, and F may minimize physical adverse effects on historic properties. However, the majority of historic properties subject to effect under the Proposed Action are located in other areas of the marine APE that are unchanged under Alternatives C, D, E, and F. As a result, these alternatives may reduce adverse effects on specific individual historic properties but would not avoid or substantially minimize adverse effects on historic properties in general. Because of all these factors, the only alternative that BOEM was able to identify that avoids any Project effects on these historic properties was the No Action Alternative.

Minimization of Visual and Cumulative Visual Effects on Historic Properties

The Proposed Action (Alternative B) is anticipated to have visual adverse effects on historic properties. Specifically, these are three historic aboveground resources, including one NHL, in the visual APE for Offshore Project components and one historic aboveground resource in the visual APE for Onshore Project components. A discussion specific to NHLs is provided in *National Historic Landmarks*.

Of all alternatives, only Alternative D involves the reduction in Project components that would reduce Project visibility that could cause visual adverse effects on historic properties. Alternative D would involve elimination of 6 WTGs in the northeastern portion of the Lease Area. However, the number of eliminated WTGs is not anticipated to result in a substantial minimization of visual adverse effects. As a result, BOEM determined that all feasible alternatives, including all feasible WTG layouts, would result in visual adverse effects on aboveground historic properties. Because of all these factors, the only alternative that BOEM was able to identify that avoids any Project effects on these historic properties was the No Action Alternative.

Contributing to the potential 901 WTGs modeled in a maximum-case scenario for other future offshore wind activities, all the action alternatives (B through F) would result in visual adverse effects from offshore WTG structure visibility and lighting, including from navigational and aviation hazard lighting systems. Due to cumulative effects from other offshore wind activities, the same three historic properties in the visual APE for Offshore Project components would continue to be adversely affected by offshore structure and lighting visibility under Alternatives C through F as under the Proposed Action. The cumulative visual effects and lighting on historic properties in the visual APE associated with Alternatives C through F, when combined with past, present, and reasonably foreseeable activities, would be long-term and adverse, until decommissioning of the Project.

National Historic Landmarks

The implementing regulations for Section 106 of the NHPA at 36 CFR 800.10 provide special requirements for protecting NHLs and complying with the NHPA Section 110(f). NHPA Section 110(f) applies specifically to NHLs. NPS, which administers the NHL program for the Secretary of the Interior, describes NHLs and requirements for NHLs as follows:

> National Historic Landmarks (NHL) are designated by the Secretary under the authority of the Historic Sites Act of 1935, which authorizes the Secretary to identify historic and archaeological sites, buildings, and objects which "possess exceptional value as commemorating or illustrating the history of the United States" Section 110(f) of the NHPA requires that Federal agencies exercise a higher standard of care when considering undertakings that may directly and adversely affect NHLs. The law requires that agencies, "to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to such landmark." In those cases when an agency's undertaking directly and adversely affects an NHL, or when Federal permits, licenses, grants, and other programs and projects under its jurisdiction or carried out by a state or local government pursuant to a Federal delegation or approval so affect an NHL, the agency should consider all prudent and feasible alternatives to avoid an adverse effect on the NHL.

BOEM is implementing the special set of requirements for protecting NHLs and for compliance with NHPA Section 110(f) at 36 CFR 800.10, which, in summary:

- Requires the agency official, to the maximum extent possible, to undertake such planning and actions as may be necessary to minimize harm to any NHL that may be directly and adversely affected by an undertaking;
- Requires the agency official to request the participation of ACHP in any consultation conducted under 36 CFR 800.6 to resolve adverse effects on NHLs; and
- Further directs the agency to notify the Secretary of the Interior of any consultation involving an NHL and to invite the Secretary of the Interior to participate in consultation where there may be an adverse effect.

BOEM has planned, and is, taking action to avoid adverse effects on NHLs in accordance with NHPA 110(f) and pursuant to *The Secretary of the Interior's Standards and Guidelines for Federal Agency Historic Preservation Programs Pursuant to the National Historic Preservation Act* (NPS 2021). BOEM has determined that one NHL, the Nantucket Historic District, would be visually adversely affected by the Proposed Action. BOEM has notified NPS (as the delegate of the Secretary of the Interior) and the ACHP of this determination with distribution of this Finding. ACHP and NPS have been active consulting parties on the Project since BOEM invited them to consult at the initiation of the NHPA Section 106 process on the Project beginning on September 29, 2021. BOEM is fulfilling its responsibilities to give a higher level of consideration to minimizing harm to NHLs, as required by NHPA Section 110(f), through implementation of the special requirements outlined at 36 CFR 800.10.

In the Final EIS and as described herein (Table 1-9), BOEM has identified one alternative that reduces the number of WTGs from the maximum-case scenario of the Proposed Action (i.e., Alternative D). This alternative would reduce the visibility of the Project from the NHL. However, BOEM has determined that the Nantucket Historic District would still be adversely affected by the Project given the size, location, and number of proposed WTGs and distance of the Wind Farm Area to the shoreline under this alternative. As a result, BOEM determined that all feasible alternatives would result in visual adverse effects on this NHL. The only alternative that BOEM was able to identify that avoids any Project effects on this NHL was the No Action Alternative.

When prudent and feasible alternatives "appear to require undue cost or to compromise the undertaking's goals and objectives, the agency must balance those goals and objectives with the intent of section 110(f)" (NPS 2021). In this balancing, the NPS suggests that agencies should consider "(1) the magnitude of the undertaking's harm to the historical, archaeological and cultural qualities of the NHL; (2) the public interest in the NHL and in the undertaking as proposed, and (3) the effect a mitigation action would have on meeting the goals and objectives of the undertaking" (NPS 2021). For the Project, the magnitude of the visual effects on the Nantucket Historic District would be minimized by the distance between proposed offshore WTGs and NHL and through environmental factors, including weather and atmospheric conditions, that limit views of the Project WTGs from the NHL. Moreover, while the undertaking would affect the maritime setting of the NHL, it would not affect other character-defining features or aspects of the NHL's integrity. The Nantucket Historic District, should the undertaking proceed, would still illustrate its regional and national significance, and continue to exemplify its national importance.

Through consultation, BOEM refined the minimization measures to the maximum extent feasible and further developed mitigation measures to resolve adverse effects that remain at the Nantucket Historic District after the application of minimization efforts. BOEM has identified and is finalizing mitigation measures specific to the NHL with the consulting parties through development of the MOA (refer to Attachment A for a draft of the MOA as of September 30, 2024). Mitigation measures for adverse effects on the NHL must be reasonable in cost and not be determined using inflexible criteria, as described by the NPS (2021). Mitigation of adverse effects on the NHL meet the following requirements.

- Reflect the heightened, national importance of the property and be appropriate in magnitude, extent, nature, and location of the adverse effect.
- Focus on replacing lost historic resource values with outcomes that are in the public interest, such as through development of products that convey the important history of the property.
- Comply with *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings* (NPS 2017).

I.4.2 Avoidance, Minimization, and Mitigation Measures

BOEM is consulting with Tribal Nations, SHPOs, ACHP, and consulting parties to finalize avoidance, minimization, mitigation, and monitoring measures for addressing the Project's adverse effects on historic properties. Specifically, BOEM's consultation has developed measures to avoid physical effects and minimize visual effects on historic properties in the APE. BOEM has also consulted on mitigation measures that would be triggered in cases where avoidance of adverse effects on historic properties is not feasible.

The NHPA Section 106 consultation process will culminate in an MOA detailing avoidance, minimization, mitigation, and monitoring measures to avoid and resolve adverse effects on historic properties, including cumulative visual adverse effects to which the Project would be additive. These measures will be stipulated in the MOA and summarized in Final EIS Appendix G, *Mitigation and Monitoring*. Attachment A is a draft of the MOA as of September 30, 2024.

I.5 Phased Identification and Evaluation

In consultation with BOEM and the relevant SHPO, SouthCoast Wind will be using a process of phased identification and evaluation of historic properties as defined in 36 CFR 800.4(b)(2). This includes any remaining unsurveyed areas of the terrestrial APE that would require phased identification of historic properties.

SouthCoast Wind has developed a plan for the process of completing additional required cultural resource investigations (refer to Attachment A for a draft of the MOA as of September 30, 2024; Attachment 12 of the MOA is the *Terrestrial Archaeology Phased Identification Plan*). As of September 2024, efforts to identify and evaluate terrestrial archaeological resources in the terrestrial APE have encompassed areas proposed for Onshore Project components in Massachusetts and Rhode Island. However, the identification and evaluation of historic properties for the entire terrestrial APE is

incomplete. Additional archaeological surveys conducted during the phased process may lead to the identification of additional archaeological resources and historic properties in the terrestrial APE. Additionally, if any Project alternatives are approved or there are any changes to the current Project design for either onshore or Offshore Project components that result in Project components falling outside of the previously assessed APE, updated technical studies and reports will be required. While updated information regarding the identification of historic properties was obtained after publication of the Draft EIS and is presented in the Final EIS, additional information may not be available until after the Final EIS.

Information pertaining to identification of historic properties for some Project alternatives may not be available until after the ROD is issued and the COP is approved. For Alternative C, if either sub-alternative (i.e., C-1 and C-2) is selected, BOEM will use the MOA to establish commitments for phasing identification and evaluation of historic properties in the APE, amending the APE, assessing effects, and resolving adverse effects prior to construction. If Alternative C-1 is selected, previously unsurveyed areas associated with the use of a cable route located west of the Sakonnet River would need to be surveyed for marine cultural resources, terrestrial archaeological resources, and historic aboveground resources. If Alternative C-2 is selected, previously unsurveyed areas associated with the use of a cable route located east of the Sakonnet River would need to be surveyed for marine cultural resources, terrestrial archaeological resources, and historic aboveground resources. The approach for phased identification and evaluation will be in accordance with BOEM's existing *Guidelines for Providing Archaeological and Historic Property Information Pursuant to Title 30 Code of Federal Regulations Part 585* and ensure potential historic properties are identified, effects are assessed, and adverse effects are resolved prior to construction.

BOEM has used the MOA to establish commitments for reviewing the sufficiency of any supplemental terrestrial archaeological investigations as phased identification and evaluation of historic properties in the APE; amending the APE per the final Project design, as necessary; and assessing and consulting on effects on historic properties (refer to Attachment A for a draft of the MOA as of September 30, 2024; Stipulation IV provides the protocol for implementing the process of phased identification and evaluation of historic properties). Simultaneous to the publication of the Final EIS, BOEM is coordinating with signatories to the MOA to have the MOA fully signed and executed by December 19, 2024.

I.6 Post-Review Discoveries and Unanticipated Effects

Despite sufficient completion of marine and terrestrial archaeological resource identification surveys, it is possible that unanticipated marine or terrestrial archaeological resources are encountered after BOEM's NHPA Section 106 review is complete and during construction, O&M, or decommissioning of the Project. Non-routine events also could result in an unanticipated effect on a historic property. BOEM has developed a protocol for cases in which there is either the unanticipated discovery of a previously unidentified historic property or an unanticipated effect on a known historic property, both of which are considered to be post-review discoveries. *The Post-Review Discoveries* stipulation of the MOA (Stipulation XI) provides the process for consultations, stabilization of the discovery location, additional

investigations, and implementation of resolution measures in the case of a post-review discovery. Attachments 13 and 14 of the MOA are the Post-Review Discoveries Plans (PRDPs; also known as Unanticipated Discoveries Plans [UDPs]) describing the specific processes that would be followed in the case of an unanticipated, post-review discovery of a marine or terrestrial archaeological resource, respectively. Refer to Attachment A for a draft of the MOA as of September 30, 2024.

I.7 References Cited

Bureau of Ocean Energy Management (BOEM). 2012. *Inventory and analysis of archaeological site occurrence on the Atlantic outer continental shelf*. Prepared by TRC Environmental Corporation for the U.S. Dept. of the Interior, Bureau of Ocean Energy, Gulf of Mexico OCS Region, New Orleans, LA. OCS Study BOEM 2012-008. 324 pp.

Bureau of Ocean Energy Management (BOEM). 2019. *Finding of Adverse effect for the Vineyard Wind Project Construction and Operations Plan.* Revised June 20, 2019.

Bureau of Ocean Energy Management (BOEM). 2020*. Guidelines for Providing Archaeological and Historic Property Information Pursuant to 30 CFR Part 585*. May 27. Available: https://www.boem.gov/sites/default/files/documents/about-boem/Archaeology%20and%20Historic%20Property%20Guidelines.pdf.

Bureau of Ocean Energy Management (BOEM). 2021. *Supplement to the Finding of Adverse Effect for the Vineyard Wind 1 Project Construction and Operations Plan.* March 9. United States Department of the Interior. Sterling, VA.

Bureau of Ocean Energy Management (BOEM). 2023. *Cumulative Historic Resources Visual Effects Assessment for the SouthCoast Wind Energy Project*. Prepared by ICF. January.

Chase-Herrill, Pauline and Brian Pfeiffer. 2012. *Nantucket Historic District National Register of Historic Places Nomination Form (Update).* Prepared for the National Historic Landmarks Program, Washington D.C.

Epsilon Associates, Inc. 2020. *Vineyard Wind Draft Construction and Operations Plan: Volume III Appendice*s. Prepared for Vineyard Wind Offshore Wind Farm Project, New Bedford, Massachusetts.
National Park Service. 2017. *The Secretary of the* Interior's *Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings.*

National Park Service. 2021. The Secretary of the Interior's Standards and Guidelines for Federal Agency Historic Preservation Programs Pursuant to the National Historic Preservation Act. Available: https://www.nps.gov/subjects/historicpreservation/standards.htm.

Public Archaeology Laboratory (PAL). 2022. *Mayflower Wind Brayton Point Overland Alternative Routes: Middletown, Portsmouth, Little Compton, and Tiverton, Rhode Island, Cultural Resource Due*

Diligence. Technical memo report prepared for the Bureau of Ocean and Energy Management (BOEM). September 28. (Not for Public Release).

R. Christopher Goodwin & Associates, Inc. (RCG&A). 2022. *Export Cable Corridor Alternative Approaches Through Mount Hope Bay and The Rhode Island Sound*. Technical memo report prepared for the Bureau of Ocean and Energy Management (BOEM). November 11. (Not for Public Release).

SouthCoast Wind Energy, LLC (SouthCoast Wind). 2024. Construction and Operations Plan (COP), SouthCoast Wind Energy LLC. Available: https://www.boem.gov/renewable-energy/state-activities/southcoast-wind-formerly-mayflower-wind.

ATTACHMENT A. DRAFT MEMORANDUM OF AGREEMENT (AS OF SEPTEMBER 30, 2024)

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ATTACHMENT B. FIGURES

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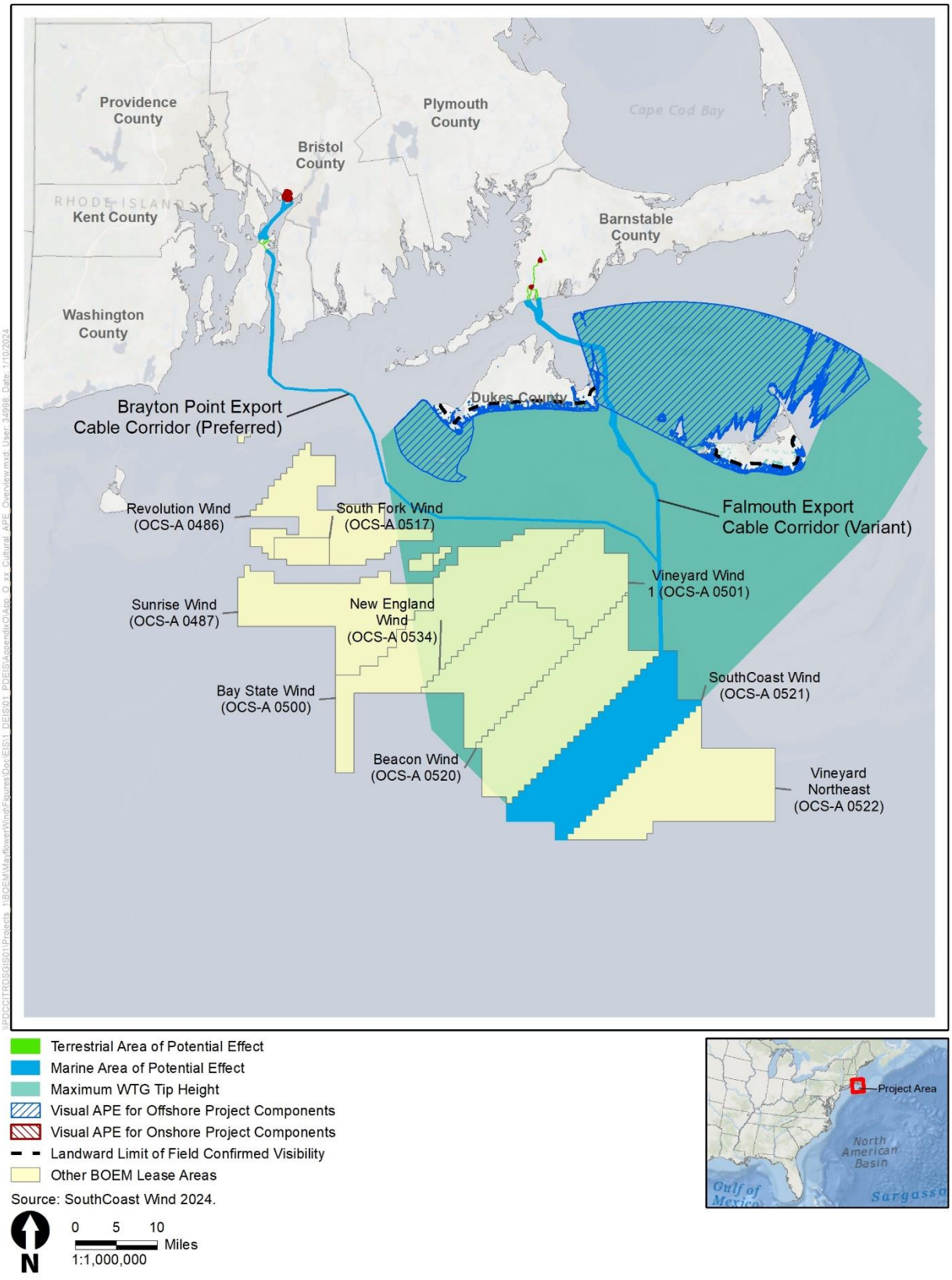

Figure I.B-1. Project APE overview

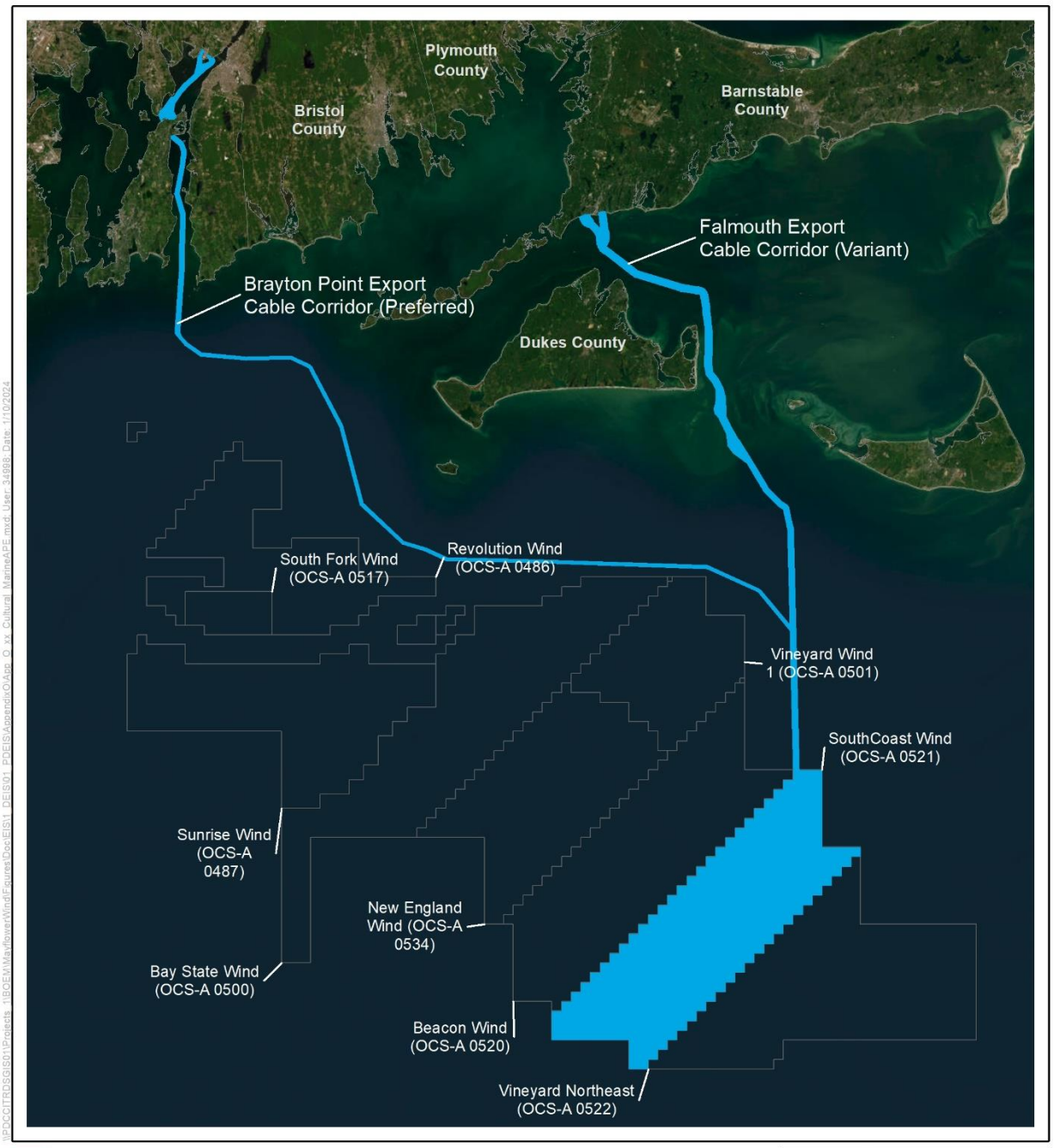

Figure I.B-2. Marine APE

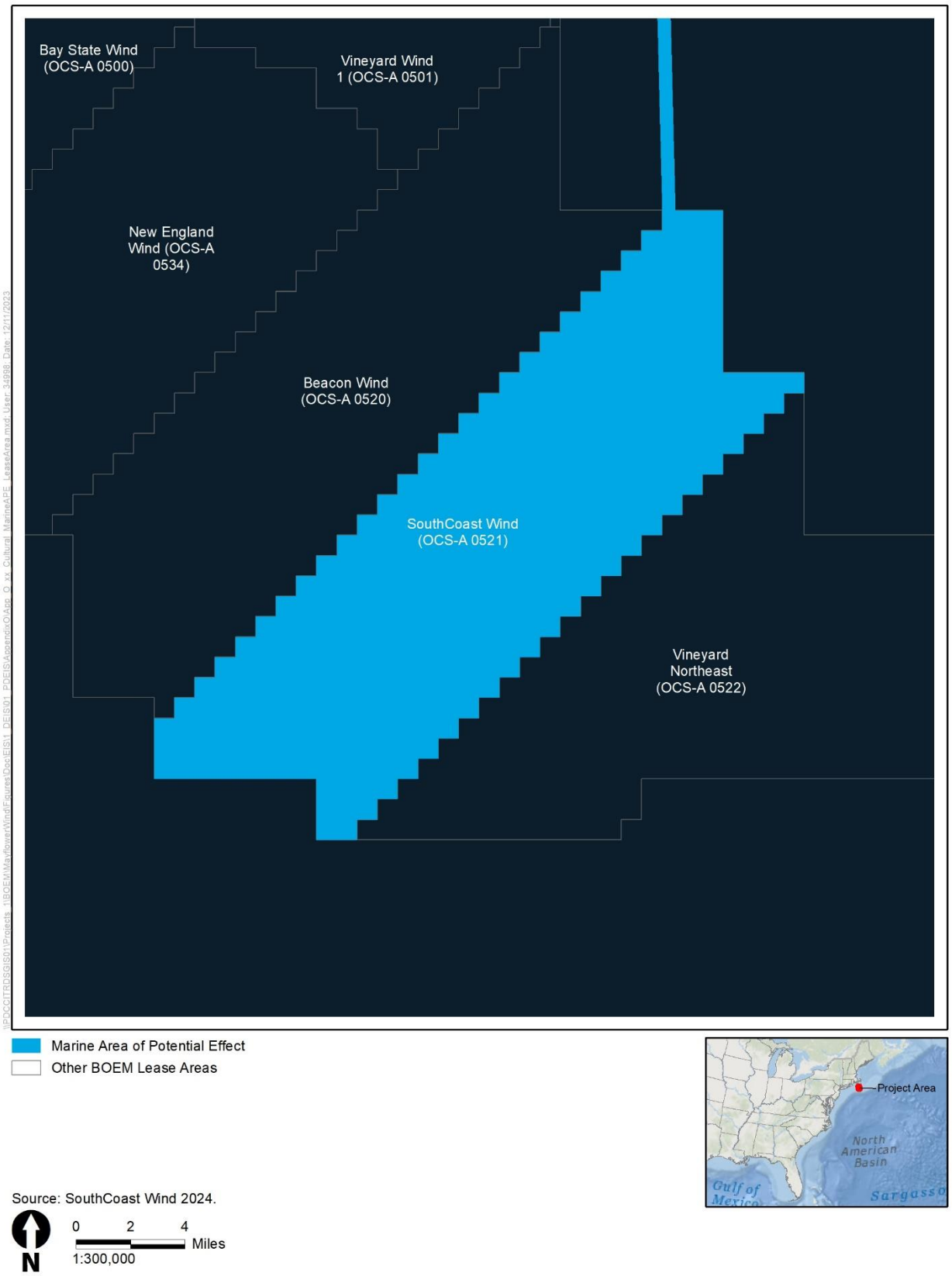

Figure I.B-3. Detail of marine APE within the Lease Area

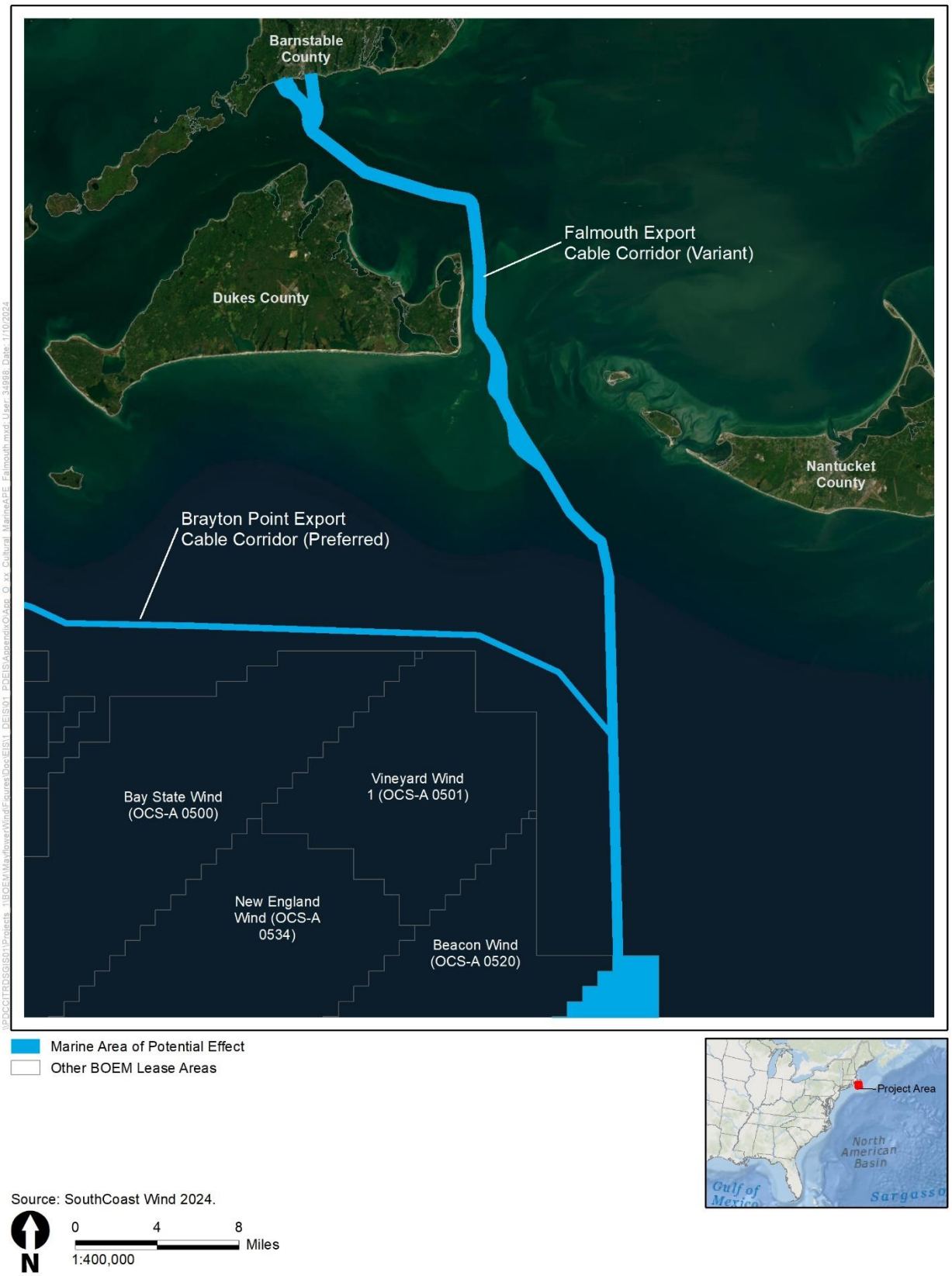

Figure I.B-4. Detail of marine APE within the Falmouth Export Cable Route Corridor

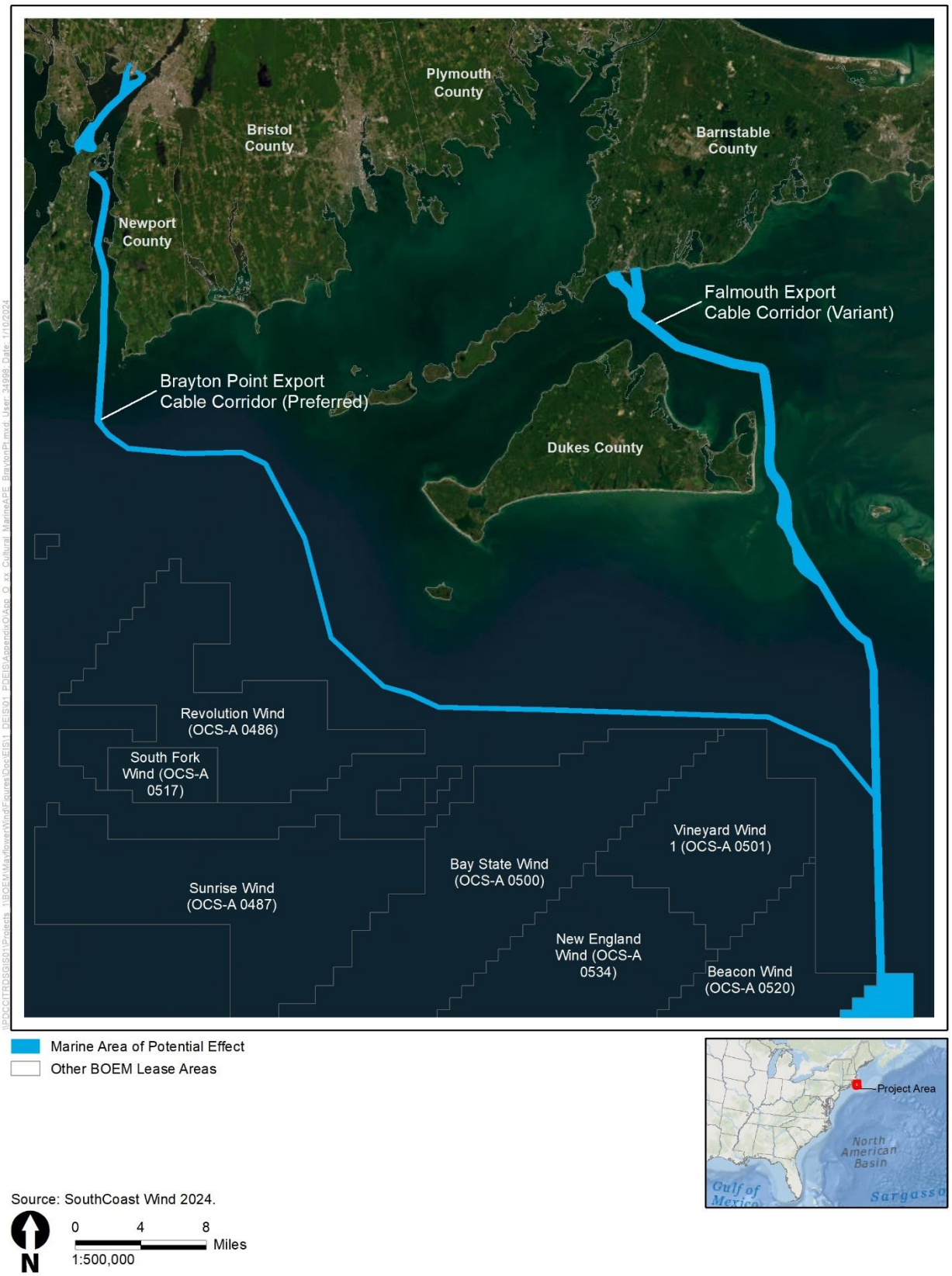

Figure I.B-5. Detail of marine APE within the Brayton Point Export Cable Route Corridor

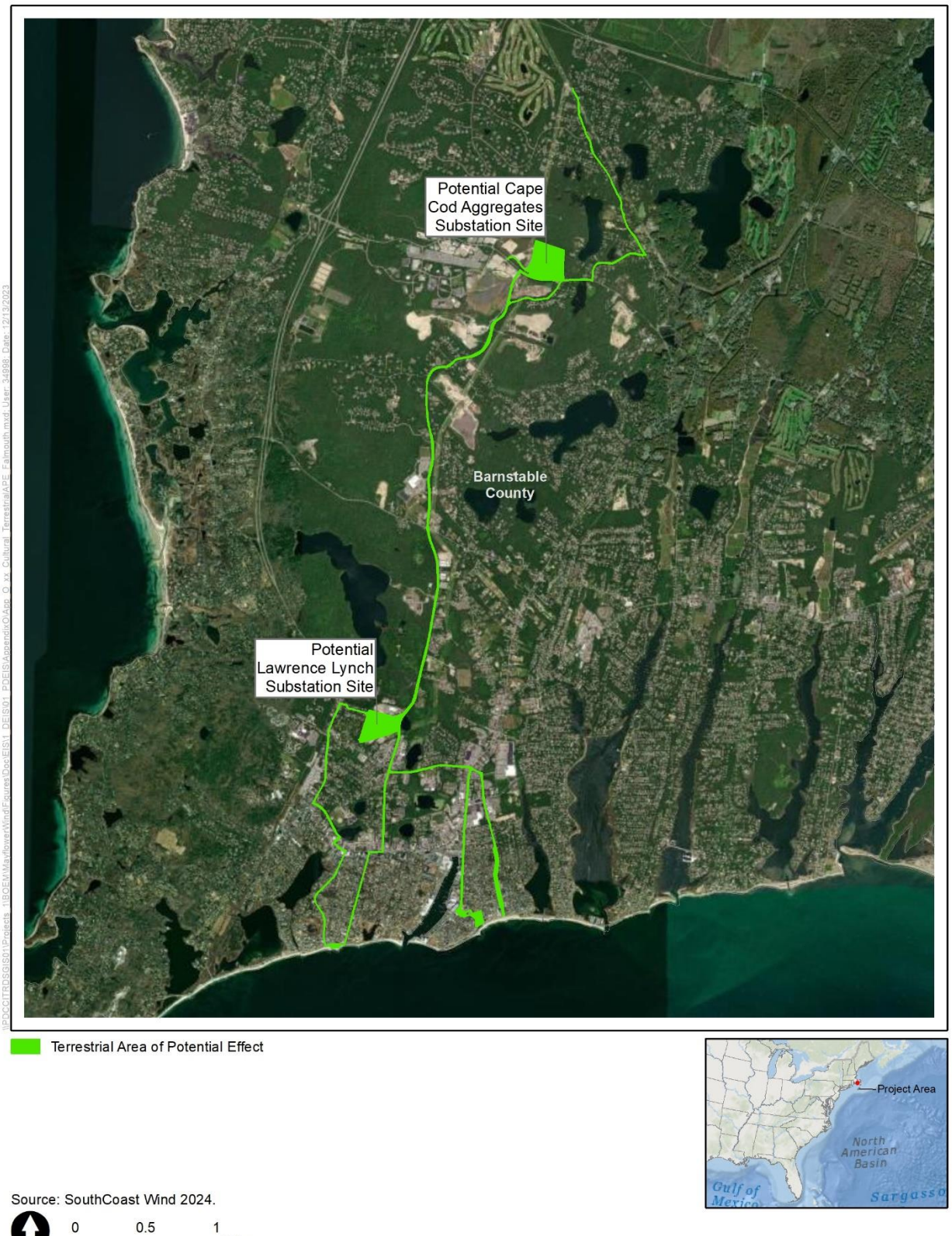

Figure I.B-6. Detail of terrestrial APE for Falmouth (Variant ECC)

Figure I.B-7. Detail of terrestrial APE for Aquidneck Island (Preferred ECC)

Figure I.B-8. Detail of terrestrial APE for Brayton Point (Preferred ECC)

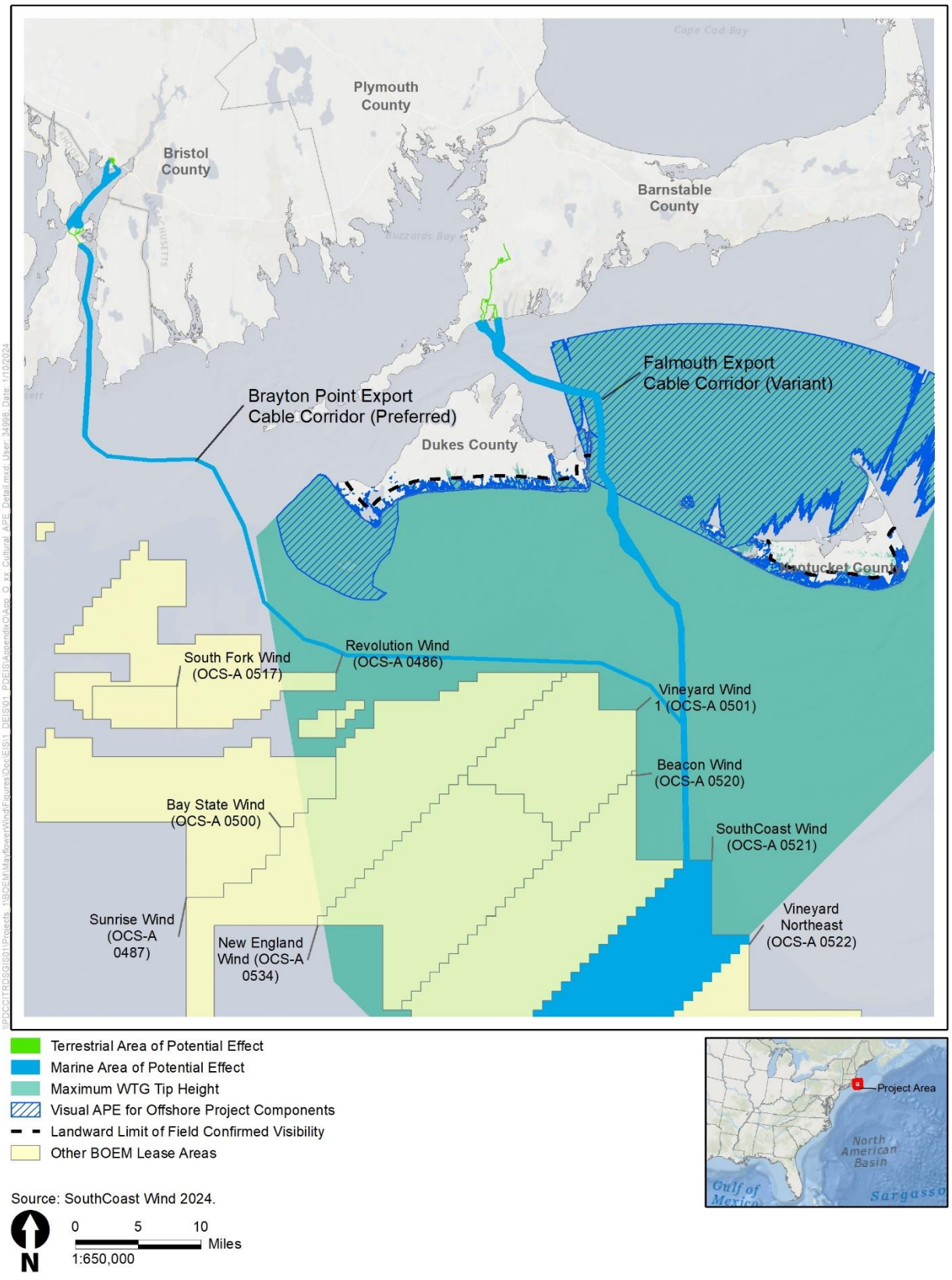

Figure I.B-9. Visual APE for Offshore Project components

Figure I.B-10. Detail of visual APE for Offshore Project components for Martha's Vineyard

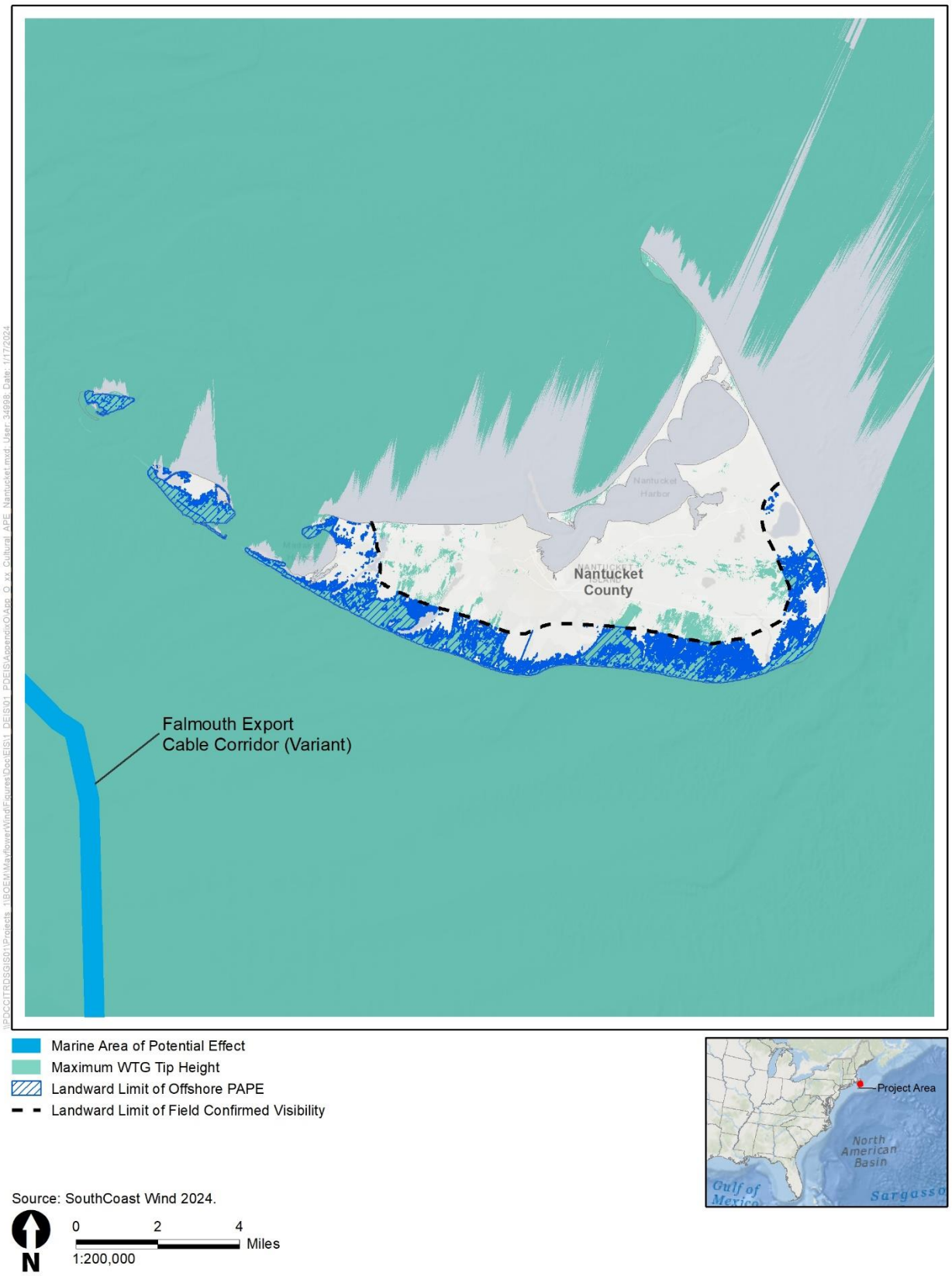

Figure I.B-11. Detail of visual APE for Offshore Project components for Nantucket

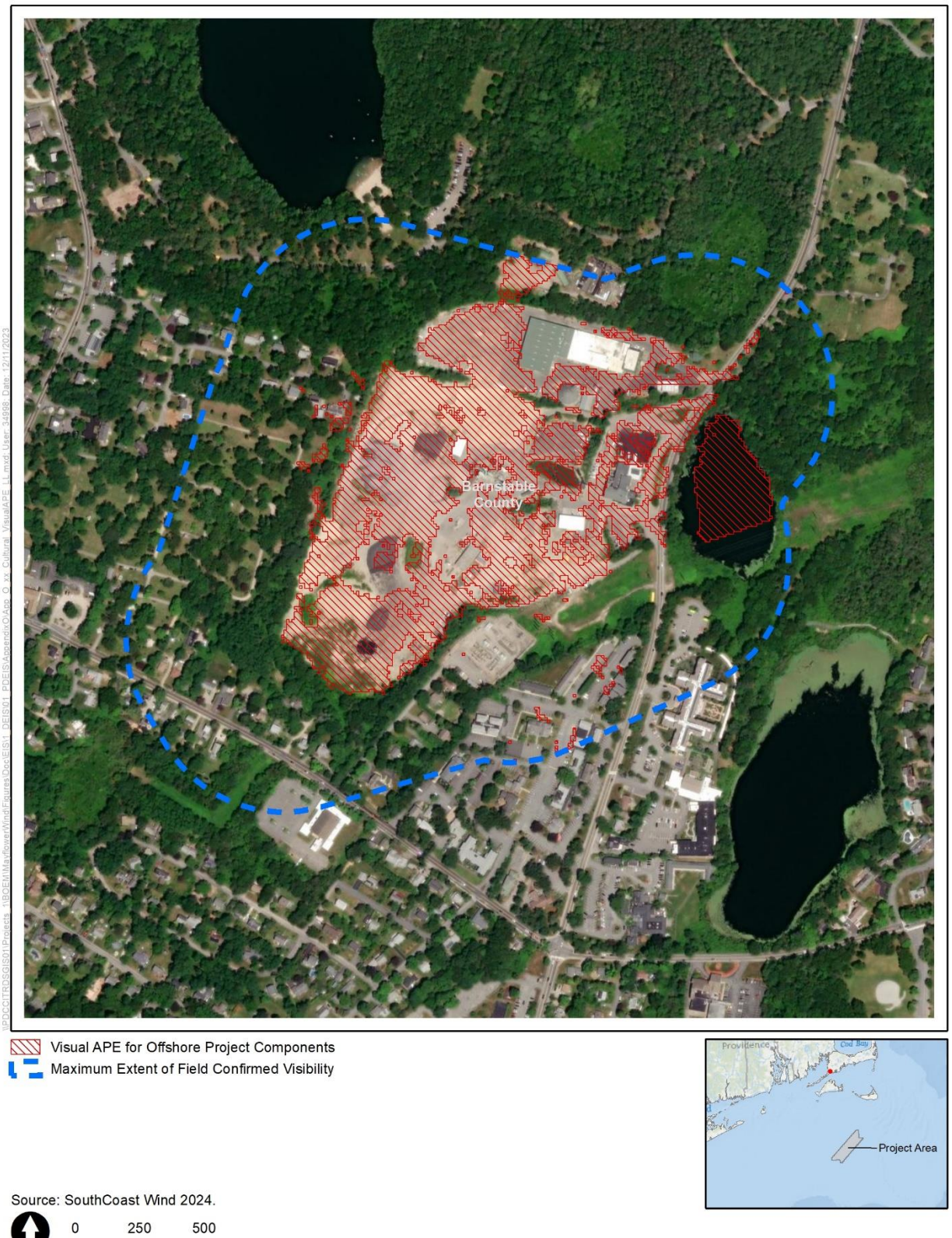

Figure I.B-12. Detail of visual APE for Onshore Project components for proposed Lawrence Lynch Preferred Substation in Falmouth (Variant ECC)

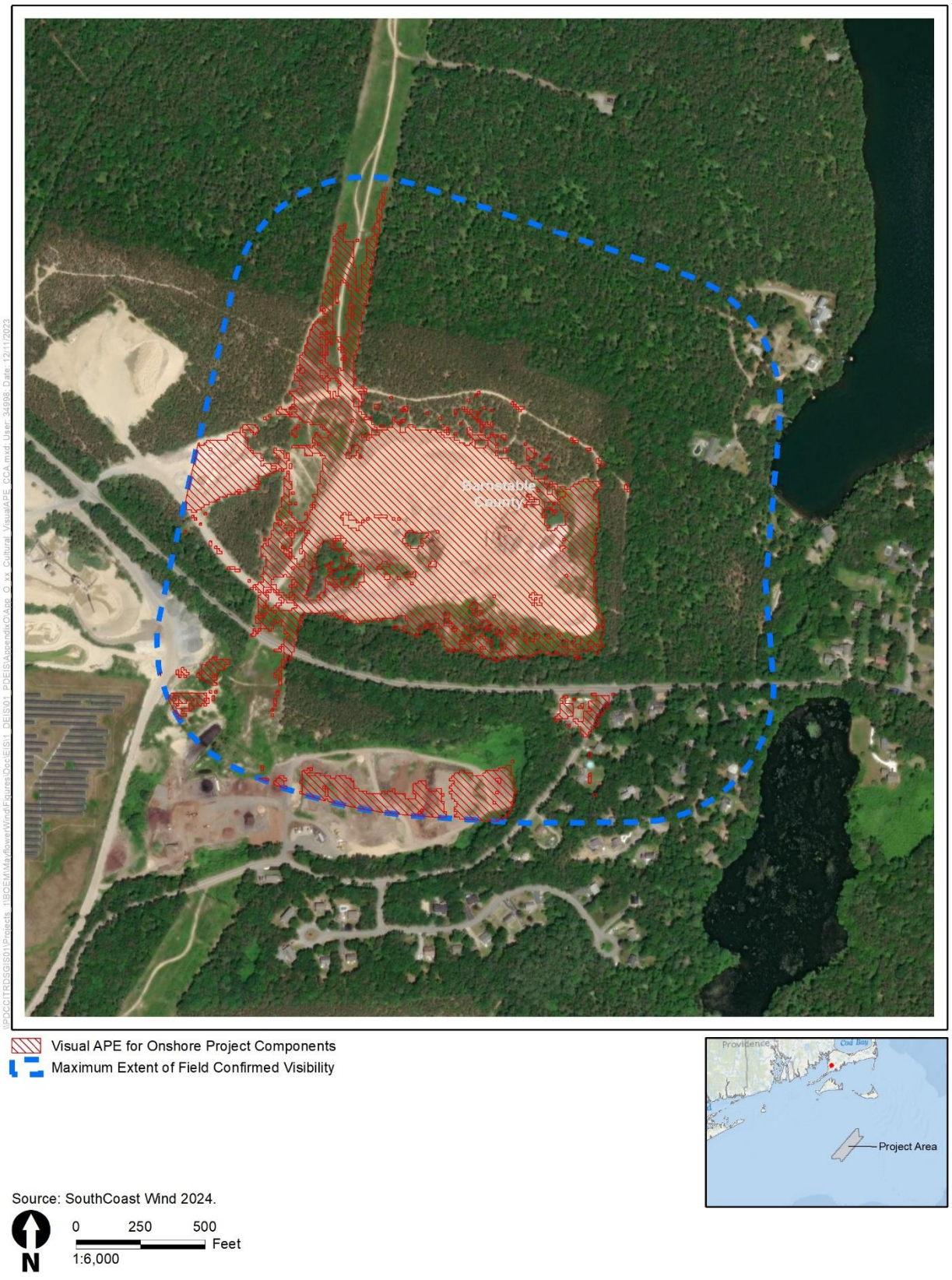

Figure I.B-13. Detail of visual APE for Onshore Project components for proposed Cape Cod Aggregates Alternative Substation in Falmouth (Variant ECC)

Figure I.B-14. Detail of visual APE for Onshore Project components for Brayton Point (Preferred ECC)

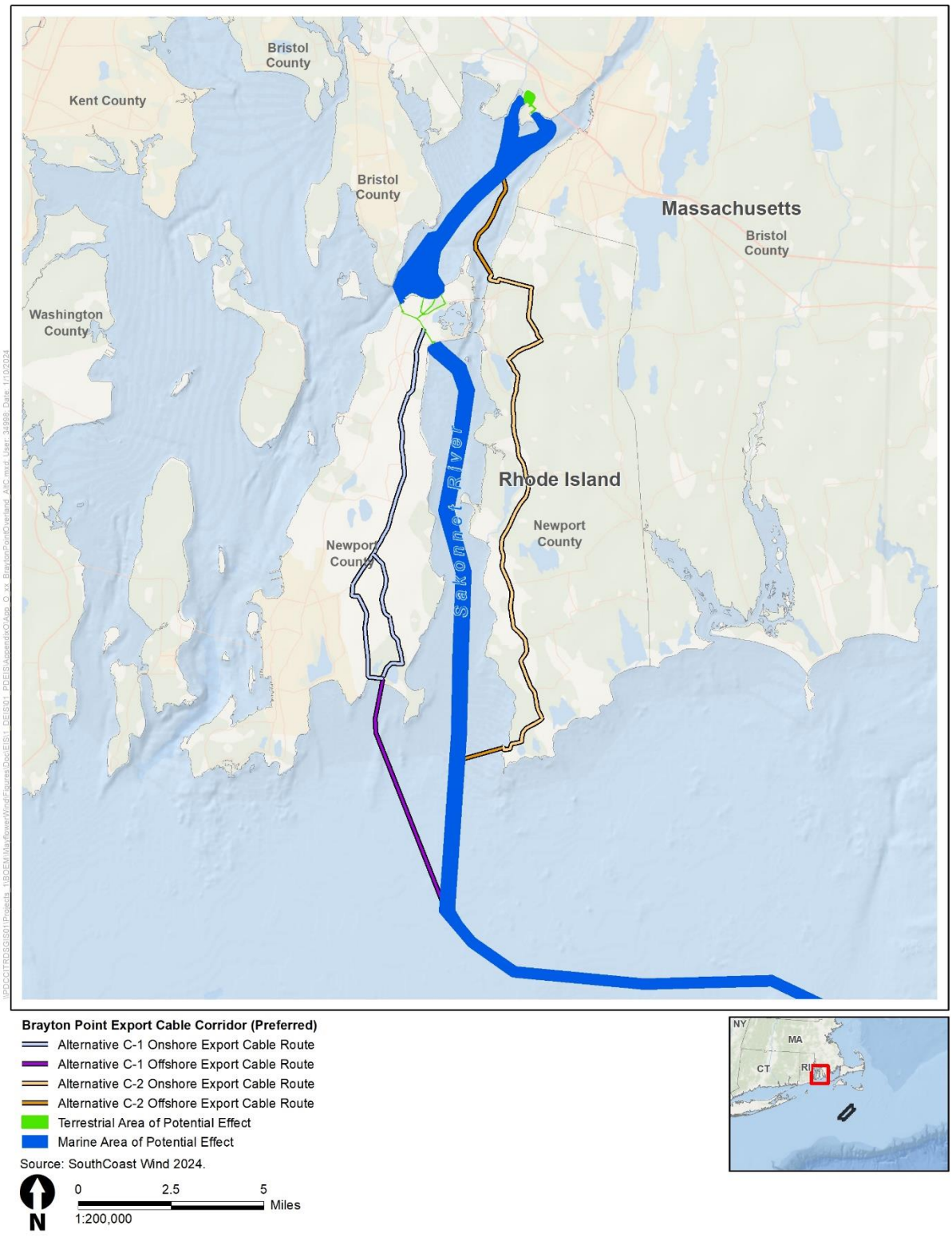

Figure I.B-15. Alternative C route options in relation to the defined Project APE

ATTACHMENT C. ENTITIES INVITED TO BE CONSULTING PARTIES

The following is a list of governments and organizations that BOEM contacted and invited to be a consulting party to the NHPA Section 106 review of the SouthCoast Wind Project, in September and October 2021. During the consultations, additional parties were made known to BOEM and were invited as they were identified; these additional parties are included in this list.

Government or Organization Type	Participating Government or Organization Name
Federal Agencies or Facilities	U.S. Advisory Council on Historic Preservation (ACHP) U.S. Army Corps of Engineers (USACE) U.S. Bureau of Safety and Environmental Enforcement (BSEE) U.S. National Park Service (NPS) U.S. Navy, Naval Facilities Engineering Systems Command (NAVFAC) U.S. Navy, Naval History and Heritage Command
Federally Recognized Tribal Nations	Delaware Tribe of Indians Mashantucket (Western) Pequot Tribal Nation Mashpee Wampanoag Tribe Mohegan Tribe of Connecticut The Delaware Nation The Narragansett Indian Tribe The Shinnecock Indian Nation Wampanoag Tribe of Gay Head (Aquinnah)
SHPOs and State Agencies	Massachusetts Board of Underwater Archaeological Resources (BUAR) Massachusetts Commission on Indian Affairs Massachusetts Historical Commission (MHC) Rhode Island Historical Preservation & Heritage Commission (RIHPHC)
Non-Federally Recognized Tribes	Chappaquiddick Tribe of Wampanoag Nation
Local Governments	Barnstable County Board of Commissioners Cape Cod Commission City of Cranston, Rhode Island City of East Providence, Rhode Island City of Fall River, Massachusetts City of New Bedford, Massachusetts City of New Bedford, New Bedford Port Authority, Massachusetts City of Pawtucket, Rhode Island City of Providence, Rhode Island City of Warwick, Rhode Island County of Edgartown, Massachusetts Dukes County Commission, Edgartown, Massachusetts Falmouth Historical Commission Martha's Vineyard Commission Nantucket Historic District Commission Nantucket Historical Commission

Government or Organization Type	Participating Government or Organization Name
	Nantucket Planning & Economic Development Commission (NPEDC) Town of Aquinnah, Massachusetts Town of Barnstable, Massachusetts Town of Barnstable, Historical Commission, Massachusetts Town of Barrington, Rhode Island Town of Bristol, Rhode Island Town of Charlestown, Rhode Island Town of Chilmark, Massachusetts Town of Dartmouth, Massachusetts Town of East Greenwich, Rhode Island Town of Falmouth, Massachusetts Town of Gosnold, Cuttyhunk Island, Massachusetts Town of Jamestown, Rhode Island Town of Little Compton, Rhode Island Town of Middletown, Rhode Island Town of Nantucket, Massachusetts Town of Narragansett, Rhode Island Town of New Shoreham, Block Island, Rhode Island Town of Oak Bluffs, Massachusetts Town of Portsmouth, Rhode Island Town of Somerset, Historical Commission, Massachusetts Town of South Kingstown, Rhode Island Town of Swansea, Massachusetts Town of Tisbury, Vineyard Haven, Massachusetts Town of Tiverton, Rhode Island Town of Warren, Rhode Island Town of Westerly, Rhode Island Town of Westport, Massachusetts
Nongovernmental Organizations or Groups	Alliance to Protect Nantucket Sound (APNS) Charlestown Historical Society Gay Head Lighthouse Advisory Board Martha's Vineyard Museum Massachusetts Historical Society Museum of African American History, Boston Museum of African American History, Nantucket Nantucket Conservation Foundation Nantucket Historical Association Nantucket Preservation Trust Oak Grove Cemetery Association of Falmouth, Inc. Preservation Massachusetts Rhode Island Historical Society South County History Center, Kingston, Rhode Island The Maria Mitchell Association (Dark Skies Initiative) Trustees Martha's Vineyard and Nantucket Vineyard Power Cooperative
Lessee	SouthCoast Wind Energy LLC

ATTACHMENT D. CONSULTING PARTIES TO THE SOUTHCOAST WIND PROJECT

The following is a current list of consulting parties to the NHPA Section 106 review of the SouthCoast Wind Project as of January 2024. During the consultations, additional parties were made known to BOEM and were added as they were identified; these additional parties are included in this list.

Government or Organization Type	Government or Organization Name	Contact Person
Federal Agencies or Facilities	U.S. Advisory Council on Historic Preservation (ACHP)	Christopher Daniel Jamie Lee Marks
	U.S. Bureau of Safety and Environmental Enforcement (BSEE)	Barry Bleichner Douglas Jones
	U.S. National Park Service (NPS)	Kristin Andel Sherry Frear Mary Krueger Kathy Schlegel
	U.S. Army Corps of Engineers (USACE)	Ruthann Brien Roberta Budnik
	U.S. Navy, Naval Facilities Engineering Systems Command (NAVFAC) HQ	Jennifer L. Harty Juliana Henkel
	U.S. Navy, Naval History and Heritage Command	Alexis Catsambis Bradley A. Krueger
Federally Recognized Tribal Nations	Delaware Tribe of Indians	Susan Bachor Brad KillsCrow Joanna Maurer Martina Thomas Tristen Tucker
	Mashantucket (Western) Pequot Tribal Nation	Rodney Butler Stormy Hay Michael Kickingbear Johnson Crystal Whipple Joelina G. Whitford-Anthony
	Mashpee Wampanoag Tribe	Carlton Hendricks Jason Steiding Brian Weeden David Weeden
	Mohegan Tribe of Connecticut	James Gessner Jean McInnis James Quinn
	The Narragansett Indian Tribe	John Brown Anthony Dean Stanton Dinalyn Spears

Government or Organization Type	Government or Organization Name	Contact Person
	The Shinnecock Indian Nation	T. Rainbow Chavis Jason Cofield Rachel Valdez-Castillo
	Wampanoag Tribe of Gay Head (Aquinnah)	Cheryl Andrews-Maltais Kevin Devine Lael Echo-Hawk Kimberlina Gomez Ryan Sawyer Barbara Spain Jennifer Wade Bettina Washington
SHPOs and State Agencies	Massachusetts Board of Underwater Archaeological Resources (BUAR)	David S. Robinson
	Massachusetts Historical Commission (MHC)	Ed Bell Brona Simon
	Rhode Island Historical Preservation & Heritage Commission (RIHPHC)	Jeffrey Emidy Elizabeth Totten
Non-Federally Recognized Historic Massachusetts Tribe	Chappaquiddick Tribe of Wampanoag Nation	Penny Gamble-Williams Alexis Moreis Lamar Moreis Grace Robinson Ray Williams
Local Government	Cape Cod Commission	Sarah Korjeff Jordan Velozo
	City of East Providence, Rhode Island	Roberto DaSilva
	City of New Bedford and New Bedford Port Authority, Massachusetts	Blair Bailey
	Martha's Vineyard Commission	Dan Doyle Bill Veno
	Nantucket Historic District Commission	Angus MacLeod
	Nantucket Historical Commission	Abby DeMolina
	Nantucket Planning & Economic Development Commission (NPEDC, represented by Cultural Heritage Partners [CHP])	Holly Backus Will Cook (CHP)
	Town of Aquinnah, Massachusetts	Gisele Gauthier Jeffrey Madison
	Town of Barnstable	Erica Brown
	Town of Barnstable, Historical Commission, Massachusetts	George Jessop Cheryl Powell
	Town of Bristol, Rhode Island	Gregg Marsili
	Town of Falmouth, Massachusetts	Jed Cornock
	Town of Jamestown, Rhode Island	Lisa Bryer Edward Mello

Government or Organization Type	Government or Organization Name	Contact Person
	Town of Middletown, Rhode Island	Wendy Marshall
	Town of Nantucket, Massachusetts (represented by CHP)	Lauren Sinatra Will Cook (CHP)
	Town of Somerset, Historical Commission, Massachusetts	James O'Rourke
	Town of South Kingstown, Rhode Island	Theresa Murphy Lucas Murray
	Town of Swansea, Massachusetts	Mallory Aronstein
	Town of Swansea, Conservation Commission, Massachusetts	Adeline Bellesheim
	Town of Warren, Rhode Island	Anthony DeSisto Kate Michaud
	Town of Westport, Massachusetts	Jim Hartnett
Non-governmental Organizations or Groups	Alliance to Protect Nantucket Sound (APNS)	Audra Parker Sandy Taylor
	Gay Head Lighthouse Advisory Board	Richard Skidmore
	Nantucket Preservation Trust	Mary Bergman
	Oak Grove Cemetery Association of Falmouth, Inc.	Jerry Luby
	The Maria Mitchell Association	Joanna Roche
Lessee	SouthCoast Wind Energy LLC	Jennifer Flood Kori Ktona Victor Mastone