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Scoping Summary Report for the Vineyard Northeast Environmental Impact Statement

MAY 2024

PREPARED FOR

Bureau of Ocean Energy Management

PREPARED BY

SWCA Environmental Consultants

**SCOPING SUMMARY REPORT
FOR THE VINEYARD NORTHEAST
ENVIRONMENTAL IMPACT STATEMENT**

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1 INTRODUCTION

This report provides a summary of public comments received by the Bureau of Ocean Energy Management (BOEM) regarding Vineyard Northeast (Project), a proposed wind energy facility located approximately 29 miles offshore Nantucket, Massachusetts, in the Atlantic Ocean.

In July 2022, Vineyard Northeast, LLC (Vineyard Northeast) (formerly Vineyard Wind, LLC), submitted a construction and operations plan (COP) to BOEM seeking approval to construct and operate the Project (Epsilon Associates, Inc. 2024).

On March 25, 2024, BOEM issued a notice of intent (NOI) to prepare an environmental impact statement (EIS) consistent with the regulations implementing the National Environmental Policy Act (NEPA) (42 United States Code 4321 et seq.) to assess the potential impacts of the Project (Proposed Action) and alternatives (89 *Federal Register* 20691). The NOI initiated a public scoping process that solicited input from federal agencies, tribes, state and local governments, and the general public regarding potential significant resources and issues, impact producing factors, reasonable alternatives, and potential mitigation measures to be analyzed in the EIS as well as additional sources of information for consideration. The public scoping period occurred from March 25 through May 9, 2024.

On April 3, 2024, BOEM issued a correction to the NOI (89 *Federal Register* 23042). The correction addressed and corrected the addresses of the in-person public scoping meetings.

2 OBJECTIVE

The goals of this scoping report are to

- ensure that every comment is considered,
- identify the concerns raised by respondents,
- represent the breadth and depth of the public’s viewpoints and concerns as fairly as possible, and
- present public concerns to facilitate BOEM’s consideration of comments.

Although this summary attempts to capture the full range of public issues and concerns, they should be considered with caution. Because respondents are self-selected, their comments may not necessarily represent the sentiments of the public as a whole. This summary attempts to provide a fair representation of the wide range of views submitted, but it does not attempt to treat input as if it were a vote or a statistical sample. In addition, many of the respondents’ reasons for voicing these viewpoints are varied, subtle, or detailed. In an effort to provide a succinct summary of concerns raised, many subtleties are not conveyed in this summary.

3 METHODOLOGY

3.1 Terminology

The following terminology is used throughout this report:

- *Submission*: The entire content submitted by a single person or group at a single time. For example, a 1-page letter from a citizen, an e-mail with a portable document format (PDF) attachment, or a transcript of a public scoping meeting was considered to be a single submission.

- *Comment*: A specific statement within a submission that expresses a sender’s specific point of view, concern, question, or suggestion. One submission may contain many comments.
- *Substantive comment*: Scoping submissions were reviewed to identify and categorize substantive comments. To be substantive, a comment must meet both of the following criteria:
 - *Related to the Project*: To be substantive, a comment must first relate, even tangentially, to the Project; its connected actions; cumulative actions/effects; and other reasonably foreseeable actions, impacts, or conditions.
 - *More than simple opinion*: This criterion requires that substantive comments provide information to help BOEM prepare the EIS by providing some level of support or basis for the commenter’s position or some indication of the issues the commenter believes are significant. As a hypothetical example, the statement “BOEM should reject the Project” would not be considered substantive, but the statement “The Project should not be approved because it would harm commercial fisheries” would be considered substantive.
- *Non-substantive comment*: Comments that did not meet the requirements for substantive comment above were still reviewed and categorized. Most of the non-substantive comments were categorized as general neutrality, general opposition, or general support. Comments not related to the Project or comments suggesting or requesting items out of scope of the NEPA EIS are not summarized in this report.

3.2 Comment Submittal

BOEM received submissions during the public scoping period via the following mechanisms:

- Electronic submissions received via Regulations.gov on docket number BOEM-2024-0009.
- Hard-copy comment letters or comment forms submitted to BOEM via traditional mail.
- Emails submitted to BOEM.
- Comments submitted verbally during the listening sessions of each of the virtual public scoping meetings.
- Hard-copy comment forms submitted during each of the in-person public scoping meetings.
- Comments submitted verbally to the court reporter during the in-person public scoping meetings.

Two virtual public scoping meetings were held via the Zoom webinar platform, and two in-person public scoping meetings were held at the locations and dates outlined in Table 1.

All comments received during the public scoping period are accessible by the public via Regulations.gov by searching on docket number BOEM-2024-0009.

Table 1. Public Scoping Meetings

Date	Location	Time and Subject
March 15, 2024	Zoom virtual meeting	1:00 p.m. eastern standard time Presentation, listening session, and questions and answers (Q&A) session
March 17, 2024	Clarke Center Auditorium Mitchell College 682 Montauk Avenue New London, Connecticut 06320	5:00 to 9:00 p.m. eastern standard time Open house format, pre-recorded presentations, informational posters and photograph images, subject matter experts available for Q&A, court reporter available for comments
March 18, 2024	Westport High School Cafeteria 400 Old County Road Westport, Massachusetts 02790	5:00 to 9:00 p.m. eastern standard time Open house format, pre-recorded presentations, informational posters and photograph images, subject matter experts available for Q&A, court reporter available for comments
March 22, 2024	Zoom virtual meeting	5:00 p.m. eastern standard time Presentation, listening session, and Q&A session

3.3 Comment Processing

Compilation of Submissions

SWCA downloaded and reviewed all submissions from Regulations.gov. These submissions were provided in Hypertext Markup Language (html) format, whereas attachments provided by stakeholders as part of their Regulations.gov submission were typically provided in PDF or Microsoft Word formats. Text from html, PDF, Microsoft Word, and other formats were copied from the original format into a single Microsoft Excel file that served as the primary submission database.

Emails and hard-copy letters sent to BOEM were scanned as PDFs, uploaded to Regulations.gov, assigned unique docket numbers, and added to the database. A PDF version of each virtual scoping meeting transcript was uploaded to Regulations.gov, assigned a unique docket number, and added to the database. A PDF version of each in-person meeting court reporter transcript was uploaded to Regulations.gov, assigned a unique docket number, and added to the database.

Each submission entered into the database received a unique identification (ID) number. The database also included the submitter’s contact information, where provided. Appendix A provides a detailed listing of all the submissions received.

Identification of Comments

Each comment was entered into the primary submission database with a unique comment ID number and subsequently assigned to a NEPA resource or topic area.

4 SCOPING SUBMISSION AND COMMENT SUMMARY

4.1 Submissions

BOEM received 78 submissions during the public scoping period from the public, agencies, and other interested groups and stakeholders. Table 2 shows the types of submissions received.

Table 2. Distribution of Submissions and Comments Received by Type

Submission Type	Submissions Received	Comments Received
Regulations.gov submission	59	516
Scoping meeting transcripts*	2	63
Court reporter†	1	1
Scoping meeting comment cards (in-person)	13	29
Email/postal mail to BOEM representative	3	14
Total	78	623

* Each meeting transcript was treated as one submission. Each transcript contains multiple public comments.

† The court reporter received comments at the April 18 meeting, but did not receive comments at the April 17 meeting. Therefore, there is only one court reporter submission.

The totals in Table 2 include the following submissions¹ by federal, state, and local government entities:

- Three submissions from federal agencies: U.S. Environmental Protection Agency (EPA), National Oceanic and Atmospheric Administration (NOAA) National Marine Fisheries Service (NMFS), and National Parks Service.
- Four submissions from state agencies or representatives: Connecticut Department of Energy and Environmental Protection, Massachusetts Office of Coastal Zone Management, Rhode Island Coastal Resources Management Council, and New York Department of State.
- Three submissions from local commissions or committees: New Bedford Port Authority (Massachusetts), Town of Aquinnah Climate and Energy Committee (Massachusetts), Town of Westport Conservation Commission (Massachusetts).

In addition to the federal, state, and local entities identified above, nine submissions were received from non-governmental organizations (NGOs) through Regulations.gov and 14 comments were made by six NGOs at the scoping meetings. Some NGOs submitted comments at more than one scoping meeting and/or in writing, e.g., through Regulations.gov. A list of these organizations is provided in Table 3. The remaining submissions were received from the public.

Table 3. Non-Governmental Organization Submissions

ACK Residents Against Turbines	New Bedford Maritime Association
BlueGreen Alliance	New England for Offshore Wind
Citizens for Citizens, Incorporated	Northeast Clean Energy Council
Deep Sea Defenders	Oceana
Green Oceans	Operation Clean Sweep
National Wildlife Federation	Westport River Watershed Alliance

¹ The totals in Table 2 do not add up to the submission type totals. Each meeting transcript was considered one submission, and multiple commenters representing different agencies and organizations are reflected in this section.

Submissions were reviewed to determine the overall disposition of the submission provider toward the Project. Based on this review, the dispositions of the 62 unique submissions received through email, postal mail, or Regulations.gov were as follows:

- Pro (generally in favor of the Project): 19 (31%)
- Con (generally opposed to the Project): 24 (39%)
- Neutral (no distinct disposition, or disposition could not be clearly determined): 9 (15%)

During the virtual scoping meetings, 63 scoping comments were made and included in the two transcript submissions. The dispositions of these comments were as follows:

- Pro (generally in favor of the Project): 27 (43%)
- Con (generally opposed to the Project): 33 (52%)
- Neutral (no distinct disposition, or disposition could not be clearly determined): 3 (5%)

During the in-person scoping meetings, 14 scoping comments were made and included in the comment forms and court reporter submissions. The dispositions of these comments were as follows:

- Pro (generally in favor of the Project): 1 (7%)
- Con (generally opposed to the Project): 3 (21%)
- Neutral (no distinct disposition, or disposition could not be clearly determined): 10 (71%)

4.2 Comments

A total of 623 comments were identified. Table 4 shows the distribution of comments by resource or NEPA topic. Each resource or NEPA topic identified in Table 4 is further discussed in Section 4.3. The most addressed resources or NEPA topics were alternatives: suggested new alternatives, marine mammals, general support, air and climate, mitigation, NEPA process, effects analysis (general), and commercial fishing.

Table 4. Distribution of Comments by Resource Addressed

Resource or NEPA Topic	Comments
Air and climate	40
Alternatives: Alternatives not analyzed in detail	1
Alternatives: Comparing alternatives, range of alternatives	3
Alternatives: General alternatives and issues	6
Alternatives: No Action alternative	2
Alternatives: Proposed Action alternative	27
Alternatives: Suggested new alternatives	63
Aquatic habitat/species (general)	16
Bats	2
Benthic habitat and Invertebrates	16
Birds	13
Commercial fishing	30

Resource or NEPA Topic	Comments
Cultural resources	12
Cumulative	9
Decision process	2
Effects analysis (general)	32
Environmental justice	20
Essential fish habitat and finfish	19
General opposition	21
General support	46
Marine mammals	48
Mitigation	38
NEPA process	38
Navigation	4
Other marine uses	6
Public involvement	20
Purpose and need	7
Recreation	6
Sea turtles	3
Socioeconomics	26
Technical editing and document structure	2
Visual resources	5
Water resource	20
Waters of the United States	5
Wildlife (general)	15

4.3 Definition of Resources and Common National Environmental Policy Act Topics Raised

The following sections define and summarize each of the resources or NEPA topics addressed in the comments. Comments have been summarized, as appropriate, particularly for concerns that were raised by more than one commenter.

Air and Climate

Comments related to air and climate encompassed topics such as analysis of air quality, greenhouse gas (GHG) emissions, climate change, ocean temperature, and renewable energy. Some comments expressed support of the Project as a means of reducing GHG emissions and pollution, addressing climate change, reducing fossil fuel dependence, and meeting federal and state pollution reduction goals. Other comments included the following:

- Evaluate and disclose net GHG emissions for the construction, operations, and decommissioning stages of the Project and impacts and benefits to climate change.

- Include potential impacts from sulfur hexafluoride (SF6) leaks from aging equipment and consider using SF6-free technology and other available technologies to mitigate National Ambient Air Quality Standards pollutants.
- Include air quality dispersion modeling and quantitative summary tables comparing modeled concentrations to federal and state standards. Use real world data to show if the Project would or would not reduce overall carbon emissions. Include any inefficiencies of the grid and storage.
- Consider how the Project components, including landing sites, would be durable under sea level rise, storm surges, and severe weather events.
- Evaluate carbon cost of re-suspending previously sequestered carbon in the seabed.
- The analysis of carbon emissions should include construction of all Project infrastructure and transportation of Project materials from other countries and distances greater than 25 miles.
- Evaluate how the GHG emissions from power plants on a grid with the Project would be affected.

Alternatives

ALTERNATIVES NOT ANALYZED IN DETAIL

Commentors requested the EIS provide a clear explanation for the reasons any alternatives, or components of an alternative, are rejected from further analysis, and requested a detailed justification that clearly explains the constraints and what was considered to overcome those constraints.

COMPARING ALTERNATIVES, RANGE OF ALTERNATIVES

Comments related to comparing alternatives or to considering a range of alternatives identified a need to consider a full range of reasonable alternatives to the Proposed Action that balance Project purpose and need and environmental impacts. More specifically, commentors asked that BOEM do the following:

- Include a range of cable routes, cable burial depths, monitoring techniques, array design, turbine spacing, and turbine nameplate capacities.
- Include various foundation options and consider the potential cost and technological advances that may make the inclusion of quieter, more environmentally responsible alternatives.

GENERAL ALTERNATIVES AND ISSUES

Comments related to general alternatives and issues identified areas of concern for BOEM to address in the EIS, including the evaluation and/or presentation of the following:

- The EIS should evaluate the Nantucket Shoals Alternative and Habitat/Fisheries Impact Minimization Alternative described as potential alternatives in the NOI.
- The alternatives discussion should include the previous input provided by the NMFS with respect to foraging habitats, organisms, and potential whale and cod impacts within the geographic area of the Project.
- Look at alternative layouts that minimize impacts to commercial and recreational fishing by using lessons learned from existing offshore wind projects.
- Include alternatives specific to each phase of the Project (siting, construction, operation, and decommissioning) that avoid or minimize and mitigate impacts.

NO ACTION ALTERNATIVE

Commentors stated the No Action alternative should include continued electricity generation with fossil fuel. Commentors stated the lease for the Project does not guarantee a development permit and suggested the agency consider a No Action alternative that avoids all effects of offshore wind in this Lease Area.

PROPOSED ACTION ALTERNATIVE

Comments requested that BOEM provide additional details on the Proposed Action or look at alternatives for certain components. Specifically, commentors suggest the Proposed Action include the following:

- Route cables through industrial or commercial areas rather than the rivers and sensitive wetland and vernal pool areas around Westport. Also consider the impact of electromagnetic field (EMF) radiation on the natural migration of fish in these areas.
- Route cables in the river channel where there are existing cable routes. Use horizontal directional drilling for cable landing.
- Look at running cables up Massachusetts Route 88 instead of Main Road, which travels through a residential and a historic district.
- Describe the width of cable ditches, if trees would be cut down, details of the transfer station, substation location, details of future transmission, and if there is a need for the booster station.
- Disclose any partnerships involved in managing and operating the Project.
- Describe decommissioning, including the carbon dioxide (CO₂) costs. Ensure decommissioning costs are covered by the applicant and not the taxpayers.
- Include a monitoring plan and a response plan for unforeseen incidents that may impact the marine environment and make reporting any impacts to marine species a requirement.
- Include timing restrictions for pile driving and geophysical surveys to protect protected species. Stop surveys and other work if protected species enter the clearance zone.
- Use the best available technology to monitor and mitigate noise impacts.
- Use ecological bioactive concrete. Use gravity-based or suction bucket foundations to avoid impacts of pile driving noise.

SUGGESTED NEW ALTERNATIVES

Commentors suggested or requested that BOEM consider the following new alternatives or components of alternatives. Related submission[s]/comment number[s] are provided in parentheses. Comments that suggested new alternatives that were outside of the scope of the Project are not included.

- Alternatives with cable routes that are outside of Westport and the barrier beach ecosystem at Horseneck Beach, Ocean Beach, and Niantic Beach, and that avoid ocean dredge disposal sites in these areas (BOEM-2024-0009-0026/1, 4; BOEM-2024-0009-0078/10; BOEM-2024-0009-0065/6; BOEM-2024-0009-0078/37, 38).
- Alternative with a layout that is outside the 20-kilometer (km) Nantucket Shoals buffer (BOEM-2024-0009-0026/2; BOEM-2024-0009-0067/4; BOEM-2024-0009-0070/5 1; BOEM-2024-0009-0075/17, 28; BOEM-2024-0009-0078/4, 36).
- Alternative with a layout that minimizes impacts on the viewshed (BOEM-2024-0009-0026/3).

- Alternative with turbine spacing beyond the uniform 1 × 1–nautical mile (nm) spacing design (BOEM-2024-0009-0072/18).
- Alternative with locations outside NOAA’s Wind Exclusion Zone for North Atlantic right whale; that enforces a conservation buffer, seasonal restrictions, and clearance zones; with phased development and monitoring; and that includes other measures that minimize impacts on North Atlantic right whale (BOEM-2024-0009-0031/1; BOEM-2024-0009-0043/2; BOEM-2024-0009-0070/25, 31, 36–41; BOEM-2024-0009-0078/35).
- Alternatives that prohibit high resolution geophysical surveys during seasons when protected species are known to be present in the Lease Area (BOEM-2024-0009-0070/35).
- Alternatives that require best commercially available noise reduction technologies such as bubble curtains, noise mitigation systems, or sound dampeners (BOEM-2024-0009-0070/48).
- Alternative that uses closed-loop cooling and high voltage alternating current (HVAC) electrical service platforms (ESPs) with a booster station (BOEM-2024-0009-0065/6, 22, 24, 50; BOEM-2024-0009-0073/6; BOEM-2024-0009-0075/34, 35; BOEM-2024-0009-0078/39).
- Alternative with layouts and cable depths that would reduce potential impacts to fish habitats, essential fish habitat (EFH), habitat areas of particular concern (HAPC), and fishing activities (BOEM-2024-0009-0067/5; BOEM-2024-0009-0070/34; BOEM-2024-0009-0072/15–17, 20, 36; BOEM-2024-0009-0073/14).
- Alternative that reduces the number or size of wind turbine generators (WTGs) and collocates ESPs in order to minimize impacts to viewsheds, habitats, navigation, and ocean users (BOEM-2024-0009-0067/3; BOEM-2024-0009-0069/3, 6; BOEM-2024-0009-0075/3).
- Alternative that collocates cables with other offshore wind projects, minimizes need for secondary cable protection structures, and bundles cables or includes in single trench (BOEM-2024-0009-0069/4; BOEM-2024-0009-0073/17).
- Alternative with a vessel traffic plan and requirements for marine mammal detection equipment on vessels, reduced speeds, North Atlantic right whale separation distances, and transit lanes (BOEM-2024-0009-0070 11–16; BOEM-2024-0009-0072/33).
- Alternatives that avoid 1) seasonal management areas and 2) areas where persistent or long-duration dynamic management areas are established and extended for more than 3 months in any 1 year of the most recent 5 years (BOEM-2024-0009-0070/33).
- Alternative (the “Habitat Impacts Minimization” alternative) that avoids sensitive habitats and complex substrates, benthic habitats, sand ridges and troughs, cold water corals, and submerged aquatic vegetation (BOEM-2024-0009-0073/4; BOEM-2024-0009-0078/25).
- Alternatives that require frequent reporting to federal agencies and include a public website for reporting monitoring reports and data for transparency (BOEM-2024-0009-0070/20–21).

Aquatic Habitat/Species (general)

General aquatic habitat and species comments included identification of important habitat areas for shellfish, flounder, and horseshoe crabs, along with diadromous fish passage for several species, recommendations for the EIS regarding the use of data sharing and the best available science and data, adaptive management strategies to protect marine ecosystems, and suggestions to use regional data and reports to inform impacts to cold water fisheries. Commenters provided the following recommendations for inclusion in the EIS:

- Analyze impacts on fish, including trout, and species that prey on them, including osprey, from the cable routes on Horseneck Beach and through the Westport River.

- Identify and describe the effects of pollutants on fish, spawning sites, forage/nursery habitat, and migratory pathways.
- Quantify and evaluate losses of eggs, zooplankton, juvenile, and adult fish from impingement, entrainment, and heated effluent from the cooling stations. Include an analysis of intake screen mesh sizes. Also examine the food chain effects resulting from losses due to the cooling system (e.g., effects from loss of crustaceans on North Atlantic right whale).
- Identify and evaluate environmental monitoring throughout the Project's life and discuss how results will be shared with agencies and the public. This should be conducted by an independent party or NOAA and should include chemical and sonic monitoring, assessment of physical alteration of the seafloor and of currents and winds, visual and acoustic surveys for protected species, and biological/ecological surveys for plankton abundance and marine wildlife presence and abundance.
- Analyze effects of EMFs on fish and crustaceans and migration pathways for fishes, turtles, mammals, and elasmobranchs.
- Analyze impacts to coral reefs due to increased temperatures from WTGs and construction, implement anchoring plans that avoid corals, and microsite offshore export cable corridors around corals.
- Analyze effects on aquatic habitat and species from noise; loss/conversion of habitat; alteration of food chains; introduction of novel, artificial hard surfaces; invasive species spread; atmospheric energy extraction/wind wake effect; lighting acting as an attractant; EMF and heat from cables; construction activities; chemical emissions; preconstruction or postconstruction monitoring surveys (i.e., effects of survey gear on species); and changes to ocean stratification and circulatory patterns.
- Assess the reduced regional scientific survey access to the Lease Area on stock assessments and the resulting increased uncertainty that would impact fisheries operations.
- Include cumulative impacts on hydrodynamics and oceanographic and atmospheric conditions in the region regarding the distribution, aggregation, and abundances of plankton and their associated food chains.
- Assess impacts from dredging and dredge spoils on adhesive or demersal eggs and buoyant larvae.
- Discuss short-term, long-term, and permanent changes to EFH and their prey and to federally managed species and their prey during construction, operation, and decommissioning of the Project.

Bats

Concerns were expressed about the risk of bat mortality from collision with wind turbines. Specific concerns were raised regarding the endangered northern long-eared bat. Comments pointed to data limitation regarding bat fatalities from offshore wind facilities and insufficient information in the COP related to potential impacts on bats from the Project. In particular, there is concern that there are not enough data to support the claim that bats exhibit "avoidance" behavior, and that there is insufficient information available to fully address risk to migratory bats. A comment suggested that additional postconstruction studies of bat migration and behavior would be critical to understanding collision risk for these species and recommended requiring monitoring through cooperation with non-profit organizations and federal agencies during bat migration.

Benthic Habitat and Invertebrates

Comments identified concerns for impacts to benthic habitat and invertebrates from turbine foundation, cable, and scour protection installation. Commenters provided the following recommendations for inclusion in the EIS:

- Describe the areal extent, locations, and expected recovery times for disturbed seafloor habitats.
- Quantify benthic habitats as complex or non-complex; microsite the offshore export cable corridors around complex habitats; and analyze the potential for long-term impacts to complex habitats from the presence of structures, vessel anchoring, and cable emplacement.
- Include a benthic habitat monitoring plan outlining thresholds and timelines for effective/ineffective recovery and mitigation, including thresholds that trigger additional monitoring and/or mitigation.
- Include a boulder relocation reporting plan to detail the documentation and communication of boulder relocation to other vessels, including a timeline for reporting new information. This should also include details on mitigation for hang hazards.
- Include an anchoring plan to delineate hard bottom habitats, eelgrass beds, and other sensitive habitat and restrict anchoring in those areas.
- Discuss and analyze effects on benthic environments from construction activities (i.e., plowing and dredging) and placement of bottom sediments from construction activities.
- Analyze effects of heated and chlorinated discharge on benthic and pelagic resources in the areas of the ESPs.
- Explain the justification for omitting an analysis of the effects on zooplankton from entrainment by jetting tools.
- Identify and provide a map showing glauconite areas and discuss their effects on Project siting.
- Include measures to avoid/minimize impacts to sensitive benthic habitats, including natural hard-bottom complex substrates (particularly those with macroalgae and/or epifauna), submerged aquatic vegetation, dense faunal beds (e.g., cerianthid beds), shellfish habitat and reefs, other biogenic reefs, and prominent benthic features.

Birds

Concerns were expressed regarding the difficulty of analyzing potential impacts to birds and predicting the number of individuals exposed to the rotor swept zones due to the lack of data. Comments recommended that BOEM continue to work on the technology, such as receiving stations and antennas or study platforms, that can assess the location and movement of birds offshore and use compensatory mitigation.

Comments indicated that the Project would occupy a site within the migratory Atlantic flyway region and interfere with multiple endangered birds and eagles. Commenters urged for compliance with the Migratory Bird Treaty Act, Endangered Species Act, and the Bald and Golden Eagle Protection Act. Commenters provided the following recommendations for inclusion in the EIS:

- Identify and optimize opportunities for avoiding and mitigating impacts to nesting shorebirds, waterfowl, and critical habitat areas and for avoiding or minimizing conflicts within avian migratory corridors along the Atlantic flyway. This should apply to a broad range of bird species and should not be limited to ESA-listed species or those protected by the Migratory Bird Treaty Act.

- The updated endangered status of the black-capped petrel must be considered appropriately in the EIS.
- The areas south of Martha’s Vineyard and Nantucket host huge numbers of wintering sea ducks and alcids. The EIS should pay special attention to proximity to this known habitat hotspot for marine birds, including movement tracking data that link bird use of offshore waters at and near the Project.
- Include an explicitly defined monitoring and adaptive management plan and use the best available science then available at each Project stage (planning, construction, operation, decommissioning) consistent with the most-current recommendations that emerge from the Regional Wildlife Science Collaborative for Offshore Wind and similar consortia that are compiling best management practices for birds and offshore wind.

Commercial Fishing

Comments related to commercial fishing indicated that the EIS must fully disclose existing conditions and Project direct, indirect, and cumulative impacts to the local commercial fishing industry and the effect it would have on the local economy, based on duration and timing of construction and decommissioning activities. Comments identified economically important fisheries, including Atlantic cod, quahog, oysters, Jonah crab, scup, summer flounder, silver hake, monkfish, American lobster, golden tilefish, and longfin squid, and expressed concerns about the impact on live fisheries from EMFs. Commenters expressed concerns regarding safe transit zones, the use of navigational aids for mariners, and the potential socioeconomic impacts on the fishing industry.

Commenters provided the following recommendations for inclusion in the EIS:

- Evaluate impacts on the distribution, abundance, and feeding of key species currently in or adjacent to the Project footprint and comprehensively describe all commercial and recreational fisheries that may be affected by the Project.
- Include an estimate of the area of lost fishable seafloor within the cable routes due to secondary cable protection, seafloor disturbance, and boulder relocation.
- Characterize the extent and value of commercial, for-hire, and charter fishing within the Project footprint using the exposure analysis in Appendix II-F (King and Associates 2023) of the Project’s COP (Epsilon Associates, Inc. 2024), and include a breakdown of the economic exposure of the Project by state, port, gear type, and fishery.
- Coordinate with, and include the most recent data from, Massachusetts Office of Coastal Zone Management, Massachusetts Division of Marine Fisheries, Massachusetts Fisheries Working Group for Offshore Wind, NOAA, Atlantic States Marine Fisheries Commission, NMFS, and state agencies.
- Include a fisheries and benthic research plan to describe how Vineyard Northeast will coordinate with other developers to better understand and report on effects to fisheries.
- Include a fisheries communication plan to describe measures to communicate with researchers that have acoustic telemetry equipment deployed within or adjacent to the Project footprint.
- Using BOEM’s draft fisheries mitigation guidance (BOEM 2022) as a baseline, outline mitigation measures in place to protect fisheries, including multipliers to ensure shoreside income loss is adequately covered. Compensatory mitigation should cover the period of construction and 5 years postconstruction. Analysis should include the “multiplier effects,” including an expected “cascading effect” in diversified fishing businesses.

- Analyze impacts to scientific surveys by fisheries management entities, such as Massachusetts Division of Marine Fisheries, and on the management of the associated fisheries.
- Describe how the Project will ensure that fishermen have access to the Lease Area during operations.
- Include minimization measures such as time-of-year restrictions for busy recreational and commercial fishing seasons. Detail the process that will be used to determine how other fishing gear (whelk pots, fish pots, nets, etc.) not described in the COP will be determined to be abandoned and consider the legal ramifications of the possession of any abandoned commercial fishing gear (excluding lobster traps) that has identifying markings and has been legally set in Connecticut state waters.
- Include data and analysis of historic and recent fishery landings, revenue, and effort; fishery efforts within the Lease Area, including the number of vessels and trips, gear types used, and dependency upon fishing within the Lease Area; shoreside support services affected by the Project, including dealers, processors, distributors, and suppliers; and coastal communities dependent on fishing operations within the Lease Area.
- Require the lessee to develop a gear loss compensation program that covers both site assessment plan activities and COP activities for consistency and transparency across the lifecycle of the Lease Area.

Cultural Resources

Cultural resources comments addressed consultation recommendations; information and mitigation requests for the EIS; and concerns related to Project impacts to historic sites, national historic landmarks, and tribal resources. Commenters urge compliance with Section 106 of the National Historic Preservation Act and for collaboration with tribes, state historic preservation offices, national historic landmarks, and National Historic Lighthouse Preservation Act properties. Additional recommendations identified by commenters included the following:

- BOEM should conduct meaningful and regular collaboration and consultation with tribal officials, including federally and state-recognized tribes.
- BOEM should develop and implement comprehensive best management practices to avoid, minimize, and mitigate any potential adverse impacts to historic, cultural, and natural resources.

Cumulative

Cumulative comments indicated that the EIS should improve upon past analyses to ensure a high standard and consistency for the cumulative impact analyses for offshore wind projects. Commenters urged BOEM to consider potential changes in species' ranges and seasonal uses due to various anticipated levels of warming and climate change and to account for the potential negative impacts of a No Action alternative, which includes the climate risks of not mitigating emissions through the development of the Project and offshore wind development. Commenters provided the following recommendations for inclusion in the EIS:

- Include an analysis of the cumulative impacts of all phases of the Project in combination with any past, present, and reasonably foreseeable future actions, including energy infrastructure (including existing and future wind energy projects), sand mining, aquaculture, vessel activity, fisheries management actions, disposal sites, and other development projects.

- Address impacts of overlapping and adjacent projects on protected species, habitat, and fisheries resources and operations and associated communities, including overlapping timeframes for project development.
- Evaluate effects on oceanographic and atmospheric conditions in the region, and consider associated ecosystem effects in the cumulative effects analysis.
- Evaluate the cumulative impacts on the fishing industry from large-scale offshore wind build out along the East Coast with attention given to displacement of fisheries due to loss of habitat, lack of species presence, gear and vessel conflicts, and regulations and permitting constraints.

Decision Process

Comments on the decision process included a request for compliance with Executive Order (EO) 40018 regarding the Project's environmental suitability. Commenters requested that BOEM show that the Project will reduce CO₂ emissions and decrease fossil fuel use in order to fulfill the mandate under EO 40018 to ensure efficacy, safety, and justice and make a fair and just decision about the viability of the Project.

Effects Analysis (general)

Effects analysis comments included general concern about the Project's potential impacts across multiple resources and suggestions for inclusion of specific analyses. Comments requested a comprehensive review of the Project and analysis of the potential impacts on the Westport River watershed and surrounding ecosystems, Westport Harbor, and the East and West branches of the Westport River. Commenters requested that BOEM obtain and disclose data necessary to its environmental impact analysis in the EIS.

Several commenters submitted requests for additional analysis of effects not yet considered for the Project for inclusion in the EIS. These requests include the following:

- The significance criteria definitions identifying the level of impacts (negligible, minor, moderate, major) should not embed terms defined by other statutes and should be written in a way that clearly considers the spectrum of effects to individual animals (e.g., temporary behavioral disturbance, injury) and uses definitions that are appropriate for the resource being considered.
- Consider and implement an analysis of the expected EMF field as a function of distance from cables based on planned cable orientation and the surrounding media. Include effects on migratory fish navigation, heat dissipation, and physical barriers.
- Use data and analyses presented within the New York State Energy Research and Development Authority cables assessment (New York State Energy Research and Development Authority 2023) to develop environmental analyses for both onshore and offshore cables and substations.
- Consider the large body of relevant published scientific literature quantifying natural and anthropogenic variability across a wide range of scales as critical context, including a recently released National Academies of Science, Engineering, and Medicine (NASEM) report on the hydrodynamic impacts of offshore wind development.
- Collaborate with state efforts, scientists, NGOs, developers, and other stakeholders to gather and use information from coordinated monitoring efforts to inform cumulative impact analyses moving forward.

Environmental Justice

Comments related to environmental justice included recommendations that the EIS analyze the Project's potential impacts and benefits to environmental justice communities. Specific topics mentioned for the analysis included the impacts of electromagnetic waves, air quality, proximity to pollutants, and the effects of EMFs on community health. A request was made that the EIS incorporate existing reports that describe disproportionate health impacts on environmental justice communities.

Other comments included the following:

- Requests for extensive studies on the effects of cable routing and other Project-related activities on the communities where the installation will occur, including impacts to stormwater runoff, known sources of contamination, and water quality and monitoring through all stages of construction.
- Suggestions that BOEM actively engage with environmental justice communities in timely and proactive stakeholder engagement.
- Suggestions that BOEM use EJSCREEN and the EPA's Health Impact Assessment to determine impacts on communities with environmental justice concerns and to evaluate potential environmental justice impacts related to port activities for the Project.
- Requests that BOEM evaluate how offshore wind would provide air quality benefits to environmental justice populations in addition to estimating carbon emissions and air quality impacts from the Project located within or near population centers and disproportionately located within or near environmental justice communities.
- A summary of existing regulatory requirements that require federal agencies to identify and address disproportionate impacts on environmental justice populations.

Essential Fish Habitat and Finfish

Comments related to EFH and finfish addressed a range of current conditions and analysis requests as well as measures to avoid, minimize, or mitigate potential Project impacts. Topics identified for inclusion as part of the existing conditions portion of the EIS included a complete list of affected species and a complete list of protected species in the area.

Comments specific to EFH included a request for detailed analysis of the effects of anticipated impacts of construction, operation, and decommissioning on EFH that supports sensitive life stages of fish and their spawning, breeding, and feeding activities. Topics identified for analysis in the EIS included a range of direct, indirect, and cumulative EFH and finfish impacts from construction activities and vessel traffic. Identified impact concerns included impacts to zooplankton, disturbance of complex hard-bottom habitat, and EMF and acoustic impacts to finfish. Particular concerns for Atlantic sturgeon, Atlantic cod, and hard-bottom habitats were communicated. Comments encouraged time-of-year restrictions or other mitigative measures to minimize impact to marine fisheries resources, along with monitoring plans. Examples of suggested measures included the following:

- Construction to be scheduled to observe time-of-year and time-of day restrictions.
- Wind turbines to be sited away from complex, hard-bottom habitat.
- Site-specific benthic habitat assessments and Atlantic cod spawning surveys to be conducted to inform siting of the Project.
- Monitoring effort to document habitat disturbance and recovery.

- Studies for impacts to fish migration and habitats along proposed cable routes, including the use of acoustic surveys to collect data.
- Assessment of Project effects on EFH and range of alternatives to conserve and minimize impacts to high-value habitat, including freshwater species, particularly where cable routing overlaps with freshwater habitat.
- Studies on the effects of Project overlap with HAPCs.
- Studies of the potential impacts of noise generated by the Project on fish spawning activities.

General Neutrality

In approximately 29% of the submissions, including meeting transcripts (23 out of 78), commentors and comments were generally neutral toward offshore wind and renewable energy projects and/or neutral toward the Project but expressed concerns over the content of the COP and/or the process by which their environmental and/or socioeconomic concerns would be addressed. Specific concerns from these submissions are discussed in the appropriate resource sections of this report.

General Opposition

Approximately 77% of the submissions, including meeting transcripts (60 of the 78 submissions), provided statements of opposition for the Project. Comments from these submissions cited the following detractions of the Project.

- Irreversible impacts to irreplaceable resources such as the ocean floor and water quality.
- WTGs represent navigational hazards to humans and wildlife.
- Visual impacts and sound impacts at the shoreline from the wind farm.
- Economic hardship to the commercial fishing industry.
- Noise and EMF impacts to wildlife and humans.
- Lack of baseline monitoring data and the need for additional and updated studies to be conducted.
- Concerns over onshore and offshore water resources and quality.
- Opposition to the town of Westport, Massachusetts, used as the landfall location for the cables.
- Economics of the Project and general concerns of the use of public funds.
- Use of overseas materials and mining to create turbines and other infrastructure.
- Disposal methods for wind turbines and other Project material upon decommissioning.
- Concerns over potential impacts to human health.

General Support

Approximately 60% of the submissions, including meeting transcripts (47 of the 78 submissions), provided statements of support for the Project. Comments from these submissions cited the following benefits of the Project:

- Production of clean energy to meet current and future state and federal energy goals and mandates and to address climate change.

- Support for the Project team based on community experience with previous projects as being responsible and reliable developers.
- Support from local businesses that have directly benefited from the offshore wind industry.
- Reduction of global GHG emissions and local and regional air pollution.
- Improvement of air quality for vulnerable communities.
- Consumer electricity cost savings.
- Provision of socioeconomic benefits, including job creation, economic growth, sustainable economies, supply chain development, and workforce development.
- Provision of an energy resource that would protect the natural and biological environment in addition to cultural and socioeconomic resources.

Marine Mammals

Comments identified concerns for marine mammals, particularly due to their distribution throughout the Lease Area; migration routes; potential for habitat displacement; collisions with vessels; risk of entanglement; behavior and physiological impacts from noise and vessel traffic; and general sensitivity to construction activities that may result in harassment, injury, or mortality. Comments identified concerns regarding correlations of North Atlantic right whale strandings and offshore wind and effects from increased noise and sound waves from seabed exploration, construction, and wind turbine function. Comments encouraged the use of site-specific data, best available science, and local data sources to support impact determinations on marine mammals from wind farm activities. Comments also urged BOEM to consider, avoid, and mitigate effects to marine mammals, particularly the critically endangered North Atlantic right whale.

Comments stated that the EIS should include a complete evaluation of the immediate and cumulative effects of the Project as well as the effects of all proposed and potential wind development in the region. Comments also requested that the EIS include alternatives to avoid development of offshore wind in seasonal management areas, to implement the NMFS-recommended conservation buffer along the western edge of the Nantucket Shoals, and to minimize the use of high-value habitat.

Comments specifically requested that impacts to North Atlantic right whales be minimized and mitigated to the full extent practicable due to their sensitivity to noise. Additionally, commenters requested that BOEM work with NMFS and other relevant agencies, in conjunction with the Northeast and Mid-Atlantic Ocean Data Portals to ensure a high level of transparency in all data collected throughout offshore wind development, including data from offshore wind-associated vessels, aerial surveys, protected species observer (PSO) reports, and passive acoustic detections.

A range of mitigation measures was recommended in comments to minimize the risk of habitat degradation, vessel strike, and exposure to potentially harassing or injurious levels of noise to marine mammals, including the following:

- Seasonal restrictions to avoid construction during periods of high migration and during known transit periods of North Atlantic right whales through the Lease Area.
- Monitoring of the acoustic clearance and exclusion zone with the use of NMFS-approved PSOs and the use of passive acoustic monitoring with underwater recorders.
- Implementation of a speed restriction of 10 knots for all vessels operating within or transitioning to/from lease areas at all times except in limited circumstances where the best available scientific information demonstrates that whales do not use the area.

- Reporting the results of recent and ongoing marine mammal surveys within and adjacent to the Project footprint. Transparency and sharing the results of the studies with state and federal level agencies, stakeholders, and the public was emphasized.
- Implementation of studies to ensure commercially feasible and effective noise reduction to the fullest extent feasible.
- Requested assessments and studies for the impact of larger wind turbines on marine life, particularly the North Atlantic right whale. These assessments and studies to include use of passive acoustic monitoring, aerial surveys, and vessel surveys to determine presence and potential changes in migration, foraging, and mating behaviors.
- Reporting potential cumulative impacts on whale habitat and prey, including impacts to the Nantucket Shoals area and phytoplankton.
- Creation of a scientifically validated baseline of studies for 3 to 5 years prior to construction.

Mitigation

Commenters requested that the EIS identify which mitigation measures are included and evaluated as part of the Proposed Action and identify additional mitigation measures and classify them as required or optional. Commenters stated that the EIS should provide information on how mitigation measures are considered in the context of the effects level (negligible, minor, moderate, major), how mitigation would offset those levels, and the effectiveness of any proposed mitigation. Commenters requested that BOEM make every effort to demonstrate compliance with Council on Environmental Quality regulations in 40 Code of Federal Regulations 1508.1(s) and the NOAA Mitigation Policy for Trust Resources (NAO 216-123, Section 3.06) by evaluating measures to avoid and minimize adverse impacts before compensatory mitigation is considered.

Several comments stated the EIS should include a comprehensive monitoring program for monitoring at multiple scales, as follows:

- Taking an ecosystem-based approach for fisheries, habitat, and protected species, including chemical and sonic monitoring and an assessment of physical alteration of the seafloor, currents, and winds.
- Visual and acoustic surveys for protected species.
- Biological/ecological surveys for plankton abundance and marine wildlife presence and abundance.

Comments stated the monitoring plan should require Vineyard Northeast to conduct the necessary preconstruction, construction, and postconstruction monitoring of benthic habitats and associated flora and fauna to detect any physical changes and impacts to these habitats and species that occur due to Project activities or components.

Specific recommendations include the following:

- Mitigate obstructions to fish passage and habitat disturbance due to cables and cable protection by burying cables deeper, reducing EMFs, and using nature-inclusive cable protection such as ecological/bioactive concrete. In areas where EMFs cannot be reduced, monitoring of EMF-related impacts should be included.
- Support and fund habitat restoration projects to offset habitat loss or degradation.

- Implement time-of-year restrictions for Project activities to minimize impacts on spawning and juvenile development of aquatic species, both onshore and offshore.
- Adopt comprehensive monitoring and mitigation measures for marine mammals/North Atlantic right whale, including clearance and exclusion zones; shutdown activities if marine mammals are visually or acoustically detected; enforce 10-knot vessel speed restrictions; enforce time-of-year and time-of-day restrictions on pile driving; limit underwater noise; employ robust monitoring protocols during pre-pile driving clearance and when pile driving is underway; conduct mandatory reporting of all visual and acoustic North Atlantic right whale sightings; and employ distance restrictions for vessels when marine mammals are present.
- Include a response plan for unintended/unforeseen effects on the marine environment and wildlife, including thresholds for modification of Project scope and duration and a threshold for decommissioning should unexpected effects occur.
- Include mitigation measures when seasonal management areas or persistent dynamic management areas cannot be avoided.
- Station PSOs at the pile-driving site with additional vessels with at least four observers each to monitor the entire clearance zone. Consider infrared technology and drones to supplement observers. Acoustic and visual monitoring should begin at least 60 minutes prior to pile-driving initiation, and visual observation of the clearance zone should continue 30 minutes after pile driving has commenced.
- Assess measures to mitigate impacts from open-loop cooling systems, including locating the ESP/cooling station outside of the 10-km buffer or 30-meter (m) isobath from Nantucket Shoals and analyzing the feasibility and mitigation of a 20-km buffer from Nantucket Shoals. Monitoring plans, including entrainment and impingement studies and thermal discharge monitoring, should be included.
- Include monitoring plans for Atlantic cod and other overfished species; these plans should cover areas that have been designated as juvenile cod HAPC and areas with complex habitats that support spawning cod. Monitoring should include passive acoustic monitoring of vocalizations during cod spawning periods. The plans should include prohibitions on any Project activities with seafloor disturbance if cod spawning is detected within the Project footprint.
- Mitigate impacts to local residents along the Westport River and Horseneck Beach and environmental justice communities.

National Environmental Policy Act Process

NEPA process comments addressed the way in which the EIS is prepared. Typical comments under this topic covered NEPA regulatory requirements; the scoping process; public meetings, notification, or other involvement; alternatives development; resources for analysis in the EIS; consultation with agencies, state historic preservation officers, and/or Native American tribes; or other procedural issues, including agency federal consistency reviews. It was stated that close coordination with the U.S. Army Corps of Engineers, NMFS, appropriate state coastal zone management offices, EPA, U.S. Fish and Wildlife Service, and others would be essential for portions of the Project that falls under each agency's jurisdiction.

Several state and federal agencies welcomed the opportunity to serve as a cooperating or participating agency under NEPA in their comment submission.

As part of the NEPA process for the Project, commenters encouraged BOEM to do the following:

- Complete an expeditious and thorough environmental review of the Project.

- Work with applicable agencies to align the BOEM NEPA process with associated federal consistency review processes so the Draft EIS would be available to inform the federal consistency decision.
- Notify agencies of any changes to the COP with a description of the changes, and ensure information is complete at the start of a review period to avoid the need for multiple reviews later and potential delays. This includes both Phase I and Phase II of the Project receiving thorough and separate NEPA analyses.
- Make a reasonable attempt to obtain and disclose data necessary to support the analysis of potential environmental impacts from the Project, including publishing timely updates to the Federal Register for public notification.
- Apply lessons learned from past projects to the Project and future development, and review these lessons to alleviate the number of projects that stakeholders must review and comment on.
- Develop and communicate a Project approval timeline so stakeholders and local businesses can plan according to the Project development schedule.
- Apply best practices for community engagement and disclosure to the public to reduce conflict while using a community-based model.
- Evaluate decommissioning in the EIS for environmental, financial, and legal concerns.
- Coordinate with fishery management and scientific subject matter experts on the Project's potential impacts in addition to state and federal agencies.

Navigation

Comments related to navigation requested the EIS assess traffic and transportation impacts, with moving components (vehicles/vessels) via land and/or water, on navigation and shipping lanes, search and rescue capabilities, commercial and recreational fishing, military use, air traffic, and recreational uses. One commenter suggested fishing economics, product quality, markets, fisheries management, and living marine resources may benefit from migration corridors created by transit lanes. One comment highlighted the concern that the Project would interfere with radar signals used for navigation by military helicopters, which would prohibit search and rescue and defense efforts, and requested inclusion of an emergency safety plan, including public safety and national defense be included in the EIS.

Comments claimed that BOEM and the U.S. Coast Guard's analysis of fishing vessel transit in proposed lease areas to date was inadequate. Comments claimed the 1 × 1-nm turbine spacing without additional transit corridors was neither requested nor agreed upon by fisheries experts and operators, and that safe transit lanes need to be at least 4 nm. The commenter also requested that alternative turbine spacings beyond the uniform 1 × 1-nm spacing design be analyzed.

Other Marine Uses

The other marine uses resource includes seven subtopics analyzed in the EIS: aviation and air traffic, land-based radar, marine mineral resources and dredged material disposal, military and national security, scientific research and surveys, search and rescue, and undersea cables.

Comments related to other marine uses expressed concerns over national security and potential interference the windmills have on radar, and whether unexploded ordinance would be encountered in the Lease Area, and if so, what management strategies would be implemented to avoid environmental impacts.

Concerns over NOAA scientific surveys that would be affected by the Project through preclusion of survey platforms, a change in altitude of flights, and/or a change in habitat were also raised. Comments suggested that the Affected Environment section of the EIS should include a description of scientific surveys to be impacted; the history of each time series; and the relative importance of the impacted scientific surveys on management advice, decision-making, and other end-users. According to the comment, the following NOAA surveys would be affected by the Project:

- Atlantic Marine Assessment Program for Protected Species (aerial and by vessel)
- Multi-species bottom trawl survey (fall and spring)
- Ecosystem monitoring survey
- North Atlantic right whale survey
- Ocean quahog survey
- Scallop survey
- Sea turtle ecology survey
- Seal abundance survey

According to the comment, impacts to these surveys would include the following:

- Impacts to safe navigation and safe and effective deployment of mobile survey gear in the wind development area as well as exclusion of sampling platforms from the wind development area.
- Impacts on the random-stratified statistical design that is the basis for data analysis and use in scientific assessments, advice, and analyses.
- Impacts to benthic and pelagic habitats, and airspace in and around the wind energy development area.
- Potential reductions in sampling outside wind development areas.

Comments stated that mitigation identified to offset negative impacts to survey operations (e.g., loss of access to the Project areas, changes to sampling design, habitat alterations, and reduced sampling due to increased transit time) and fisheries-dependent data collections should be consistent with the NMFS and BOEM federal survey mitigation strategy (Hare et al. 2022).

Public Involvement

Comments noted the importance of stakeholder and public communication and involvement in the NEPA process. Several comments commended BOEM on appropriate levels of engagement with labor organizations, tribal nations, systematically marginalized and low-wealth communities, communities of color, and the public. These commenters encouraged BOEM to continue with their engagement. Other commenters claimed that BOEM had not adequately communicated with the public and with relevant stakeholders and requested that BOEM increase communication regarding the Project and increase advertising for public meetings. One comment suggested that BOEM send postcards to all residences within the potentially affected areas and to pass those costs on to the developer.

One comment stated that the task force established to help identify and define the Lease Area did not include all relevant stakeholders, such as all New England states and federal fisheries. Comments requested the inclusion of the following specific stakeholders in the continued discussion and review of the Project:

- Responsible Offshore Science Alliance.
- Regional Wildlife Science Collaborative.

- A member of the Southern New England Fisherman and Lobstermen’s Association to be recruited to serve as a Connecticut representative on the Vineyard Northeast Fisheries Representative Panel.
- New York stakeholders, such as fishermen and port users, in areas with potential construction/staging ports in New York.

Comments noted the confidentiality of some COP appendices and encouraged BOEM to provide increased transparency and an explanation for any information redacted or classified as confidential. This comment also recommended that BOEM make as much information as possible publicly available to improve transparency and access to Project information, which would support the value of the NEPA process.

One comment requested transparency about the entities that would be operating the Project if the Project were to be sold after construction by the developer and requested BOEM’s assistance at the town level to navigate any agreements with the developer regarding onshore components.

One comment requested that BOEM ensure messages from officials to the public are consistent with information presented by the developer in public meetings.

Comments were received that stated support for the open-house-style meetings and the information provided in the handouts and posters. Comments were also received that stated opposition to the open-house-style meetings and requested town-hall-style meetings with formal presentations and comment sessions with microphones. Commenters also requested that more information be easily accessible.

Purpose and Need

Comments that related to the purpose of and need for (purpose and need) the Project itself (i.e., the justification for constructing and operating the Project) were split between support and opposition.

In support of the Project, in terms of the purpose and need, commenters stated that the Project would contribute to federal, state, and local clean/renewable energy goals; mitigate climate change; reduce global greenhouse gas emissions; enhance the reliability and diversity of regional energy supplies; create jobs and economic opportunities; benefit local air quality; and benefit sea level rise and shoreline protection.

In opposition to the Project, in terms of the purpose and need, commenters stated that the purpose and need must not predetermine the agency’s decision process and should not include profit goals of utility companies or state-specific clean energy goals and should instead focus solely on NEPA and the Outer Continental Shelf Lands Act. Comments also stated that the use of “unknown, unproven, anticipated” future impacts to climate change cannot be used to justify the need for the Project.

Other general purpose and need comments included disagreement with the need for increased energy supply based on a belief that the American population is declining.

Recreation

Comments regarding recreation included concerns over the impacts to recreational navigation and the impacts of underwater cables on recreational fishing.

Comments stated concerns over the landfall sites, which are classified as Land and Water Conservation Fund State Assistance Program sites. Specific concerns included cables landing on Horseneck Beach, a high energy surf zone. One commenter expressed concern for risks to swimmers, fishermen, tourists, and boaters due to a belief that sharks are attracted to EMF and bird and bat carcasses, both associated with turbine operations.

Sea Turtles

Comments specific to sea turtles requested that mitigation measures be implemented to protect and better understand the risks to sea turtles. Commenters made suggestions on data collection techniques to improve surveying, mitigation, avoidance, and estimates of sea turtle takes. Recommendations for noise and vibration impacts analysis and mitigation measures were also included in one of the comments. One commenter recommended that no fewer than four PSOs should be available to monitor sea turtle exclusion zones, and that multiple PSOs must be stationed at several vantage points at the highest level to allow each to continuously scan a section of the exclusion zone.

Socioeconomics

Socioeconomic comments expressed support of the Project and benefits related to jobs, local and regional businesses and economies, community revitalization, lower energy costs for residents, and increased tax revenue. Socioeconomic comments expressing opposition to the Project included concerns regarding lower property values, lower tax revenues, and higher energy bills.

Comments noted the need for a robust analysis of socioeconomic impacts associated with the COP and in compliance with NEPA that would encompass demographics, employment, and economics. Specifically, commenters recommended the following items for inclusion in the EIS:

- Applicant commitments surrounding the use of domestic content, project labor agreements, community benefits agreements, use of registered apprentices and other labor-management training programs, protection against worker misclassification and wage theft, union neutrality agreements, local hire, and the prevailing wage.
- Analysis of direct, indirect, and induced job creation and job quality impacts and benefits using the U.S. Department of Labor's Good Job Principles' job and equity metrics.
- Evaluation of programs necessary for training and expanding the domestic workforce, particularly for displaced workers and workers from environmental justice communities. This should include wages, hours, career advancement, physical demands, and safety information.
- Evaluation of local communities' access to jobs in terms of language access needs and specialized experience requirements, such as overseas training.
- Inclusion of information regarding material quality, standards, and certifications needed to secure a supplier contract as well as information on components that would be manufactured internationally.
- Inclusion of peer-reviewed information regarding the economic costs and benefits of offshore wind and transparent economic reports.
- Estimates of the number of jobs that would be sourced from local communities.

Technical Editing and Document Structure

Two comments were received related to technical editing and included these recommendations:

- Do not use abbreviations unless the abbreviations are generally recognized and understood.

- Provide page numbers and hyperlinks.
- Do not use colors to depict overall impact, use words.
- Do not refer to an appendix without providing a hyperlink.
- Do not use type that is smaller than 10 points.
- Do not give a range of impacts without percentages, probabilities, or a final overall impact assessment determination.

Visual Resources

Comments expressed concerns about the accuracy of the visual simulations. Commenters stated a belief that the proposed height of the WTGs in the COP would be visible up to 50 miles away and claimed that the visual simulations were “false” representations. Commenters made these requests regarding the visual simulations:

- Have photograph representations taken on clear, dry days.
- Have simulations account for the turbine height proposed in the COP.
- Have the camera focus on the horizon line as opposed to the foreground.
- Have viewshed simulations publicly available.
- Have simulations represent the worst-case/highest visibility scenario and show the range of visibility under a variety of conditions, including at night with nighttime lighting to assess impacts on night skies, including lighting required for offshore substations.

Water Resources

Water quality comments generally addressed concerns over the use of cooling water systems for the offshore components, over sedimentation, and over water pollution.

For cooling water systems, comments requested that the EIS include the following:

- Analysis of both an open- and closed-loop system.
- Quantification of the gallons of seawater used per day and the temperature increases at the discharge as well as the effects of any additives in the effluent.
- Analysis of entrapment, entrainment, and impingement on biota due to the cooling water system, including effects on fish populations.
- Spatial analysis of the thermal plume.

In terms of sedimentation, comments requested that the EIS include the following:

- Analysis of turbidity and suspended solids that may result from sedimentation during cable laying.
- Analysis of the potential for the re-suspension of heavy metals that may exist within the sediment.
- Analysis of effects of the cables crossing the Westport River in terms of sediment deposition within the river and water exchange between the river and the ocean.

In terms of water pollution, comments requested that the EIS include the following:

- Assessment of the quantities and composition of pollutants to be used and discharged over construction and operation of the Project, their potential to bioaccumulate in the environment, and their potential to be transported to areas beyond the immediate point of discharge.
- Analyses to include plastics, deoxygenation, and algal blooms.
- Examination of stormwater runoff potential at the offshore ESPs and a discussion on stormwater management.

Additionally, comments requested that the EIS describe how the Project will comply with marine water quality criteria and be consistent with all federal authorities regulating vessel discharges.

Waters of the United States

Commenters stated regulatory requirements for the EIS to document compliance with the Clean Water Act Section 404 and clearly outline any direct and indirect effects, both temporary and permanent, to wetlands and waters. Comments also requested the identification and mapping of all water resources (i.e., wetlands, vernal pools, streams, rivers, and waterbodies) that would be affected by the onshore cable routes as well as a study analyzing the resources in Westport Harbor and the Westport River.

Several comments focused on the effects analysis and measures for avoidance, minimization, and mitigation, including the following:

- An evaluation of ways in which each alternative can be designed to avoid, or, where unavoidable, minimize direct and indirect impacts to wetlands and other waters, and that the evaluation of direct and indirect impacts should fully consider both temporary and permanent impacts.
- An evaluation of indirect impacts such as clearing impacts for the proposed terrestrial construction activities resulting in permanent or temporary wetland cover type conversions and water quality, erosion, and sedimentation impacts to wetlands and waterbodies.

Overall, commenters were concerned with construction effects on wetlands and encouraged onshore cable routes that use existing roads, rights-of-way, and other areas that have been previously disturbed.

Wildlife (general)

Comments identified a range of potential Project impacts to biological resources to be considered during EIS preparation. These topics included potential behavioral and physiological impacts from habitat alteration; water quality; EMFs; and construction and operation of the Project components, both onshore and offshore. Comments raised concerns about the onshore cable routing and stated that the EIS should identify measures that minimize individual and population-level impacts to biological resources, such as routing to avoid sensitive habitat areas. In particular, comments expressed concern with the Horseneck Beach landing site stating that the proposed cable route would disrupt nesting grounds for roseate tern and piping plover and the freshwater trout fishery within Boiling Springs Creek. Comments also stated general concern for oysters, eelgrass beds, migratory nesting birds, benthic infauna, and freshwater fisheries. One commenter expressed concern over effects on insect populations caused by insect collisions with wind turbine blades and requested this to be discussed in the EIS.

Commenters requested the EIS do the following:

- Evaluate wildlife cumulative impacts of project construction, operation, and decommissioning with other offshore wind projects.

- Include a species-by-species analysis of effects from Project construction and operation for protected species and adopt a precautionary approach where species are at risk.
- Use the most up-to-date models and telemetry data for the analyses and provide transparency about data gaps and uncertainties.
- Analyze the Project's effects on biodiversity loss, analyze the relationship between biodiversity loss and human health, and evaluate the cost/benefits of the Project in relation to biodiversity. The commenter indicated that the EIS should consider findings from the North Sea.
- Analyze the effects of habitat loss for marine species, especially those with high site fidelity, and offer evidence that other suitable replacement habitats exist, taking into account the cumulative habitat loss from other offshore wind projects and offshore activities.

Comments specific to a particular biological resource are discussed in their appropriate section in this report.

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APPENDIX A

List of Submission Identifications, Names, and Affiliations

Table A-1 lists the submission identification (ID), first and last names, and agency or organization affiliation (as appropriate) for each person who provided a scoping submission.

Table A-1. Scoping Contact Information

Submission ID	First Name	Last Name	Title	Organization Name*	Address 1	Address 2	City	State	Zip	Email
BOEM-2024-0009-0003	Jean	Publie					Flemington	NJ	088822	jeanpublic1@gmail.com
BOEM-2024-0009-0004	Anonymous									alejandro.meseguer@gmail.com
BOEM-2024-0009-0005	Anonymous									alejandro.meseguer@gmail.com
BOEM-2024-0009-0006	Anonymous									alejandro.meseguer@gmail.com
BOEM-2024-0009-0007	Jeffrey	Parker		Vineyard Power Cooperative						jeffrey.parker.a@gmail.com
BOEM-2024-0009-0008	Anonymous			Island Wind Inc.						tedbayne@comcast.net
BOEM-2024-0009-0009	Steven	White		University of Massachusetts*			New Bedford	MA	02740	swhite@umass.edu
BOEM-2024-0009-0010	Jeff	Gardner		Geo SubSea, LLC						jeff@geosubseaconsulting.com
BOEM-2024-0009-0011	Anonymous			Common Sense Environmental, Inc.						Cynthia@CommonSenseEnv.com
BOEM-2024-0009-0012	John	Bolger					Westport	MA	02790	Jjb0118jbb1@aol.com
BOEM-2024-0009-0013	C	Glaser								lotsofrocks@yahoo.com
BOEM-2024-0009-0014	Tanya	DeMello					Westport	MA	02790	simplytaste.full01@gmail.com
BOEM-2024-0009-0015	Brian	Pontolilo					Westport	MA	02790	bpontol@hotmail.com
BOEM-2024-0009-0016	Anonymous									kevinrod1983@gmail.com
BOEM-2024-0009-0017	Anonymous									d_gallant2013@live.com
BOEM-2024-0009-0018	Shilpy	Singh		New Bedford Maritime Innovations*			Newton Center	MA	02459	shilpy@newbedfordmaritime.com
BOEM-2024-0009-0019	Jess	M					Westport	MA		jessme35@hotmail.com
BOEM-2024-0009-0020	Jeff	Brault		Hornblower Group						jeffery.brault@cityexperiences.com
BOEM-2024-0009-0021	Susan	Starkey					Yarmouth Port	MA	02675	starkey.susan@gmail.com
BOEM-2024-0009-0022	Bruce	Bennett					Westport Point	MA	02791	redcedar032@gmail.com
BOEM-2024-0009-0023	Doug	Mentuck		Smith Wind						dmentuck@smithmarineinc.com
BOEM-2024-0009-0024	Jeffrey	Kominers					West Tisbury	MA	02575	jkkominers@al.com
BOEM-2024-0009-0025	Meghan	Gombos					Aquinnah	MA	02535	meghangombos@yahoo.com
BOEM-2024-0009-0026	Tyler	Soleau		Massachusetts Office of Coastal Zone Management	100 Cambridge Street	Suite 900	Boston	MA	02114	hollie.e.emery@mass.gov
BOEM-2024-0009-0027	Ann	Moberg					Westport	MA	02790	coppa3@charter.net
BOEM-2024-0009-0028	Carl	Moberg						MA	02790	coppa3@charter.net
BOEM-2024-0009-0029	Carl	Moberg						MA	02791	coppa3@charter.net
BOEM-2024-0009-0030	Joseph	Erwin					Westport	MA	02790	cdskipper@protonmail.com
BOEM-2024-0009-0031	Veronica	Bonnet		ACK Residents Against Turbines	PO Box 3057		Nantucket	MA	02584	veronicasonnet@gmail.com
BOEM-2024-0009-0032	Tim	Snyder		Northeast Clean Energy Council						tsnyder@neccec.org
BOEM-2024-0009-0033	Victoria	Leyden					West Greenwich	MA	02817	vleyden@gmail.com
BOEM-2024-0009-0034	Taryn	Macgregor					Block Island	RI	02807	
BOEM-2024-0009-0035	Katelyn	Richardson					Narragansett	RI	02882	katefin401@gmail.com
BOEM-2024-0009-0036	Anonymous									Rudy.m.pila@gmail.com
BOEM-2024-0009-0037	Mary	Mercer					Sharpsburg	GA	30277	elliemercer222@gmail.com

Submission ID	First Name	Last Name	Title	Organization Name*	Address 1	Address 2	City	State	Zip	Email
BOEM-2024-0009-0038	Anonymous			WhoPoo App*						
BOEM-2024-0009-0039	Fran	Karoff					Westport	MA	02791	karoffs@yahoo.com
BOEM-2024-0009-0040	Deborah	Weaver		Westport River Watershed Alliance	PO Box 3427		Westport	MA	02790-0703	director@wrwa.com
BOEM-2024-0009-0041	Bruce	Bennett					Westport	MA	02791	redcedar032@gmail.com
BOEM-2024-0009-0042	Todd	Cormier	P.E.		1004 Drift Road		Westport	MA	02790	
BOEM-2024-0009-0043	Veronica	Bonnet		Act for Whales			Nantucket	MA		
BOEM-2024-0009-0043	Veronica	Bonnet		Act for Whales			Nantucket	MA		
BOEM-2024-0009-0043	Veronica	Bonnet		Act for Whales			Nantucket	MA		
BOEM-2024-0009-0043	Veronica	Bonnet		Act for Whales			Nantucket	MA		
BOEM-2024-0009-0043	Veronica	Bonnet		Act for Whales			Nantucket	MA		
BOEM-2024-0009-0043	Sloane	Perras		Foss Offshore Wind						info@fossoffshorewind.com
BOEM-2024-0009-0043	Shilpy	Singh		New Bedford Maritime Association			New Bedford	MA		
BOEM-2024-0009-0043	Russ	Wotton		Operation Clean Sweep						
BOEM-2024-0009-0043	William	Eldridge		Peabody & Land Corporation	8 Essex Center Drive	3rd Floor	Peabody	MA	01960	ops@pealanecorp.com
BOEM-2024-0009-0043	Meghan	Lapp		Seafreeze Limited	100 Davisville Pier		North Kingstown	RI	02852	sales@seafreezeltd.com
BOEM-2024-0009-0043	Meghan	Lapp		Seafreeze Limited	100 Davisville Pier		North Kingstown	RI	02853	sales@seafreezeltd.com
BOEM-2024-0009-0043	Meghan	Lapp		Seafreeze Limited	100 Davisville Pier		North Kingstown	RI	02854	sales@seafreezeltd.com
BOEM-2024-0009-0043	Richard	Andre		Vineyard Power Cooperative			West Tisbury	MA		
BOEM-2024-0009-0043	Mike	Jacobs		Vineyard Power Cooperative			Martha's Vineyard	MA		
BOEM-2024-0009-0043	Fred	Murphy		Vineyard Power Cooperative			Martha's Vineyard	MA		
BOEM-2024-0009-0043	Kevin	Kertscher					New Bedford	MA		
BOEM-2024-0009-0043	David	Cole					Westport Point	MA		
BOEM-2024-0009-0043	Douglas	Nowacek								
BOEM-2024-0009-0043	Kurtis	Sensenig								
BOEM-2024-0009-0043	Sophie	Pittaluga								
BOEM-2024-0009-0043	Luke	Lefeber					Aquinnah	MA		
BOEM-2024-0009-0043	Craig	Dutra					Westport	MA		
BOEM-2024-0009-0043	Julius	Lowe					Martha's Vineyard	MA		
BOEM-2024-0009-0043	Sylvia	Lockwood								
BOEM-2024-0009-0043	Sylvia	Lockwood								
BOEM-2024-0009-0043	James	Dilks								
BOEM-2024-0009-0043	Kathleen	Harper								
BOEM-2024-0009-0043	Kathleen	Harper								
BOEM-2024-0009-0043	Kathleen	Harper								
BOEM-2024-0009-0043	Kathleen	Harper								
BOEM-2024-0009-0043	Kathleen	Harper								
BOEM-2024-0009-0043	Kathleen	Harper								
BOEM-2024-0009-0043	Kathleen	Harper								
BOEM-2024-0009-0043	Kathleen	Harper								
BOEM-2024-0009-0043	Chris	Stupack					Boston	MA		

Submission ID	First Name	Last Name	Title	Organization Name*	Address 1	Address 2	City	State	Zip	Email
BOEM-2024-0009-0043	James	Dilks								
BOEM-2024-0009-0043	James	Dilks								
BOEM-2024-0009-0043	James	Dilks								
BOEM-2024-0009-0044	Robert	Wood					Westport	MA		
BOEM-2024-0009-0045	John	Stella			PO Box 543		Bedford	MA	07730	
BOEM-2024-0009-0046	Robert	Daylor		Westport Citizen*	1800 Drift Road		Westport	MA	02790	
BOEM-2024-0009-0047	Matt and Jeanne	Girard			2 Hidden Glen Lane		Westport	MA	02790	
BOEM-2024-0009-0048	Robert	Wood			PO Box 3111		Westport	MA	02790	
BOEM-2024-0009-0049	Maurice	Elmay			PO Box 441		Westport Point	MA	02791	
BOEM-2024-0009-0050	Wendy	Dorsey		Town Resident*	56 Hillcrest Acres		Westport	MA	02790	
BOEM-2024-0009-0051	Lisa	Cambra			PO Box 3362		Westport	MA	02790	
BOEM-2024-0009-0052	Larry	Backman								larry.backman@comcast.net
BOEM-2024-0009-0053	Allen	Rencurrel	Captain	Westport Nantucket Sound Seafood LLC.*	515 Sanford Road		Westport	MA	02790	
BOEM-2024-0009-0054	Chris	Kaldy			5 Windward Way		Westport	MA	02791	
BOEM-2024-0009-0055	William	Lake		Aquinnah Climate and Energy Committee/Vineyard Power			Aquinnah	MA		
BOEM-2024-0009-0055	Garth	Patterson		Citizens for Citizens Incorporated						
BOEM-2024-0009-0055	Christopher	Clark		Cornell*						
BOEM-2024-0009-0055	Carl	van Warmerdam		Deep Sea Defenders						
BOEM-2024-0009-0055	Carl	van Warmerdam		Deep Sea Defenders						
BOEM-2024-0009-0055	Barbara	Chapman		Green Oceans				RI		
BOEM-2024-0009-0055	Constance	Gee		Green Oceans			Westport	MA		
BOEM-2024-0009-0055	Constance	Gee		Green Oceans			Westport	MA		
BOEM-2024-0009-0055	Constance	Gee		Green Oceans			Westport	MA		
BOEM-2024-0009-0055	Constance	Gee		Green Oceans			Westport	MA		
BOEM-2024-0009-0055	Katrina	Hamilton Gewirz		Green Oceans						
BOEM-2024-0009-0055	Constance	Gee		Green Oceans			Westport	MA		
BOEM-2024-0009-0055	Sophie	Krenn		HeliService USA, LLC						
BOEM-2024-0009-0055	Liz	McManamy		Protect Our Coast, Green Oceans			North Attleboro	MA		
BOEM-2024-0009-0055	Liz	McManamy		Protect Our Coast, Green Oceans			North Attleboro	MA		
BOEM-2024-0009-0055	Matt	Cadwallader		TerraSond						
BOEM-2024-0009-0055	Jennifer	Miksis-Olds		University of New Hampshire						
BOEM-2024-0009-0055	Victoria	Riskin		Vineyard Power			Martha's Vineyard	MA		
BOEM-2024-0009-0055	Jacob	McGuigan		Westport Conservation Commission			Westport	MA		
BOEM-2024-0009-0055	David	Sprogis								
BOEM-2024-0009-0055	Chris	Powicki					Brewster	MA		
BOEM-2024-0009-0055	Chris	Powicki					Brewster	MA		
BOEM-2024-0009-0055	Grove	Harris					Covell's Beach	MA		
BOEM-2024-0009-0055	Grove	Harris					Covell's Beach	MA		

Submission ID	First Name	Last Name	Title	Organization Name*	Address 1	Address 2	City	State	Zip	Email
BOEM-2024-0009-0055	Paul	Hebert					New Bedford	MA		
BOEM-2024-0009-0055	Art	Cilley								
BOEM-2024-0009-0056	Linda	Davis			796 Old Fall River Road		Darthmouth	MA	02747	
BOEM-2024-0009-0057	Charlotte	Duflamel			581 W. Main Road		Little Compton	RI	02837	
BOEM-2024-0009-0058	Luke	Walden		Mitchell College*	134 10th Street		Providence	RI	02906	
BOEM-2024-0009-0059	Anonymous									sgiltz@bluegreenalliance.org
BOEM-2024-0009-0060	Jason	Walsh		BlueGreen Alliance						
BOEM-2024-0009-0061	Josh	Kohut	Dr	Rutgers University and the Woods Hole Oceanographic Institution						kohut@marine.rutgers.edu
BOEM-2024-0009-0062	Dan	Kilpatrick					Shrewsbury	MA	1545	kilpard51@gmail.com
BOEM-2024-0009-0063	Bethany	Daniels					Wesport	MA	2790	bethanyd1975@gmail.com
BOEM-2024-0009-0064	Carroll	Brownlee					Wesport	MA	02790	brownlee7@charter.net
BOEM-2024-0009-0065	Timothy	Timmermann					Boston	MA	02109	timmermann.timothy@epa.gov
BOEM-2024-0009-0066	Lisa	Quattrochi Knight, M.D., Ph.D.		Green-Oceans						lisa@green-oceans.org
BOEM-2024-0009-0067	Gordon	Carr		New Bedford Port Authority			New Bedford	MA		john.regan@newbedford-ma.gov
BOEM-2024-0009-0068	Todd	MacGregor	Captain				Fairhaven	MA	02719	macatac.sportfishing@gmail.com
BOEM-2024-0009-0069	Jeffery	Willis		Coastal Resources Management Council	4808 Tower Hill Road, Suite 116,		Wakefield	RI	02879-1900	ksloan@crmc.ri.gov
BOEM-2024-0009-0070	Gib	Brogan		Oceana	1025 Connecticut Avenue, NW Suite 200		Washington	DC	20036	gbrogan@oceana.org
BOEM-2024-0009-0071	Kenneth	Adams					Rumford	RI	02916	kenadamsri@verizon.net
BOEM-2024-0009-0072	Lane	Johnston		Responsible Offshore Development Alliance			Sterling	VA	20166	lane@rodafisheries.org
BOEM-2024-0009-0073	Kisha	Santiago		New York State Department of State, New York State Department of Environmental Conservation, New York State Office of Parks, Recreation, and Historic Preservation	99 Washington Avenue		Albany	NY	12231	terra.haight@dos.ny.gov
BOEM-2024-0009-0074	Eric	Hammerling		Connecticut Department of Energy and Environmental Protection	None listed			CT		Linda.Brunza@ct.gov
BOEM-2024-0009-0075	Shayna	Steingard		National Wildlife Federation						
BOEM-2024-0009-0076	Anonymous			ECONcrete						aliza@econcrete.us
BOEM-2024-0009-0077	Kelt	Wilska		New England for Offshore Wind						zsaifee@environmentalleague.org
BOEM-2024-0009-0078	Michael	Pentony			55 Great Republic Drive		Gloucester	MA	01930	susan.tuxbury@noaa.gov
BOEM-2024-0009-0079	Johnathan	Meade			1234 Market Street	20th Floor	Philadelphia	PA	19107	Kristin_andel@nps.gov
BOEM-2024-0009-0080	Timothy & Victoria	Bridges			6 Ishmael Road		Nantucket	MA	02554	

* Organization name is provided for affiliation purposes. If the submission was not made on behalf of the affiliation, then that is denoted with an asterisk (*).