



SouthCoast Wind Energy LLC
101 Federal Street
Boston, MA 02110

February 22, 2023

Town of Falmouth
59 Town Hall Square
Falmouth, MA 02540

RE: Public Forum Follow-up

Dear Mr. Johnson-Staub,

Please see the attached Q+A document that provides responses to the questions and comments made during the June 8, 2022 public forum as well as other questions/concerns we have heard/received.

We are happy to answer any additional questions and look forward to continuing to work together.

Sincerely,

The SouthCoast Wind Team

Q+A

Why did SouthCoast Wind choose Falmouth Heights as the preferred landfall site?

Falmouth Heights was selected after years of intensive studies and evaluations of 10 grid interconnection options, 16 potential substation locations, 15 landfall locations (including 10 in Falmouth), 20 onshore cable route options, and 5 different offshore cable route options.

Routing analysis for the onshore transmission infrastructure takes into consideration multiple factors, including but not limited to the following:

- Available land able to accommodate infrastructure and construction
- Avoidance of existing infrastructure, including submarine cables offshore and underground utility cables/pipelines onshore
- Environmental considerations that avoid and mitigate impacts to wetland resource areas
- Avoidance or minimization of adverse impacts to environmental justice populations
- Overall length of the onshore export cable route
- Minimize traffic disruption to local roadways during construction
- A comparative route analysis with scoring based on the above considerations

The objective is to minimize impacts while aligning with safety, cost, and engineering considerations. Routing along existing utility rights of way, roads, previously disturbed areas, and cleared land are widely accepted as best practices.

The Worcester Avenue site met the requirements and provided the most direct route to interconnection with the electric grid. Central Park became the second, or “noticed alternative.”

During the summer and fall of 2022 we investigated additional landfalls recommended by the Town. Only one, Kite Park, was deemed feasible (though technically challenging) and was added as our second alternative, third overall.

During the very first stages of assessing cable landfall sites, what other sites did SouthCoast Wind consider, and why were they rejected?

As noted above, Falmouth Heights was selected after years of intensive studies and evaluations of 10 grid interconnection options, 16 potential substation locations, 15 landfall locations (including 10 in Falmouth), 20 onshore cable route options, and 5 different offshore cable route options.

Surf Drive Beach was intensively studied but was ruled out largely due to technical conflicts with existing Eversource/NSTAR cables/utility lines that provide a vital link to Martha’s Vineyard. A detailed Ampacity Modeling Report was provided to the Town of Falmouth officials on October 21, 2022, regarding the Surf Drive landfall location.

Kite Park along Grand Ave was considered early on as a landfall location in our siting studies. This landfall was initially set aside as it would require cable installation beneath privately-owned beach parcels. However, after

further engineering analysis, it has been added as the second alternative, third choice overall. A summary of SouthCoast Wind's alternative landfall engineering analysis was shared with the Town of Falmouth officials on October 27, 2022.

Falmouth Heights is a densely populated residential neighborhood that relies on its beaches to attract tourists, who are critical to the local economy. Why wouldn't this rule it out as an appropriate place to run a high voltage electric cable ashore?

The Falmouth Heights beach locations were selected after ISO New England's (ISO-NE), the operator of the regional electric grid, modeling confirmed the Upper Cape as an optimal point of interconnection into the regional electric grid and additional studies further demonstrated it to be the best option overall.

Construction work for the project would occur outside the high tourist season. There is no danger from the cables, which will be buried some 30-45 feet below the beach and between 3-9 feet below ground for the rest of the onshore route.

Similar cables exist on the Cape and in other parts of the northeast as well as around the world. There is no need for any change in habits or reduction in use of facilities or activities enjoyed by residents, businesses, or visitors along the cable route after construction.

SouthCoast Wind has a second cable connecting to Brayton Point in Somerset, just west of Fall River, the site of a former coal plant. Why does the project need two points of connection to the grid? Could SouthCoast Wind not just run larger cables through Brayton Point?

ISO New England (ISO-NE), the operator of the regional electric grid, has a planning requirement that limits individual points of interconnection to 1,200 MW. This ensures reliability of the system.

SouthCoast Wind's lease area is capable of generating up to an estimated 2,400 MW of capacity which, by ISO-NE rules, requires two individual interconnections of 1,200 MW each.

The number of places for grid interconnection in southern New England, which are near the offshore wind lease areas, are very limited and the competition from the many offshore wind developers for these few sites is strong. Further, the electric grid has not yet been updated sufficiently to accept all the renewable energy connections that are planned, which further limits options and increases competition.

Developers evaluate points of interconnection based on proximity, electric grid capacity, ISO-NE queue position availability, routing characteristics (soil/ sediment, environmental concerns, existing infrastructure, etc.) and the robustness of existing onshore transmission infrastructure. When projects can route efficiently and cost effectively to robust points on the grid, the savings are passed to ratepayers.

Is it possible to connect the cable through the Canal Generating Plant site in Sandwich? Has SouthCoast Wind had any conversations with the owner of that property? Is the project not pursuing that option because it would be more expensive?

Canal Station is in service and has obligations to the New England grid as a peak demand resource. As such, their grid connection lacks the capacity to meet the needs of the SouthCoast Wind Project.

Hypothetically, if you did connect at the Canal Generating Plant, would you or would you not need to build a substation similar to the to the one you are proposing in Falmouth?

SouthCoast Wind would be required to build a converter station onshore regardless of the interconnection point. The converter station converts power from High Voltage Direct Current (HVDC) to High Voltage Alternating Current (HVAC). This conversion is necessary because the regional electrical grid operates on alternating current (AC).

Industry analysts and academics point to the wisdom of building a centralized “ocean grid” that could connect offshore wind farms to each other and then run power through large undersea cables straight to coastal cities, rather than each wind farm landing its own smaller cables ashore in less populated parts of the coast. Is SouthCoast Wind involved in these discussions? Would the company consider delaying or aborting your plans to connect in Falmouth if the "ocean grid" concept gained significant traction—why or why not?

Currently, the U.S. Department of Energy and the Bureau of Ocean Energy Management are assessing various offshore transmission technologies and requesting information on offshore transmission innovation.

The ocean grid concept is a novel and potentially promising idea but it is still a concept and the estimated timeline for approvals, financing and constructing such a grid, as well as its onshore connections, is likely a decade or more out.

The demand for affordable, renewable energy is urgent and until the ocean grid concept is proven and approved by Federal and State regulatory authorities, we must continue moving forward with our projects to meet our obligations to supply clean energy to the residents and businesses of New England in accordance with Federal and State goals and legislative mandates. The US goal is 30,000 MW of offshore wind by 2030 and the Massachusetts statutory directive is to procure 5,600 MW by no later than June 30, 2027. To Date Massachusetts has procured 3,200 MW and is planning another procurement during 2023.

With respect to connecting to “Coastal Cities,” the Commonwealth of Massachusetts, as well as other states, and the federal government have enacted environmental justice policies that make clear that energy projects can no longer be thrust upon populations which have historically borne the brunt of hosting these common-good projects within their neighborhoods. Great care has been taken to avoid these communities to ensure environmental justice and equality for all.

Did SouthCoast Wind file a petition for exemption from all Falmouth regulations and by-laws with the Commonwealth of Massachusetts Department of Public Utilities?

SouthCoast Wind did not file “a petition for exemption from all Falmouth regulations and by-laws with the Commonwealth of Massachusetts Department of Public Utilities.”

SouthCoast Wind did file for exemptions to specific aspects of Falmouth’s Zoning Bylaws as it relates to unique circumstances with select Project scopes. The details of those exact requests, and why relief from the bylaws is required, can be found at the following link and a chart that summarizes each exemption request starts on page 49 (<https://fileservice.eea.comacloud.net/FileService.Api/file/FileRoom/14205954>).

SouthCoast Wind also asked for a “comprehensive zoning exemption” (see page 54 at the link above). The word “comprehensive” in this case does not mean “all-encompassing,” which may be what is causing confusion.

The comprehensive zoning exemption relates to future zoning changes, not in place today that could impact the project. In other terms, it’s a type of grandfather clause. As laws are always open to interpretation, if a future attorney decides they have a different interpretation of an existing zoning bylaw that has already been determined not to be applicable to the project, they cannot use a new interpretation to impede progress of the project once it is approved. This latter use is allowed because energy projects, once approved, are deemed necessary for electric reliability and security and any impediment to their progress could have negative consequences to the public good.

Also, to be clear, SouthCoast Wind must and will work with the Town with respect to Article 97. That is separate from zoning.

Will there be any health risks that preclude the community from safe enjoyment of the parks?

The community will be able to safely enjoy and utilize Worcester Park once construction is complete. The park will be returned to the same or better condition as it was found. The extremely low static magnetic field levels associated with the SouthCoast Wind project will be substantially lower than the established health-based guidelines for public exposure to EMF.

Scientists have not identified any confirmable chronic health risks for the weak steady EMFs associated with underground HVDC power transmission. This is consistent with the fact that humans have lived for tens of thousands of years in the presence of the earth's DC geomagnetic field, which is not known to adversely interact with biological processes or to directly affect human health.

Will existing trees, shrubbery, walking paths, public benches, and flagpole on the parks be permanently removed?

Benches and flagpoles would be temporarily removed and safely stored during the construction period. Worcester Park would be re-landscaped and returned to the same or better condition post-construction.

Will Worcester Park be accessible to the community at the conclusion of proposed construction taking place at Falmouth Heights?

Yes. The transmission cables will be buried underground. At the conclusion of construction, the only evident features for these underground cables would be a few manhole covers flush with the ground. Once the

construction is complete, Worcester Park would be returned to the community in the same or better condition, and available for recreational use.

Will the installation of the electric cables have an impact on the values of the neighboring properties?

It is anticipated that the project will not adversely impact the value of the neighboring properties.

Will the underground electric cables preclude homeowners from securing a mortgage?

The FHA loan guidelines for electric power lines apply only to overhead transmission lines, not underground electric transmission cables. Accordingly, underground electric cables are not expected to preclude homeowners from securing a mortgage. See: [Minimum Property Standards for Power Lines and Access to Property \(fha.com\)](https://www.fha.com/minimum-property-standards-for-power-lines-and-access-to-property)

Will the underground electric cables generate any noise?

No, the underground transmission cables will not produce any noise.

How often will the underground electric cables require servicing?

The cables will be buried and are not expected to require regular maintenance. Occasional testing and visual inspection may be performed at manhole access points only.

When the underground cables require servicing, will access require digging up the parks?

No, the activities will be able to be performed from manhole access points.

Will hazard signs be required at Falmouth Heights beach, Worcester Park or Central Park?

No, there will be no need for hazard signs at the selected landfall location in Falmouth. SouthCoast Wind will utilize horizontal directional drilling for cable installation, allowing the cable to be buried deep underneath the beach, therefore mitigating any probability of any hazard such as an anchor strike.

What will the light pollution from the converter station be?

SouthCoast Wind will keep lighting at the onshore converter station to a minimum and will work with the Town to ensure the lighting scheme complies with local requirements. Only a few lights will be illuminated for security reasons on dusk-to-dawn sensors and other lights will utilize motion-sensing switches. The majority of lights will be switched on for emergency situations only and will not be used on a regular basis. Task lighting during construction and maintenance activities will only be used as needed and manually switched on.

Is the aquifer under the Cape Cod Aggregates site at risk of contamination?

It is not anticipated that any Project-related spills would occur. However, if an emergency such as a spill did occur, SouthCoast Wind will have a plan in place to control the spill, mitigate impacts, and protect environmental resources. SouthCoast Wind's HVDC converter station will include a secondary containment system capable of fully capturing fluids including dielectric fluids (fluid is required for some of the equipment and in small quantities) in conformance with the Spill Prevention, Control and Countermeasures (SPCC) regulations (40 Code of Federal Regulations Part 112).

SouthCoast Wind will prepare a site-specific SPCC Plan. SouthCoast Wind will also include a spill response in its emergency response plan as part of the Project's overall safety management system. Appropriate spill containment kits and spill control accessories will be strategically situated at the selected substation. All operators will be trained in the use and deployment of such spill prevention equipment.

How will SouthCoast Wind mitigate noise from the HVDC converter station?

As the converter station design is developed, noise is a key consideration. The converter station equipment and layout will be selected and oriented to minimize noise. SouthCoast will work to minimize noise impacts through the use of multiple strategies that may include low-noise transformers, housing or enclosing of certain converter station components, as well as sound barriers. SouthCoast Wind will comply with the Massachusetts Department of Environmental Protection Noise Policy, including the 10 dBA limit at nearby residences and avoidance of 'pure tones.' The requirements of the Town of Falmouth Zoning Bylaw, Chapter 240 Article 9.8D Section (7) are more stringent than the Mass DEP Noise Policy. SouthCoast Wind has committed to abide by the more stringent Town of Falmouth 6 dBA increase limit as a good neighbor gesture.

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