



TOWN AND COUNTY OF NANTUCKET

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April 30, 2018

Bureau of Ocean Energy Management
Office of Renewable Energy Programs
45600 Woodland Road (VAM-OREP)
Sterling, Virginia 20166

INITIAL WRITTEN COMMENTS FROM THE TOWN OF NANTUCKET

RE: Public Scoping for the Draft Environmental Impact Statement for the Vineyard Wind Offshore Wind Energy Project

To Whom It May Concern:

The Town of Nantucket appreciates the opportunity to provide comments on the Vineyard Wind Offshore Wind Energy Project to the Bureau of Ocean Energy Management. As an island community, most vulnerable to the effects of climate change and rising sea levels, the Town of Nantucket supports viable, renewable energy projects—assessed to be competitive and reasonable, which support long-term price stability with the least economic impacts for local ratepayers.

In reviewing the Vineyard Wind Construction and Operations Plan, we have identified three topics of concern that could potentially impact our local community, economy, and environment, for which we offer the following comments:

1. Nighttime Lighting System

In order to preserve and protect Nantucket's nighttime environment and our heritage of dark skies, we strongly urge the use of FAA-approved "Aircraft Detection Light Systems" (ADLS), as the most environmentally-responsible lighting option.

In 2005, Nantucket adopted a lighting bylaw specifically "to preserve the rural nature of the countryside, enhance nighttime enjoyment of property, to protect property values by controlling light trespass, and to enhance the enjoyment of the night sky."

Strobing or blinking nighttime lighting systems, as are standardly installed on wind turbine generators (WTGs), are incongruous with Nantucket's lighting regulations

and will negatively impact the Island's cultural identity of historic and environmental preservation.

In selecting nighttime lighting systems for the wind turbine generators, it is imperative to balance the need for safety with the importance of protecting the Island's dark sky qualities, which significantly contribute to Nantucket's unique historical character and astronomical heritage.

The ADLS is designed to mitigate the impact of nighttime lights by deploying a radar-based system around a wind farm, turning lights on only when low-flying aircraft are detected. This smart activation feature allows aviation lights to remain off for an average 98% of the time, which makes this type of system the safest, most effective, and appropriate nighttime lighting solution for the Vineyard Wind project.

2. Daytime Visual Impacts

Nantucket's economy is seasonal in nature and tourism driven. Not only are visitors attracted to the Island's preservation of historic buildings, places, and districts, but also to its world-class, public beaches.

We are therefore sensitive to any potential visual impacts to the ocean horizon and sunset views, especially from the Island's southern coastline: from Madaket Beach in the west to Sconset Beach in the east.

To minimize the daytime visual impacts of the multiple wind turbine generators, which may result in negative local impacts to the character of the Island, we urge the following considerations:

- a. Reduce the development footprint by moving the first rows of turbines further from Nantucket's shore. In referencing the map of the "Wind Development Area for COP Review," we strongly advocate for the developer to relocate the closest thirteen WTGS from the first three rows, to the rear of the development area (see enclosed map markings). This design modification of essentially "pushing back" the closest, most visible WTGs from Nantucket, would minimize the local visual impact, without reducing the power output potential of the lease area.
- b. Defer development of the closest WTGs to allow technological advancements that could lessen the visual impacts. Based on public feedback of the visual simulations, we understand that that the most negative reactions to the WTG visuals are primarily associated with the *number* of turbines visible from the coastline, and not necessarily the size of the turbines. With the prospect of larger turbines (10-12MW) being available to developers in the near future, a lesser number of turbines will soon be required in order to achieve the same power output. **We therefore strongly urge Vineyard Wind to defer the development of the lease area closest to Nantucket to allow for the future construction of fewer visible turbines.**

3. Engagement of Nantucket Historical Review Boards in the Massachusetts Historical Commission Project Review

At over 30,000 acres, the Nantucket Historic District, which encompasses the entire island of Nantucket as well as the islands of Tuckernuck and Muskeget, is the largest conventional “National Historic Landmark District” by area in the contiguous United States. The Island’s historic distinction is recognized in the National Register of Historic Places, the Massachusetts State Register of Historic Places, and the Inventory of Historic and Archaeological Assets of the Commonwealth.

Since 1955, the Nantucket Historic District Commission (HDC) has played a central role in the “preservation and protection of the Island’s historic buildings, places and districts of historic interest through the development of an appropriate setting for these buildings, places and districts and through the benefits resulting to the economy of Nantucket in developing and maintaining its vacation-travel industry through the promotion of these historic associations.”

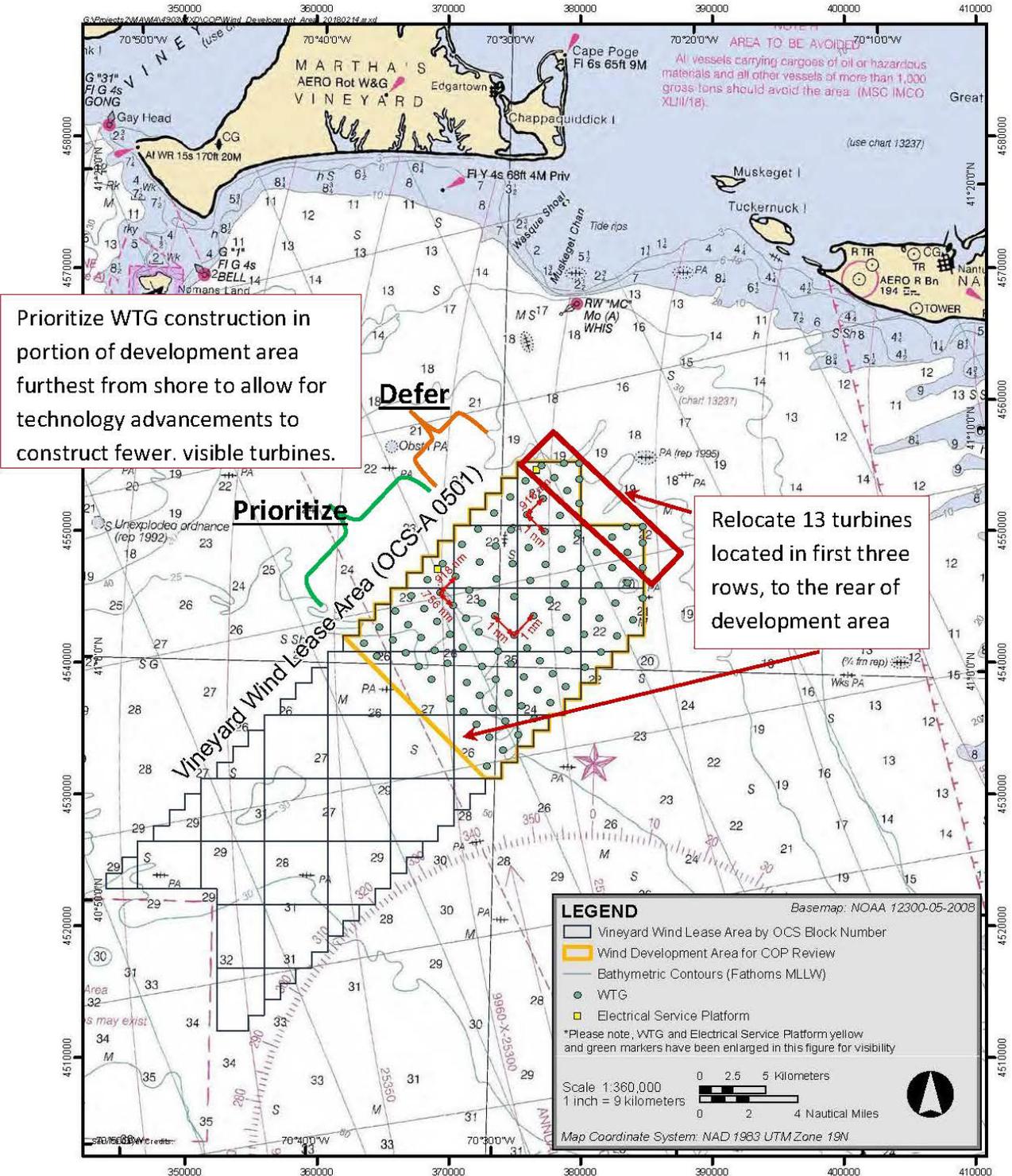
Due to the high cultural and historic sensitivity of the Island, and its proximity to the development site and cable routes, we strongly urge that Nantucket’s historical and cultural review boards and stakeholders, such as the Nantucket HDC and the Nantucket Historical Commission, be consulted and engaged in any historic or archaeological review process of the Project.

We appreciate the opportunity to weigh in on this matter and look forward to engaging in productive efforts and discussions with Vineyard Wind, BOEM, and other stakeholders to help advance clean, affordable, resilient energy projects in the Commonwealth, which align with Nantucket’s best interests.

Sincerely,



Jason Bridges, Chair
Nantucket Select Board



Vineyard Wind Project



Figure 3.1-2b
 Wind Development Area for COP Review