

Town and County of Nantucket
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Kristie L. Ferrantella
Rita Higgins



16 Broad Street
Nantucket, Massachusetts 02554

Telephone (508) 228-7255
Facsimile (508) 228-7272
www.nantucket-ma.gov

C. Elizabeth Gibson
Town & County Manager

September 4, 2019

Joanna Troy, Energy Policy & Planning Director
Eric Steltzer, Renewable Energy Division Acting Director
Massachusetts Department of Energy Resources
100 Cambridge St.; Suite 1020
Boston, MA 02114

Dear Ms. Troy and Mr. Steltzer:

As you know, the Massachusetts Department of Energy Resources (DOER) issued a Request for Proposals for Long-Term Contracts for Offshore Wind Energy Projects on May 23, 2019, with public proposals due by August 16, 2019. As DOER conducts its review of submissions, the Town of Nantucket requests that DOER and other evaluators pay heightened attention to proposals that are focused on finding ways to avoid or minimize harm to the Nantucket Historic District, a National Historic Landmark (NHL), as Section 110(f) of the National Historic Preservation Act requires.

Along with local stakeholders, the Town is currently participating as a consulting party in the Section 106 review process for the construction of the Vineyard Wind 1 project, located 14.7 miles from Nantucket. One of the lessons learned so far is that neither the Federal Bureau of Ocean Energy Management (BOEM) nor Vineyard Wind have given enough attention to their legal duty to minimize harm to Nantucket NHL status by using all possible planning to limit harm to our historic viewshed. Failure to address this problem on the front end has led to permitting delays and has impeded an efficient and effective planning process under federal environmental review laws.

It is especially alarming that Bay State Wind, if selected, has modeled plans for turbines up to 1100' tall (15MW), just 15 miles from Nantucket, which will nearly double the adverse visual effects and other cumulative effects that Nantucket residents will already bear by Vineyard Wind 1 alone. The DOER Offshore Wind Study, published May 31, 2019, does not adequately consider these issues. The Questionnaire did not include questions or opportunities to comment regarding adverse effects, such as visual impacts to historic properties and viewsheds.

To this end, we have attached the Town's most recent Section 106 Comments on BOEM's Revised Finding of Adverse Effect. Our comments address adverse visual effects to Nantucket and its historic and cultural resources in detail.

To be clear, the Town has consistently supported collective efforts to transition to cleaner energy sources. As a remote island, most vulnerable to the devastating impacts of climate change, Nantucket recognizes the urgency to reduce greenhouse gas emissions. However, as the second oldest and

largest historic district in the contiguous United States, we do not believe that our community must sacrifice its cultural heritage and historic assets in order to enjoy the benefits of renewable energy.

During this second RFP process, Massachusetts must not ignore the harm that will result to the island and its property owners from permitting largescale wind energy infrastructure projects so close to its irreplaceable historic places, such as Nantucket NHL, Nantucket Sound, and the Chappaquiddick Island Tribal Cultural Property. To do so at the expense of our unique visual character and cultural heritage will not advance the Commonwealth's goals for clean energy development, but rather impede it. Nantucket's sustainability must balance clean energy goals with our rich historic cultural identity; the island's past is its future and must be preserved and protected.

We urge the Commonwealth to consider requirements and best practice standards to minimize viewshed impacts, such as were recently included by the State of New York in their latest Offshore Wind RFP, in which Aircraft Detection Lighting Systems (ADLS) were required and turbines located within 20-miles of shore were discouraged. In our opinion, New York has set a fair, appropriate and responsible standard for siting offshore wind turbines by either avoiding or greatly minimizing adverse visual effects. Rather than maximizing harm to the Nantucket Historic District among other historic and cultural resources—which current leasing locations jeopardize by their close proximity—the Commonwealth should follow New York's lead in protecting these resources from the “Visibility and Viewshed Impacts” of neighboring offshore wind developments to the greatest extent possible.¹

Our local stakeholders would welcome the opportunity to discuss these issues with you and members of your staff. If you need information or have any questions concerning these comments, please contact Lauren Sinatra, Energy Coordinator at 508-325-5379 or LSinatra@nantucket-ma.gov.

Respectfully,



C. Elizabeth Gibson
Town Manager

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