

Vineyard Wind 1 Offshore Wind Energy Project

Final Environmental Impact Statement

Volume III



March 2021

Estimated Lead Agency Costs Associated with
Developing and Producing this Final EIS:
\$3,539,425

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**Vineyard Wind 1 Offshore Wind Energy
Project Final Environmental Impact Statement
Volume III**

March 2021

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Office of Renewable Energy Programs

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ENVIRONMENTAL IMPACT STATEMENT
FOR THE VINEYARD WIND 1 OFFSHORE WIND ENERGY PROJECT
DRAFT () FINAL (X) DRAFT SUPPLEMENTAL ()

Lead Agency: U.S. Department of the Interior, Bureau of Ocean Energy Management (BOEM), Office of Renewable Energy Programs

Cooperating Federal Agencies: U.S. Department of Commerce, National Oceanic and Atmospheric Administration, National Marine Fisheries Service
U.S. Department of Defense, Army Corps of Engineers
U.S. Department of Homeland Security, Coast Guard
U.S. Department of the Interior, Bureau of Safety and Environmental Enforcement
U.S. Environmental Protection Agency

Cooperating Tribal Nation: Narragansett Indian Tribe

Cooperating State Agencies: Massachusetts Office of Coastal Zone Management
Rhode Island Coastal Resource Management Council
Rhode Island Department of Environmental Management

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Area: Lease Area OCS-A 0501

Abstract:

This Final Environmental Impact Statement (FEIS) assesses the potential environmental, social, economic, historic, and cultural impacts that could result from the construction, operation, maintenance, and decommissioning of an approximately 800-megawatt offshore wind energy facility located more than 14 miles (23.6 kilometers) southeast of Martha's Vineyard. This Vineyard Wind 1 Offshore Wind Energy Project (Project) is proposed by Vineyard Wind LLC and designed to serve demand for renewable energy in New England. The FEIS was prepared following the requirements of the National Environmental Policy Act (42 United States Code [U.S.C.] §§ 4321–4370f) and implementing regulations. This FEIS incorporates analyses in the Supplement to the Draft Environmental Impact Statement (SEIS) addressing reasonably foreseeable offshore wind activities and their effects, previously unavailable fishing data, a new transit lane alternative, and changes to the proposed Project made by Vineyard Wind LLC. The FEIS also addresses comments received during the Draft Environmental Impact Statement (DEIS) and SEIS comment periods. The FEIS will inform BOEM in deciding whether to approve, approve with modifications, or disapprove the proposed Project. Cooperating agencies may also rely on the FEIS to support decision making if they determine the analysis is adequate for that purpose. BOEM's action furthers U.S. policy to make the Outer Continental Shelf energy resources available for development in an expeditious and orderly manner, subject to environmental safeguards (43 U.S.C. § 1332(3)), including consideration of natural resources and existing ocean uses.

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APPENDIX K PART 1

Public Comments and Responses

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APPENDIX K. PUBLIC COMMENTS AND RESPONSES

K.1. INTRODUCTION

On December 7, 2018, the Bureau of Ocean Energy Management (BOEM) published a Notice of Availability for the Draft Environmental Impact Statement (DEIS), consistent with the regulations implementing the National Environmental Policy Act (NEPA; 42 United States Code [USC] § 4321 et seq.) to assess the potential impacts of the Proposed Action and alternatives (Notice of Availability of a Draft Environmental Impact Statement for the Vineyard Wind LLC’s Proposed Wind Energy Facility, 83 Fed. Reg. 63184 [December 8, 2018]). The DEIS was made available in electronic form for public viewing at <https://www.boem.gov/Vineyard-Wind/>, and hard copies and/or CDs were delivered to libraries and other entities as specified in Appendix E of the DEIS. The NEPA review process requires agencies to allow the public the opportunity to comment on a DEIS. The Notice of Availability initiated a 45-day public comment period for the DEIS. Initially, the public comment period was scheduled to close on January 22, 2019; however, due to the 2018-19 federal government shutdown, BOEM extended the comment period until February 22, 2019.

On June 12, 2020, BOEM published a Notice of Availability for the Supplement to the DEIS (SEIS) consistent with the regulations implementing NEPA (42 USC § 4321 et seq.) to analyze reasonably foreseeable effects from an expanded reasonably foreseeable activities scenario for offshore wind development, previously unavailable fishing data, a new transit lane alternative, and changes to the Construction and Operations Plan (COP) since publication of the DEIS (Notice of Availability of a Supplement to the DEIS for Vineyard Wind LLC’s Proposed Wind Energy Facility Offshore Massachusetts and Public Meetings, 85 Fed. Reg. 35952 [June 12, 2020]). The SEIS was made available in electronic form for public viewing at <https://www.boem.gov/Vineyard-Wind/>, and hard copies and/or CDs were delivered to libraries and other entities as specified in the SEIS Appendix F. The Notice of Availability commenced another 45-day public review and comment period of the SEIS.

This appendix describes the DEIS and SEIS public comment processing methodology and definitions, and also includes responses to the substantive comments received on the DEIS and SEIS, and/or describes where specific updates to the Final Environmental Impact Assessment (FEIS) can be found in the document.

K.2. OBJECTIVE

BOEM reviewed and considered all written and oral public submissions received during the DEIS and SEIS public review and comment periods. BOEM’s goal was to identify substantive comments to be addressed in this FEIS, and to categorize those comments based on the applicable resource areas or NEPA topics. This categorization scheme allowed subject matter experts to review comments directly related to their areas of expertise, and allowed BOEM to generate statistics based on the resource areas or NEPA topics addressed in each of the comments.

All public comment submissions received on the DEIS can be viewed online at <http://www.regulations.gov> by typing “BOEM-2018-0069” in the search field. Public comment submissions on the SEIS can be found at the same site by typing “BOEM-2020-0005”.

K.3. METHODOLOGY

K.3.1. Terminology

The following terminology is used throughout this appendix:

- **Submission:** The entire content submitted by a single person or group at a single time. For example, a 10-page letter from a citizen, an email with a portable document format (PDF) attachment, and a transcript of an oral comment given at a public hearing meeting were each considered to be a submission.
- **Form letter:** Pre-written text provided by an interest group for submission by individuals.
 - **Nonvariant** form letter submission: A submission that exactly or nearly exactly matches the pre-written form letter template or text prepared by the interest group.

- **Variation** form letter submission: A submission that is based on, but does not match the pre-written form letter template or text prepared by the interest group.
- **Unique** submission: A submission that is not based on any identified form letter text.
- **Comment:** A specific statement within a submission that expresses a sender’s specific point of view, concern, question, or suggestion. A comment can consist of more than once sentence, as long as those grouped sentences express a single idea. One submission may contain many comments.
- **Substantive Comment:** DEIS submissions were reviewed to identify and categorize “substantive” comments. To be substantive, a comment must meet both of the following criteria:
 - Related to the proposed Project: To be substantive, a comment must first relate to reasonably foreseeable impacts of the Proposed Action, connected actions, or similar planned actions.
 - Consisting of more than simple opinion: This criterion requires that substantive comments provide information to help BOEM prepare the FEIS by providing some level of support or basis for the commenter’s position, or some indication of issues the commenter believes are significant. As a hypothetical example, a statement that “BOEM should reject the Project” would not be considered substantive, but a statement that “The Vineyard Wind Project should not be approved because it would harm commercial fisheries” would be considered substantive.

Substantive comments include those that suggest the DEIS analysis is flawed in a specific way, or suggest alternate information than what is presented in the DEIS. These comments challenge or question the accuracy of information presented, the adequacy, methodology or assumptions of the analysis presented in the DEIS (with supporting rationale), present new information relevant to the analysis, present reasonable alternatives (including mitigation) other than those analyzed in the document, or corrects factual errors in the content of the DEIS. Substantive comments could also provide information in support of the analysis presented in the DEIS.

K.3.2. Comment Submittal

Federal agencies, state/local/tribal governments, and the general public had the opportunity to provide comments on the DEIS and SEIS via the following mechanisms:

- Electronic submissions via www.Regulations.gov on docket numbers BOEM-2018-0069 and BOEM-2020-0005;
- Electronic submissions via email to a BOEM representative;
- Hard-copy comment letters submitted to BOEM via traditional mail;
- Hard-copy comment cards and/or letters received during each of the public hearings; and
- Comments submitted verbally at each of the public hearings.

BOEM held five public hearings in the vicinity of the proposed Project area during the DEIS public comment period, and five virtual public meetings during the SEIS comment period to solicit feedback and identify issues for consideration in updating the FEIS. The hearings were free and open to the public with no reservations required. Locations and dates of these meetings are outlined in Table K-1.

Table K-1: Public Hearings and Virtual Public Meetings

Date	Time	Location
February 11, 2019	Open House 5:00 p.m. to 7:30 p.m. Presentation and Comments 5:30 p.m.	Nantucket Atheneum 1 India Street Nantucket, MA 02554
February 12, 2019	Open House 5:00 p.m. to 8:00 p.m. Presentation and Comments 6:00 p.m.	Martha’s Vineyard Hebrew Center 130 Center Street Vineyard Haven, MA 02568
February 13, 2019	Open House 5:00 p.m. to 8:00 p.m. Presentation and Comments 6:00 p.m.	Double Tree Hotel, Cape Cod Room 287 Iyannough Road Hyannis, MA 02601

Date	Time	Location
February 14, 2019	Open House 5:00 p.m. to 8:00 p.m. Presentation and Comments 6:00 p.m.	Fairfield Inn and Suites Waypoint Event Center 185 MacArthur Drive New Bedford, MA 02740
February 15, 2019	Open House 5:00 p.m. to 8:00 p.m. Presentation and Comments 6:00 p.m.	Narragansett Community Center 53 Mumford Road Narragansett, RI 02882
June 26, 2020	Presentation at 5:00 p.m. followed by testimony and questions and answers	Virtual
June 30, 2020	Presentation at 1:00 p.m. followed by testimony and questions and answers	Virtual
July 2, 2020	Presentation at 5:00 p.m. followed by testimony and questions and answers	Virtual
July 7, 2020	Presentation at 1:00 p.m. followed by testimony and questions and answers	Virtual
July 9, 2020	Presentation at 5:00 p.m. followed by testimony and questions and answers	Virtual

All submissions initially provided by methods other than www.Regulations.gov, including text from the transcripts recorded at each public meeting listed in Table K-1, were uploaded to the docket. Each submission, including testimony by individual speakers at the public meetings listed in Table K-1, was assigned a unique identification number by www.Regulations.gov. That unique Submission ID was retained throughout the comment management process, for both submissions and the individual comments within those submissions.

K.3.3. Comment Processing

K.3.3.1. Compilation of Submissions

BOEM downloaded and reviewed all submissions from Regulations.gov. These submissions were provided in Hypertext Markup Language (html) format, while attachments provided by stakeholders as part of their Regulations.gov submission were typically provided in PDF or Microsoft Word format. Text from the html, as well as smaller PDF, Word, and other text formats were copied from the original format into a single Microsoft Excel file that served as the primary submission database. In cases where a non-html attachment was too large to be copied into Excel, or where text from the file was not machine-readable, the attachment was retained separately, linked to the main body of the submission through the unique Submission ID. The submission database also included information about each submission, including the submitter's contact information, submission date, whether the submitter was a government entity or agency, and the overall disposition of the sender toward the proposed Project.

K.3.3.2. Identification of Substantive Comments

Each submission and all oral testimony were read to identify substantive comments (as defined in Section K.3.1). Each substantive comment was entered into a spreadsheet that served as the master substantive comment database. Each substantive comment then received a unique comment ID number, tied to the Submission ID. For example, the fourth substantive comment identified in Regulations.gov submission 87 was identified as Comment 087-04. Each substantive comment was extracted from the submission text and assigned to one or more section of the DEIS, based on the document's table of contents.

The extracted substantive comments consisted of exact quotes taken from the individual submissions. Each initial substantive comment identification was reviewed by multiple readers, to ensure that comments were substantive, included the appropriate text from the submission, and were assigned to the correct DEIS section to facilitate Subject Matter Expert review and FEIS updates.

K.4. DEIS SUBMISSION AND SUBSTANTIVE COMMENT SUMMARY

K.4.1. Submissions

BOEM received 348 submissions from the public, agencies, and other interested groups and stakeholders, of which 7 were determined to be exact duplicates (same sender, same date, and same content) of other submissions, for a net of 341 unique submissions. Table K-2 shows the types of submissions received during the DEIS public comment period:

Table K-2: DEIS Submissions by Sender Type

Sender Type	Number
Federal agency	5
State agency or representative	9
Local government or representative	9
Nongovernmental organization	40
Business representative or organization	55
General public	223
Total	341

The totals above included the following submissions by federal, state, and local government entities:

- Federal agencies: National Marine Fisheries Service, U.S. Coast Guard, U.S. Environmental Protection Agency
- Massachusetts state agencies or representatives: Executive Office of Energy and Environmental Affairs, General Court, Office of Coastal Zone Management, Representative Bill Straus
- Rhode Island state agencies or representatives: Office of the Attorney General, Coastal Resources Management Council, Department of Environmental Management,
- Other state agencies or representatives: New York State Department of State
- Local government: City of New Bedford, Martha’s Vineyard Commission, Town of Aquinnah, Town of Nantucket, Town of Tisbury, Town of Yarmouth, Madaket Residents Association

In addition to the federal, state, and local government entities identified above, 52 non-governmental organizations provided comment submissions and the general public submitted the remainder.

Submissions were reviewed to determine the overall disposition of the provider toward the proposed Project. Based on this review, dispositions of the 341 unique submissions were as follows:

- Pro (generally in favor of the proposed Project): 185 (54 percent);
- Con (generally opposed to the proposed Project): 37 (11 percent); and
- Neutral (no distinct disposition, or disposition could not be clearly determined): 119 (35 percent).

While repeated language was identified in a small number of submissions, no evidence suggested that any submissions were “form letters,” or pre-written text provided by an interest group for submission by individuals.

K.4.2. DEIS Substantive Comments

BOEM identified a total of 1,789 substantive comments. Table K-3 shows the distribution of comments by DEIS section number (note that because most comments were associated with multiple resources, the number in the Instances¹ column does not add to 1,789. The most common DEIS section or topic commented on included Commercial Fisheries and For-Hire Recreational Fishing, Mitigation, Finfish, Invertebrates, and Essential Fish Habitat, and Purpose and Need.

¹ The instances means the number of times the subject area or section was listed as either the 1st, 2nd, or 3rd subject for the comment. In some cases, the same comment was categorized to more than one subject area of section.

Table K-3: Distribution of Substantive Comments by DEIS Section

DEIS Section ^a	Instances	Percent
Affected Environment-General (3)	4	0.1
Air Quality (3.2.1)	42	1.5
Alternative B (2.1.2)	23	0.8
Alternative D1 (2.1.4)	21	0.8
Alternative D2 (2.1.4)	26	1.0
Alternative E (2.1.5)	10	0.4
Alternative F (No Action) (2.1.6)	12	0.4
Alternatives Not Considered but not Analyzed in Detail (2.1.7)	15	0.6
Alternatives-General (2)	58	2.1
Bats (3.3.3)	8	0.3
Benthic Resources (3.3.5)	92	3.4
Biological Resources-General (3.3)	87	3.2
Birds (3.3.2)	69	2.5
Coastal Habitat (3.3.4)	33	1.2
Commercial Fisheries and For Hire Recreational Fishing (3.4.5)	438	16.1
Consultation and Coordination (4)	105	3.9
Cultural, Historical, and Archaeological Resources (3.4.3)	19	0.7
Cumulative Impacts (Appendix C)	139	5.1
Demographics, Employment, Economics (3.4.1/Appendix F)	123	4.5
Environmental Justice (3.4.2/Appendix F)	9	0.3
Finfish, Invertebrates, and Essential Fish Habitat (3.3.6)	179	6.6
Impact Definitions (3.1)	7	0.3
Impacts-General (3)	91	3.4
Introduction-General (1)	8	0.3
Irreversible and Irrecoverable Commitment of Resources (6)	3	0.1
Land Use and Coastal Infrastructure (3.4.6)	10	0.4
Marine Mammals (3.3.7)	102	3.8
Mitigation (2.2/Appendix D)	234	8.6
Navigation and Vessel Traffic (3.4.7)	110	4.1
Non-Routine Activities (2.3)	19	0.7
Other Comments	12	0.4
Other Uses (Marine Minerals, Military, Aviation, Offshore Energy, etc.) (3.4.8)	15	0.6
Physical Resources-General (3.2)	8	0.3
Proposed Action/Project Description (2.1.1)	141	5.2
Purpose and Need (1.2)	209	7.7
Recreation, Tourism, and Visual (3.4.4)	69	2.5
References	51	1.9
Regulatory Framework (1.3)	36	1.3
Sea Turtles (3.3.8)	20	0.7
Relationship between the Short-Term Use of Man's Environment and the Maintenance and Enhancement of Long-Term Productivity (7)	7	0.3
Socioeconomic/Cultural Resources-General (3.4)	21	0.8
Terrestrial and Coastal Fauna (3.3.1)	3	0.1
Unavoidable Adverse Impacts of the Proposed Action (5)	2	0.1
Water Quality (3.2.2)	25	0.9

^a Section numbering is from the DEIS.

Table K-4 lists the name and agency or organization affiliation (if any) for each person who provided a submission during the DEIS comment period. The submission ID corresponds to the Regulations.gov submission ID, as described in Section K.3.3.2 above.

Table K-4: List of DEIS Comments by ID Number

Submission ID	Name	Government or Non-Governmental Organization Name
0002	Maureen Condon	
0003	Jonathan Ryder	
0004	William Lake	
0005	Jarrett Drake	
0006	Seth Handy	
0007	Deven Robitaille	
0008	Susan Starkey	
0009	Rick Kidder	SouthCoast Chamber
0010	Beth Casoni	Massachusetts Lobstermen’s Association
0011	Ronald Dagostino	
0012	Carl Borchert	
0013	Randi Allfather	
0014	William Lake	
0015	Janet Rochon	
0016	Matt Lord	
0017	Fred Unger	
0018	Robert Mason	
0019	Christopher Lanctot	
0020	Michael Jacobs	
0021	David Dow	
0022	Bill Ravanese	
0023	Fred Murphy	
0024	Paul Pimentel	
0025	Lisa Coedy	
0026	David Charles	
0027	Max Ciarlone	
0028	Peter Bachant	
0029	Elizabeth Rodio	
0030	Eva Jellison	
0031	Jonathan Ryder	
0032	James Boyd	RI Coastal Resources Management Council
0033	Wendy Northcross	Cape Cod Chamber of Commerce
0034	Ann Rosenkranz	350 Martha’s Vineyard Island
0035	Dorothy McIver	Greening Greenfield
0036	Lindsay Crouch	
0038	Thomas Melone	Allco Renewable Energy Limited
0039	Alan & Kristi Strahler	
0040	Gregory Garrison	Northeast Solar Design Associates,
0041	Emlyn Addison	
0042	Rudy Whelan	
0043	Jon Hartzband	
0044	Steven Carvalho	
0045	Will Stark	
0046	Daniel LaVecchia	LaMonica Fine Foods
0047	Julius Lowe	
0048	Carol Lampson	
0049	Jeffrey Kominers	
0050	Nicole Morris-McLaughlin	Marion Institute- Southcoast Energy Challenge
0051	Jerald Katch	

Submission ID	Name	Government or Non-Governmental Organization Name
0052	Mark Wirtanen	
0053	Ben Hellerstein	Environment Massachusetts Research & Policy Center
0054	Caroline Ochs	MASSPIRG
0055	Raysel Martinez	
0056	Elias Lieberman	
0057	Bethia Brehmer	
0058	daniel webb	
0059	Fran Schofield	
0060	M E Sinkiewicz	
0061	Liz Argo	
0062	Alessandro Bocconcelli	
0063	Janet M Hively	
0064	Stephen Tom	
0065	Sheila Place	
0066	Thomas Sullivan	
0067	Robert Stuyt	Brabers
0068	Linda Ziegler	
0069	Brent Loftes	Scandinavian Fisheries, Inc
0070	Reno Mastrocola	
0071	Jason Jarvis	Old Jake Fisheries
0072	Rosemary Carey	
0073	Gordon Starr	
0074	Andrew Grande	Massachusetts Climate Action Network
0075	Annie Hayes	
0076	David Hubbard	ACK Residents Against Turbines
0077	Jan Galkowski	
0078	Audra Parker	Alliance to Protect Nantucket Sound
0079	Moncrieff Cochran	Cape Cod Climate Change Collaborative
0080	Genna Duplisea	
0081	Lisa Engler	Massachusetts Office of Coastal Zone Management
0082	Candace Ruffleth	
0083	Noli Taylor	
0084	Steven Anderson	Rhode Island Party and Charter Boat Association
0085	Matthew Cannon	
0086	Rick Bellavance	RI CRMC Fishermen's Advisory Board
0087	Hugh Dunn	SouthCoast Development Partnership (housed at UMass Dartmouth)
0088	Katie Almeida	The Town Dock
0089	Brendan O'Neill	Vineyard Conservation Soc VCS
0090	Holly Goyert	American Bird Conservancy
0091	Susan Feller	
0092	Anonymous	Executive Office of Energy and Environmental Affairs
0093	Meghan Lapp	Seafreeze Ltd.
0094	Peter Neronha	Rhode Island Office of the Attorney General - Peter F. Neronha
0095	Megan Amsler	
0096	Caroline Karp	Emerita Faculty, Brown University
0097	Rich Lodge	
0098	Gary Harcourt	
0099	Brian Loftes	RI Commercial Fishermens Alliance
0100	Carol Shweder	
0101	Ronald Gagnon	RIDEM
0102	Don DeBerardino II	F/V UMIAK
0103	Janice Kubiak	
0104	Kristin Daley	KD Consulting
0105	Stuart Sheehan	

Submission ID	Name	Government or Non-Governmental Organization Name
0106	Anonymous	
0107	Thomas Nies	New England Fishery Management Council
0108	Patti Rego	Marion Institute
0109	Hunter Moorman	
0110	Paul Cove	
0111	Thomas Soldini	
0112	Julian Cyr	MA General Court
0113	Thomas Dameron	Surfside Food, LLC
0114	Amanda Braga	Marion Institute
0115	Catherine Bowes	Environmental NGOs
0116	Bonnie Brady	Long Island Commercial Fishing Association
0117	Don Keeran	Association to Preserve Cape Cod
0118	Charles Stott	
0119	Rex Jarrell	
0120	Timmons Roberts	
0121	James Spellman	Spellman Energy Associates LLC
0123	Tobias Glidden	
0124	Carol (Mary Caroline) Magenau	
0125	Haskell Werlin	
0126	Nina Wolff Landau	
0128	William Bridwell	
0129	Maureen Condon	
0130	William Smith III	
0131	Alex Papali	Clean Water Action
0132	Michael Cornish	
0133	John Ellersick	Next Rung Technology
0134	Marc Rosenbaum	
0135	Kate Warner	
0136	Julie Taberman	
0137	Eli Schwartz	
0139	Peter Ruffleth	
0140	Edward Barrett	Northeast Fishery Sector X
0141	John Haran	
0142	Anonymous Oceanographer	
0143	Ann Howe	
0144	Anonymous	
0145	Anonymous	
0146	Colin Wyatt Leddy	
0147	Holly Goyert	American Bird Conservancy
0148	John Pappalardo	Cape Cod Commercial Fishermen's Alliance
0149	Anne Hawkins	Responsible Offshore Development Alliance
0150	Kai Salem	Green Energy Consumers Alliance
0151	Sharon Gold	
0152	Mary Chalke	
0153	Stephanie Thompson	
0154	Sheila Place	
0155	Michael Pierdinock	Recreational Fishing Alliance
0156	Brendan O'Neill	Vineyard Conservation Society
0157	Lauri Murphy	
0158	Thomas Sullivan	
0159	Linda Ziegler	
0160	Robert Myers	
0161	Rich Lodge	
0162	Meghan Lapp	Seafreeze Ltd., Town Dock, Sea Fresh USA

Submission ID	Name	Government or Non-Governmental Organization Name
0163	Meghan Lapp	Seafreeze Ltd.
0164	George & Susan Oleyer	
0165	David Dow	
0166	Audrey Ciochetto	
0167	Beth Casoni	Massachusetts Lobstermen's Association
0168	Anonymous	
0169	David Monti	RI Saltwater Anglers Association
0170	Sandra Pimentel	Vineyard Power
0171	Britt Beedenbender	
0172	Dennis Maltais	
0173	Katie Ruppel	
0174	Peter D'Angelo	
0175	Laura Messier	
0176	Wayne Kurker	
0177	Shannon Donovan	
0178	Timothy Timmermann	Environmental Protection Agency
0179	Rich Lodge	F/V Select
0180	Janice Kubiak	
0181	Rich Lodge	F/V Select
0182	Micheal Dunbar	
0183	Ingold	
0184	Jason Jarvis	Old Jake Fisheries
0185	Josiah Dodge	
0186	Edmund Janiunas	
0187	Jay LaFrance	
0188	Warren Adams	
0189	John Haran	
0190	Michelle Cote	
0191	Jo-Ann Taylor	Martha's Vineyard Commission
0192	James Jacquart	
0193	Maureen Phillips	Madaket Residents Association
0194	David Frulla	Fisheries Survival Fund
0195	Dan Pronk	Hannibal Fish/Lobster Co
0196	paul vigeant	
0197	Michael Waine	American Sportfishing Association
0198	Kisha Santiago-Martinez	New York State Department of State
0199	Michael Warner	
0200	Jon Mitchell	City of New Bedford
0201	Paul Eidman	
0202	Burt Hamner	
0203	Patrick Paquette	
0204	Megan Amsler	Falmouth Energy Committee
0205	Katherine Davis	
0206	David Hubbard	Nantucket (ACK) Residents Against Turbines
0207	Rep. William Straus	
0208	Edwin Zeitz	
0209	Meghan Lapp	Seafreeze Ltd.
0210	Edward Barrett	Massachusetts Fishermen's Partnership
0211	Bruce Mandel	
0212	Joel Gates	
0213	Karin Kugel	
0214	Nathan Davis	
0215	Megan Ottens-Sargent	Aquinnah Rep, BOEM Task Force
0216	Brian Chmielecki	

Submission ID	Name	Government or Non-Governmental Organization Name
0217	David Wallace	Wallace & Associates
0218	David Knapik	Town of Yarmouth
0219	Cam Gammill	Bill Fisher Trade
0220	Mary Chalk	
0221	Alden Lenhart	
0222	Zachary Dusseau	
0223	Cynthia M. Erickson	
0224	Cynthia M. Erickson	
0225	Cynthia M. Erickson	
0226	Dan Mallison	
0227	Patricia Hinkey	
0228	Sharon Gold	Citizen's Climate Lobby
0231	David Wallace	Wallace & Associates
0232	Chris Clander	US Coast Guard
0233	Jason Bridges	Town of Nantucket
0234	Michael Pentony	National Marine Fisheries Service
0235	Anonymous	
0236	Peter Anthony	Nordic Fisheries
0237	Manuela Barrett	
0238	Leanne Bell	
0239	Charles Borkoski	Cape Cod Commercial Fisherman's Alliance
0240	Cynthia Erickson	
0241	Christine Gault	
0243	Christine Greeley	
0244	Tamara Grenier	Nantucket Eco Group
0246	Hoffman	
0247	Frank Haggerty	
0248	Michael Pentony	National Marine Fisheries Service
0249	Stephen Perrault	
0250	Britt Beedenbender	
0251	Erica Fuller	Conservation Law Foundation
0252	Edward Barrett	
0253	Chris Adams	Cape Cod Chamber of Commerce
0254	Elizabeth Barminski	Business Network for Offshore Wind
0255	George Maynard	Cape Cod Commercial Fisherman's Alliance
0256	Don Keeran	Association to Preserve Cape Cod
0257	Jim Wolf, Cape Air	Cape Air
0258	Patrick Paquette	
0259	Maggie Downey	Cape Light Compact
0260	Joyce Flynn	Yarmouth Energy Committee
0261	Joseph Huckemeyer	
0262	Mr. Mallinson	
0263	Keith Roberts	Falmouth Fishermen's Association
0264	Nick Schulz	
0265	Susan Starkey	
0266	Vida Morris	
0267	Charles Mayo	North Atlantic Right Whale Program at the Center for Coastal Studies
0268	Chris Powicki	
0269	Stephanie Thompson	
0270	Mr. Minkiewicz	
0271	Sam Hart	Adult Continuing Education Program on Martha's Vineyard
0272	Julius Lowe	
0273	Dan Seidman	
0274	Bill Lake	

Submission ID	Name	Government or Non-Governmental Organization Name
0275	Rob Hannemann	
0276	Mr. Strahler	
0277	Tom Soldini	
0278	Nicola Blake	
0279	Alice Berlow	
0280	Tim Boland	
0281	Mr. Keene	
0282	Ron Dagostino	
0283	Gary Harcourt	
0284	Melinda Loberg	Board of Selectmen in the Town of Tisbury
0285	Erik Peckar	Vineyard Power Cooperative
0286	Hunter Moorman	Massachusetts Chapter of Elders Climate Action
0287	Richard Toole	
0288	Tom Hodgson	
0289	Sue Hruby	
0290	Megan Ottens-Sargent	Aquinnah Selectmen
0291	Greer Thornton	
0292	Roger Schaefer	
0293	Jon Hartzband	
0294	Wesley Brighton	
0296	Dan Pronk	
0297	David Hubbard	ACK Residents Against Turbines
0298	Ed Barrett	
0299	Amber Hewett	National Wildlife Federation
0300	Steve Chinetti	
0301	Alden Lenhart	
0302	Lauren Sinatra	Town of Nantucket
0303	Pete Meerbergen	
0304	Larry Cronin	
0305	Carl Borchert	
0306	Mary Chalke	
0307	Pete Kaizer	
0308	Ara Charder	
0309	Tobias Glidden	
0310	Troy Huiser	
0311	Mr. Cronin	
0312	Dan Masoud	United Brotherhood of Carpenters and Joiners of America
0313	Dean Pesante	
0314	Chris Lee	Sea Fresh
0315	Katie Almeida	Town Dock
0316	Christopher Brown	
0317	Al Eagles	
0318	Peter Wakeman	
0319	Dennis Ingram	
0320	Brian Thibeault	Rhode Island Lobstermen's Association
0321	Fred Mattera	Commercial Fishery Center of Rhode Island
0322	Chris Glander	U.S. Coast Guard
0323	Dave Monti	Rhode Island Saltwater Anglers
0324	James Violet	
0325	Jason McNamee	RI DEM Marine Fisheries Division
0326	Eric Reid	
0327	Nicole Dipaolo	
0328	Kendra Anderson	
0329	Alex Kithes	

Submission ID	Name	Government or Non-Governmental Organization Name
0330	Rudy Whelan	
0331	Ed Zeitz	
0332	Pat Hinckley	
0333	Amber Hewett	National Wildlife Federation
0334	Mr. Morris	
0335	Brian Thibeault	
0336	Cynthia Erickson	
0337	Mr. Parente	
0338	John Buddy Andrade	New Bedford Minority Action Committee
0339	Hunter Major	
0340	Paul Vigeant	
0341	Amber Hewett	National Wildlife Federation
0342	Gus Santos	
0343	Eric Wilkinson	Environmental League of Massachusetts
0344	Michael Davey	United Brotherhood of Carpenters
0345	Christine Greeley	
0346	Edward Barrett	Northeast Fishery Sector X
0347	Nicole Morris-McLaughlin	Southcoast Energy Challenge
0348	Robert Michaud	
0349	Timothy Field	
0350	David Wallace	Surf Clam and Ocean Quahog Fishery
0351	Brian Loftes	

BOEM's resource specialists reviewed all substantive comments identified and responded to each accordingly. The substantive comments received on the DEIS and responded to in the FEIS are provided in Table K-5.

Table K-5: Substantive Comments on the DEIS and Responses

Index Number	Comment Text	Response
0002-001	With the latest environmental news about reaching tipping points in climate change within the next 11 to 12 years, I think we can't move fast enough to lessen our reliance on fossil fuels by adopting wind and solar energy. Global warming, with ocean warming, is going to change and push further north the viable fishing grounds anyway. So, while I can sympathize that the fishermen do not want their fishing grounds impacted, I think the greater good to society of installing a wind farm in this area must be our priority.	Thank you for your comment.
0002-002	It might even help the fishermen in the long run, while I'm sure activity in the area will impact their immediate needs... We are in very dangerous territory destabilizing the weather patterns. Drought, heat waves, and rising ocean waters and monster hurricanes are all a threat with climate change, and have enormous economic impact -- much more than the economic impact to the local fishing industry.	Thank you for your comment.
0003-001	We all know that climate change is here, and it is already causing devastation. The future predictions range from "terrifying" to "catastrophic." The solution for this has got to be a radical change in the way this country does business. This "solution" is not going to be a single solution, but a vast range of smaller solutions. Wind power is one of those smaller solutions. The only way to make wind viable is to put up some turbines, test out how they function, and then use the information to make the next generation better. In other words, this is no time for Nimbyism.... this is a time for IMBYism! That's right.... stick it right IN MY BACKYARD!... Perhaps wind power isn't the perfect solution, but it is part of the solution, and sure beats sticking our heads in the sand!	Thank you for your comment.
0004-001	While any major construction project will have some temporary impact in the construction area, the construction impacts of this project have been carefully identified, and measures have been identified and will be taken to minimize them. And the longer term effects of the project will be overwhelmingly positive.	Thank you for your comment.
0004-002	Wind energy offshore from Massachusetts and other northeastern states will make a significant contribution to weaning the United States from reliance on fossil fuels for electricity generation. This can be one of the key actions to confront the existential threat of climate change.	Thank you for your comment.
0004-003	And the design of the project promises to avoid any significant long-term adverse effect on fishing or bird life.	Thank you for your comment.
0005-001	BOEM should have established a uniform grid like turbine layout across all lease sites at appropriate spacing determined by impacted industries to allow current fishing and navigation operations to coexist with the wind farms. BOEM's lack of guidance has resulted in each wind farm developing a proprietary layout which	Section 3.10 of the FEIS has been revised to provide additional information related to the use of the Project area by vessels and Project layout. Section 2.5 of the FEIS has been included to identify the agency-preferred alternative.

Index Number	Comment Text	Response
	suits their own needs best and has created a random layout of turbines which are not conducive to a coexistence of fishing activities, navigation, and wind energy development.	
0005-002	More time is needed to establish impacts to affected fisheries and the marine environment. This part of the process is being rushed through in order to take advantage of expiring tax incentives of \$1.4 billion, and the Governor's promise of "affordable" electricity cannot be honored without these tax breaks. Politically it will look bad, and that has been the driving force behind this.	Thank you for your comment.
0005-003	I am writing this to make the public aware of what is really happening and to let them know that the fishing industry will absolutely be negatively impacted by these wind farms. With all the marine sanctuaries, closed fishing areas, and whale issues, the wind farms are 1,400 square miles of a shrinking ocean that will be off limits to commercial fishing and have a ripple effect on its neighboring fishing grounds and the shore-side infrastructure dependent upon them.	Section 3.10 of the FEIS has been updated and includes an expanded discussion on commercial fishing and potential effects to commercial fishing within the WDA.
0006-001	Project: 800 MW; enough for 15% of MA homes & 6% of MA total electricity; like taking 325,000 cars off road (avoids 1.6M tons/year of carbon emissions, & 1000 tpy NOx, 860 tpy SO2); area identified as part of RI Ocean Significant Area Management Plan process and awarded lease area through BOEM process.	Thank you for your comment.
0006-002	RPS goals for RI/MA/CT require 5221MW & offshore is essential; 8480MW committed by eastern states; project provides essential base-load generation; off shore wind has highest capacity factor available for renewables; this energy will be available constantly (24/7); the highest rate of production will be in coldest winter months when we need to reduce reliance on dirty/costly peaker plants (2M barrels of oil burned in 15 days in 2018); will save MA customers ~ \$1.4B & provide ~ \$3.7B in economic benefits; 3600 jobs for VW project; will bring industry to this region; reciprocal interests - neighboring states have certification rights on RI projects - VW is the leader.	Thank you for your comment.
0006-003	Fishery Advisory Board (FAB) claims east/west turbine layout better for their industry; raised late in development (not in Ocean SAMP process or when first presented to FAB) but VW trying to accommodate; fishermen had reported fishing on contours NW/SW of area & fishing tracks provided (attached), which gave rise to NW/SW orientation (to ease vessel passage); reorienting turbines requires engineering/permitting relocation which will take too long for access to tax credits, spoil investor confidence & recast economics proposed to MA; still, VW reoriented to extent possible with current siting and removed 20% of turbine area by using larger turbines; proposing mitigation of any remaining damage (projected lost catch volume) through contributions to industry; will use E/W orientation for future development (on remainder of their lease area) and	Section 3.10 of the FEIS has been revised to provide additional information related to the use of the Project area by vessels and Project layout. Section 2.5 of the FEIS has been included to identify the agency-preferred alternative.

Index Number	Comment Text	Response
	proposing consensus ingress/egress corridor through all lease areas ers for easy vessel transit	
0007-002	By pursuing Off Shore Wind and capitalizing on one of our greatest assets, Southeastern Massachusetts will become a front runner in renewable energy while becoming more sustainable. It is imperative this project is further researched and developed.	Thank you for your comment.
0008-001	As a resident of the Town of Yarmouth, I and about 100 others worked during 2018 to encourage our Town to sign a Host Community Agreement with Vineyard Wind because we see the value on the local level as well as the state, federal and global level of building Renewable Energy projects as quickly as possible. This and MUCH more is urgently needed to reduce our dependence on fossil fuels and work towards 100% Renewable Energy by 2030-2050.	Thank you for your comment.
0008-002	Vineyard Winds switch (based on recent studies they conducted) regarding the primary cable route from New Hampshire Ave to Covells Landing is more than acceptable, as there are no longer any concerns about environmental impacts that cant be mitigated. Now, with local permitting right around the corner, I think its important for you to know the support this project has in our local community.	As specified in Section 2.1 of the FEIS, the DEIS and SEIS contemplated two Onshore Export Cable Routes (OECRs), with alternative options within each route; however, since the publication of those documents, Vineyard Wind has stated all necessary state and local permits for the Covell’s Beach landfall location have been acquired. Therefore, the Proposed Action (Alternative A) and action alternatives only contemplate the one landfall location, Covell’s Beach landfall and onshore route. Alternative B therefore is no longer evaluated as an action alternative in this FEIS. In addition, Section 2.5 of the FEIS has been included to identify the agency-preferred alternative.
0008-003	I have continued to have confidence that Vineyard Wind will conduct relevant studies, work across stakeholder groups, and find ways to address any potential environmental issues that surface as this project moves forward. I dont expect there will be NO impacts, but they are minimal as long as theyre mitigated to the extent feasible. And, the entire offshore wind energy business is learning and improving and innovating more quickly than many other industries. I believe Vineyard Wind is one company that will continue to do the right thing for all stakeholders (including human, marine and other life forms).	Thank you for your comment.
0009-001	Nothing is more important to the region and to our economic and energy future than the proposed offshore wind program.	Thank you for your comment.
0009-002	Our region has seen the closure of a major electricity generating station at Brayton Point and the imminent closure of Pilgrim Nuclear Power Station in Plymouth, both of which have contributed mightily to the electricity supply to our region. The cost of energy in our part of the Commonwealth is among the nation’s highest and each year we see our supply eroding. Clean, efficient wind energy is an industry and a source of electricity to help guarantee a future for the South Coast region, and we strongly urge that the wind program be accelerated and implemented at the soonest possible date.	Thank you for your comment.

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0009-003	The Chamber recognizes the challenge of regulating and permitting what for our nation is a relatively new technology, and we also realize the necessity for safeguarding our base maritime industries, even as this new technology is brought to fruition, but we also recognize that one of the primary stumbling blocks in our attraction of new businesses to the region is in the ongoing questions regarding energy supply and cost.	Thank you for your comment.
0009-004	For an area that has sought new and exciting industries to complement our base industries and diversify our economy, nothing has been more exciting than offshore wind. While it is vital that BOEM assess the environmental impacts of offshore wind as put forth in Vineyard Wind’s proposal, we remain confident that they will meet every guideline established and will ensure a renewable energy future for the South Coast and the Commonwealth.	Section 3.4.1.1 of the DEIS noted the tourism-oriented economies of Barnstable, Dukes, and Nantucket counties. Section 3.4.1.3 of the DEIS noted the benefit of employment generated by the proposed action. Therefore, no change to the FEIS is warranted.
0010-001	MLA supports ALTERNATIVE F—NO ACTION ALTERNATIVE where no action would be taken and BOEM would not approve the proposed project would be our first preferred alternative. While this option may be a long shot we proudly stand behind the commercial fishermen who have been commercially fishing these waters for centuries and were not given first right of refusal to lease the bottom.	Section 2.5 of the FEIS has been included to identify the agency-preferred alternative. Section 3.10.1 of the FEIS has been revised to address this comment.
0010-002	While Alternative E would reduce the overall amount of WTGs from 110 to 84 ultimately reducing the projects footprint we believe the layout of and East West with the 1 nautical mile between turbines would greatly reduce potential interactions between WTGs and vessels and animals in the water.	Sections 3.10 and 3.11 of the FEIS have been revised to clarify the number of turbines in Alternative E, as well as the potential impacts of the 1 nautical mile spacing proposed in Alternative D2. Section 2.5 of the FEIS has been included to identify the agency-preferred alternative.
0010-003	We are still extremely troubled about the safety of the fleet and their ability to safely transit to and from their homeports. We strongly ask that more research be done on the impacts of the OSW turbines and the interaction with radar on the vessels. The port of New Bedford is a hub for the commercial fishing industry here in the Northeast and the OSW lease areas are directly southeast from here and is highly travelled by the fleet.	Section 3.11 of the FEIS has been updated to include information from Vineyard Wind’s Supplemental Navigational Risk Assessment (COP Volume III, Appendix III-I, Epsilon 2020a), which addresses the impact of offshore wind turbine generators (WTGs) on radars.
0010-004	The MLA has several concerns about the development of Offshore Wind (OSW) we are however, extremely concerned that initial studies be conducted not only the lobster resource from the larval stage to the legally harvestable size lobsters as well as an entire benthic habitat pre, post and during construction of any wind turbine in Southern New England.	As described in the revised Section 3.3.2 of the FEIS, Vineyard Wind would implement a Fisheries Monitoring Plan and a benthic monitoring plan, which together would monitor the status of lobster and other resources. All pre- and post-construction monitoring is being developed in coordination with the NMFS as part of the ESA Section 7 consultation.
0010-005	A survey on the larval settlement [lobster] in each developed area will help paint a better picture going forward as to what the impacts are to the lobster resource as these projects become more actively built. Also a survey along the cable routes is imperative given the limited research on Electromagnetic Fields (EMF) on the lobster and conch resources. We are at the very beginning of this and we need to	As described in the revised Section 3.3.2 of the FEIS, Vineyard Wind would implement a Fisheries Monitoring Plan and a benthic monitoring plan, which together would monitor the status of lobster and other resources. The revised Section 3.3.2 of the FEIS also discusses potential effects on lobster. All pre- and post-construction monitoring is being developed in coordination with the NMFS as part of the ESA Section 7 consultation.

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	make sure we get it done right as the sheer amount of electric cable out there is unprecedented and we do not know what the out come will be.	
0010-006	The MLA is further concerned about Vineyard Wind Offshore Wind Energy Project Appendix D Draft Environmental Impact Statement Mitigation and Monitoring; Page D-1 construction and dredging would; “Require that all dredging and cable installation activities use the least environmentally harmful method that would be effective in each area.” The timing and method in which the transmission cable to shore will be taking should be coordinated to not interfere with the conch spawning or any other species for that matter. The future of all commercial harvested species depends on the future stocks.	Section 3.3 and Appendix D of the FEIS discusses the effects of cable laying and mitigation measures to minimize impacts on spawning in Nantucket Sound.
0010-007	Furthermore, the governments’ ongoing conservation effort to increase the population of the North Atlantic Right Whale (NARW) is alarming. How can the government allow such a large scale construction project and not fully understand or explore the long-term impacts of OSW is unacceptable, especially seeing that part of Vineyard Winds proposed COP EIS is to “Reduce impacts on marine trust resources through near-term refinement of exclusion zones based on field measurements of noise reduction systems, and long-term refinements of other pile-driving monitoring protocols based on monthly and/or annual monitoring results.” We are guardedly expressing our concerns that the NARWs habitat and food sourcing will not be disrupted or eliminated completely. While the commercial lobster and fixed gear industries are continually constrained because of potential future interactions with these animals, there is not enough known about the impacts of OSW construction, EMF and noise impacts on the NARW?	See discussion in the revised Section 3.4.2 of the FEIS on impacts on whale habitat. Bottom habitat type conversion could affect NARW, although critical habitat would be avoided. Whales could possibly avoid the WDA because of the WTG presence and/or operational noise. However, there is no evidence suggesting any potential impact would rise above existing baseline levels. The National Oceanic and Atmospheric Administration’s (NOAA’s) draft Incidental Harassment Authorization does not permit injury to any marine mammal, or even Level A Harassment to NARW, and the Authorization may be suspended if NOAA determines that the Project is having more than a negligible impact on a species of marine mammal.
0010-008	The entire wind lease area is a high utilized area by the NARW to feed on the abundant calanus resource there and the whales continue to come and feed every year; what will the impact be on the calanus? Currently, we have been told by whale specialists at the New England Aquarium that the NARW birthrates are declining, what will the impact of OSW have on these highly protected mammals? More research is undeniably needed in this area of concern so that the commercial fleet does not further endure any more baseless constraints.	Section 3.4.1 and 3.4.2 of the FEIS have been updated to include a discussion of zooplankton resources in the Project area. At least 10 new calves have been documented during the 2019/2020 calving season. Further discussion of these resources is provided in the Biological Assessment submitted to NMFS, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ .
0010-009	We are also concerned about the cable burial depths as noted in the Vineyard Wind Offshore Wind Energy Project Appendix D Draft Environmental Impact Statement Mitigation and Monitoring on page D-3 Construction and Cable burial would “Require that cables be buried 6.5 feet (2 meters) at a minimum between the WDA and Muskeget Channel to help avoid trawl hangs. Where cable burial is not technically feasible due to bottom geology or topography, or due to the need to cross other infrastructure, concrete mattresses, or rock placement would be permissible to secure and protect cables.” The use of concrete mattresses is a great concern given the dynamic environment and the shifting sands through	Section 2.1.1 of the FEIS has been updated to address cable burial for the proposed Project. The OECC would have a target burial depth of 5-8 feet (1.5-2.5 meters). Potential interactions with fishing gear are discussed in the revised Section 3.10.2 of the FEIS.

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	Muskeget Channel. Can these cables be buried deeper than the proposed 6.5' in the sand so that they do not become exposed and to reduce any hang ups with mobile gear?	
0010-010	In addition, we are pleased to see that on page D-3 that “Prior to in-water construction, compensate fishermen with a demonstrated history of fishing in any area that would be excluded from fishing during the in-water construction phase of the Project. Compensation programs would be directly negotiated between the lessee and impacted fishermen or follow a compensation program similar to that described for the gear compensation program. Compensation could include direct payments to fishermen and/or could fund fishery directed projects (e.g., research; infrastructure improvements, seafood promotion, etc.)” Whereas, the MLA represents a multitude of fisheries from Canada to Cape May New Jersey and that we should be utilized to mitigate and help vet claims to ensure that the maximum dollars are going to the effected commercial fishermen and negatively impacted industry related businesses.	Section 3.10 of the FEIS has been updated to include details of mitigation and monitoring measures relative to commercial fisheries, including voluntary financial compensation. Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. Additional mitigation and monitoring measures may arise from consultations and coordination with Federal and State resource agencies. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0010-011	Lastly, we are pleased to be working with Vineyard Wind, the MA Division of Marine Fisheries, UMASS Dartmouth (SMASST) on a long-term collaborative lobster research project pre, during and post construction. As stated on page D-5 Vineyard Wind will “Contribute funds to a longterm regional environmental monitoring program as directed by BOEM. The regional collaborative monitoring program would monitor the long-term health of the offshore continental shelf environment within the Massachusetts Wind Energy Area. Funds toward the regional collaborative monitoring program would not exceed \$500,000 per year for the duration of the project.” We are looking forward to getting our lobster study underway in the early part of 2019 and to continue this throughout the length of the project and there after to see what the impacts are of OSW on the lobster resource.	Thank you for your comment.
0011-001	BOEM has found mostly negligible or minor negative impacts to environment and communities, and the suggested alternative actions to reduce the number of turbines and move the preferred cable landing to Barnstable have already been incorporated into the project plan.	Thank you for your comment.
0011-002	Vineyard Wind has committed \$3 million to a Wind and Whales Fund to advance technologies and programs to ensure offshore wind can coexist with marine mammals. This is consistent with the accessible, transparent, and responsive community partner stance that Vineyard Wind has taken throughout the process -- as evidenced also by the the Community Benefit Agreement executed with Vineyard Power.	Thank you for your comment.
0011-003	I personally am deeply concerned about the existential threat of climate change. This project will be the first utility-scale offshore wind project in the United	Thank you for your comment.

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	States, and it represents an extremely important step in addressing climate change. It can and should lead to an enormous offshore wind benefit for the eastern part of the United States. Every part of the country needs to do what it can - - solar in the southwest, hydro in the northwest, onshore wind in the plains states -- and offshore wind in the east.	
0011-004	Locally, Marthas Vineyard will benefit from the location of the projects Operation & Maintenance facility, which will generate up 50 full-time jobs earning a middle class income. There will be an additional multiplier effect for many small businesses on the Vineyard as well. Many local families have experienced the pain of an adult child not being able to stay on the Vineyard due to the high cost of living and a lack of good, year-round jobs.	Section 3.4.1.1 of the DEIS provided information on the tourism-oriented economy of Dukes County. Section 3.6.2 of the FEIS has been updated to note the benefit of year-round jobs for Duke’s County.
0012-001	The Vineyard Wind Energy Project is rated at roughly 800 megawatts of output. It would displace over 2 million tons of carbon dioxide annually from the atmosphere. It would be like taking 350,000 vehicles off the roads of Massachusetts every year.	Thank you for your comment.
0012-002	I live on Nantucket Island and we are on the front lines of climate change with more powerful storms, rising sea levels and coastal flooding. The Vineyard Wind Energy Project would jumpstart the American offshore wind industry and be an excellent first step in reducing carbon emissions and beginning to mitigate the effects of climate change. I support this viable clean renewable energy project and I urge the federal government to see it to construction and completion.	Thank you for your comment.
0013-001	The Vineyard Wind Energy Project is good for Massachusetts and good for the USA. It will create jobs during the construction phase and maintenance and operations jobs. The port of New Bedford and the Marine Commerce Terminal will benefit from the development of the project. The port of Vineyard Haven will benefit. A new supply chain will be created that will bring more jobs as more local and regional workers manufacture and transport wind turbine components for deployment offshore.	Section 3.4.1.3 of the DEIS included information on jobs and the MCT, and had a conclusion of minor beneficial economic impact and reference to the proposed “offshore wind accelerator fund.” Therefore, no change to the FEIS is warranted.
0013-002	Vineyard Wind will displace over 2 million tons of carbon dioxide from the atmosphere annually. That is like taking 350,000 vehicles off the roads of Massachusetts every year. This is a viable clean renewable energy project that can help begin to mitigate the negative effects of climate change like more powerful storms, rising sea levels and coastal flooding.	Thank you for your comment.
0013-003	If the Massachusetts Resource Area is fully developed with wind turbine generators, there would be enough power for all of the homes and businesses of the entire state. I urge BOEM to do all in it’s power to see the Vineyard Wind Energy Project through construction and completion.	Thank you for your comment.
0014-001	I urge BOEM to approve the DEIS and the permit for the Vineyard Wind project. The DEIS extensively reviews the potential environmental impacts of the project	Thank you for your comment.

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	and correctly concludes that any negative impacts will be only minor or negligible. By contrast, the positive impact of harnessing renewable wind energy to reduce reliance on natural gas and other fossil fuels will be tremendous.	
0014-002	If some commenters complain of what they fear may be potential harm to fishing or other ocean activities, their complaints should be evaluated against the now-certainty that climate change will have far more devastating effects on those same activities. Rising sea levels and ocean temperatures will do far more to harm fishing, for example, than the proposed wind turbines could possibly do.	Thank you for your comment.
014-003	The applicant has demonstrated its commitment to identifying and minimizing any negative effects of the project, and it has already taken significant steps in that regard -- notably by reducing the number of turbines and changing the landing site to Barnstable.	Thank you for your comment.
0014-004	This project will be the first step in harnessing the great wind resource of the New England coast to improve the mix of energy sources. Different parts of the country will have different opportunities to move to renewable energy -- some may have hydroelectric resources, and others may rely on nuclear plants. The best chance for New England to address climate change -- the greatest existential threat to humanity -- is to exploit its offshore wind resource. That resource should be exploited responsibly, but it should be exploited as rapidly as possible, as the harmful effects of climate change are occurring much faster than previously anticipated. The DEIS demonstrates that Vineyard Wind has been planned carefully and responsibly, and the public interest will be served by approving it as quickly as possible.	Thank you for your comment.
0015-001	Offshore wind is a new industry in the US, but it has the potential to generate lots of electricity, create new jobs, and address global warming. I fully support efforts that ensure the US takes full advantage of offshore wind through responsibly-sited and developed projects.	Thank you for your comment.
0015-002	The draft Environmental Impact Statement for Vineyard Wind's project demonstrates that the project will have limited negative environmental impacts, while generating thousands of megawatt hours of clean electricity for many years. I therefore believe it would be entirely appropriate for the federal government to allow this project to move forward.	Thank you for your comment.
0015-003	Ensuring that today's children inherit a clean and healthy planet is important to me. I became a grandmother almost three years ago and want my grandson to grow up and live in a world where he doesn't have to worry about climate change, clean air, clean water, and other basic considerations. Supporting offshore wind projects like this one, is a small way in which I can contribute to making his future better.	Thank you for your comment.

Index Number	Comment Text	Response
0016-001	I have spent many relaxing summers on Martha’s Vineyard, and I am strongly in support of this project that will bring important job and industry oppportunitiesopportunities to the local economy, as well as a source of clean, renewable energy that does not rely on energy resources beyond the local environment.	Thank you for your comment.
0017-001	The Vineyard Wind project represents a major milestone in the transition to a non-polluting clean energy future and to our efforts as a society to effectively address the challenges of climate change. As the first commercial scale offshore wind project in the United States, regulatory delays or complications to the project would represent a significant setback to the entire offshore wind industry and to responsible solutions to address climate change generally.	Thank you for your comment.
0017-002	I expect that Vineyard Wind has addressed any and all legitimate concerns that have been raised by the fishing industry. At the public hearing on the project at URI that I attended, some people from the fishing industry were raising spurious concerns about the environmental risks from the project and about exaggerated impacts on their industry. Wind generator foundations have been shown to provide protected habitat for young fish and thus help enhance fisheries. With lots of industry experience in Europe, there is no credible evidence of damage or negative impacts from offshore wind projects on fish populations or ocean ecosystems.	Thank you for your comment.
0017-003	As for any impacts on the current patterns of fishing operations, with the very wide spacing planned between wind generators, any practical and sensible fishermen should be able to easily adapt.	Thank you for your comment.
0017-004	Reactionary fear of change is not a legitimate reason to delay progress. The fishing industry and offshore wind industry are entirely compatible and can easily co-exist. The challenges we face from climate change are serious. We need to help expedite and encourage serious solutions like Vineyard Wind.	Thank you for your comment.
0018-001	I am in support of this wind project that will supply 800MW of carbon free, renewable energy to Massachusetts; enough to power 425,000 homes. This wind farm development site identified after a 5-year stakeholder and community engagement process with the Federal government which included representation from all six towns on Marthas Vineyard and the Marthas Vineyard Commission. The companies managing the project (Avangrid and Copenhagen Infrastructure Partners) have extensive offshore wind experience worldwide and financial capabilities to finance large infrastructure projects. And Vineyard Wind has been an accessible, transparent and responsive community partner throughout the process. This is evident in the Community Benefit Agreement executed with Vineyard Power.	Thank you for your comment.

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0018-002	After extensive research, data collection and stakeholder input, BOEM has found mostly negligible or minor negative impacts to environment and communities and there are many environmental and economic benefits. This is a first step in Massachusetts commitment to 1,600 MW of offshore wind. The Mass Dept of Energy Resources (DOER) determined this wind farm will save Massachusetts ratepayers \$1.4 billion over 20 years. And Marthas Vineyard will benefit from the location of the projects Operation & Maintenance facility.	Section 3.6.2 of the FEIS has been updated to include information on the benefit of year-round jobs for Dukes County.
0018-003	Different kinds of low-carbon resources are appropriate in different parts of the country... In the Northeast, there is no low-carbon resource that comes close to being competitive with offshore wind. For us, solar is great, but with current technology its a relatively small resource. Canadian hydro is great, too, but we dont control the transmission routes, which run through northern New England. Its offshore wind that is the huge and accessible resource for us here in New England and the mid-Atlantic states.	Thank you for your comment.
0019-001	I believe that the USA is behind the eight ball when it comes to offshore wind farms it has the potential to generate lots of electricity, create new jobs, and address global warming. I fully support efforts that ensure the US takes full advantage of offshore wind through responsibly-sited and developed projects.	Thank you for your comment.
0019-002	The draft Environmental Impact Statement for Vineyard Wind’s project demonstrates that the project will have limited negative environmental impacts, while generating thousands of megawatt hours of clean electricity for many years. I therefore believe it would be entirely appropriate for the federal government to allow this project to move forward... This is a small step to start our country’s jump into off shore wind farms to produce cleaner energy for our country.	Thank you for your comment.
0020-001	I congratulate BOEM and Vineyard Wind in bringing forward this project with the finding of negligible or minor negative impacts to environment and communities from a significant and substantial energy facility in the densely populated Northeast coast. This process has been comprehensive and inclusive, and the care taken has produced this positive evaluation.	Thank you for your comment.
0020-002	BOEM and Vineyard Wind benefit from the selection of the wind farm development site after a 5-year stakeholder and community engagement process with the Federal government that included engagement with representatives from all six towns on Marthas Vineyard and the Marthas Vineyard Commission. Vineyard Wind has been an accessible, transparent and responsive community partner throughout the process. This is evident in the Community Benefit Agreement executed with Vineyard Power. The DEIS also reflects the commitment of Vineyard Wind Parent companies (Avangrid and Copenhagen Infrastructure Partners) that have extensive offshore wind experience worldwide.	Thank you for your comment.

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0020-003	I urge BOEM to approve the DEIS and provide all means available to allow the prompt start of construction of this needed and attractive project.	Thank you for your comment.
0021-001	I support construction of the Marthas Vineyard Wind facility in Nantucket Sound in the proposed area and bringing the power ashore in the City of Barnstable, Ma. for connection to the regional electric grid. I used to work at the Fisheries Lab in Woods Hole where I was recreational fisheries coordinator in the Northeast and served on the New England Fishery Management Council’s Habitat Plan Development Team which helped develop Omnibus Habitat Amendment 2 which was approved by NOAA Fisheries in January 2018.	Thank you for your comment.
0021-002	I feel that the towers will be attracting a number of species targeted by saltwater anglers (black sea bass; striped bass; scup; etc.) and not cause negative effects on commercial species like American lobsters and sea scallops.	Thank you for your comment.
0021-003	Accommodations need to be made for North Atlantic right whales during construction when they are feeding in this area.	Section 3.4.2 and Appendix D of the FEIS have been updated to include a discussion of mitigation and monitoring that has been proposed for the agency-preferred alternative relative to the North Atlantic right whale. As discussed in the FEIS and included in Appendix D, additional measures include the non-government organization Agreement which includes elements to minimize effects to the NARW, refinement of exclusion zones for of construction activities, periodic cleanup of fishing gear trapped on WTG foundations and other offshore Project elements. The FEIS clarifies that the proposed Project schedule avoids peak seasons for this species.
0022-001	My comments are in support of Vineyard Winds offshore wind project and its draft Environmental Impact Statement (DEIS). The draft Environmental Impact examination shows that the project will have very limited negative environmental impacts.	Thank you for your comment.
0022-002	As well, the local communities and the Commonwealth will benefit greatly having zero emission energy, while at the same time mitigating air pollution since the wind farm will offset fossil fuel use and its negative health impacts. So, transitioning our state quickly away from fossil fuels and toward renewable wind energy will not only help combat climate change, but it will also have immediate benefits in improving the quality of our air and our health. Zero emission wind can save our businesses, citizens, and the Commonwealth over 6 cents/kWh in health care costs.	Thank you for your comment.
0022-003	The Vineyard Offshore Wind development project will also provide needed fuel diversity, which ISO New England has promoted to maintain a healthy grid for the New England region.	Thank you for your comment.
0022-004	I support this project for these other reasons: create thousands of new skilled jobs, lower our monthly electricity bills for all rate payers, be good for the	Thank you for your comment.

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	environment, and importantly, Vineyard Wind has taken significant steps to be a responsible developer, and limit environmental impacts.	
0022-005	I urge BOEM to approve this project and continue its efforts to support the development of offshore wind projects off the coast of New England.	Thank you for your comment.
0023-001	Supply 800MW of carbon free renewable energy to Mass.,enough to power 425,000 homes, 6% of states's use Location is 14 miles south of Martha's Vineyard which will reduce the negative visual impact. All six towns on Martha's Vineyard have approved the facility. Parent companies of the project have extensive expertise worldwide in construction and management of previous similar projects of this type.	Thank you for your comment.
0023-002	Vineyard Wind of which I am a member has been accessible, transparent and responsive to educating the local population to the positive and negative elements for this project, allowing islanders the ability to become informed citizens	Thank you for your comment.
0023-003	Emission reductions: 1.6 million tons of CO2, reduced NOx emissions	Section A.8.1 in Appendix A of the FEIS has been clarified to include information on emissions and incorporates by reference Vineyard Wind's COP and/or OCS Air permit.
023-004	First step in Massachusetts commitment to 1600 Mega watts of offshore wind	Thank you for your comment.
0023-005	Raising awareness for coexistence between offshore wind and marine mammals.	Thank you for your comment.
0023-006	Mass DOER has determined the state ratepayers will receive \$1.4 billion over 20 Years.	Thank you for your comment.
0023-007	Marthas Vineyard will directly benefit through increased local jobs and training toward those new jobs. Supply chain opportunities for existing island businesses and other state businesses to supply the needs of this field	Section 3.6.2 of the FEIS has been updated to include information on the benefit of year-round jobs for Duke's County.
0024-001	These comments support the approval of the Draft Environmental Impact Report for the Vineyard Wind Construction & Operation Plan. This timely project was sited after a 5 year stakeholder and community engagement process with the Federal government which included broad representation from across Marthas Vineyard. Vineyard Wind has been an accessible, transparent and responsive community partner throughout the process.	Thank you for your comment.
0024-002	The proposed project will supply up to 800MW of carbon free, renewable energy to Massachusetts; thats enough to provide 6% of the Commonwealths overall energy consumption. Its a big part of Massachusetts commitment to 1,600 MW of offshore wind. Its the first utility scale offshore wind project in the US and its a big step in addressing the greatest existential threat to mankind.	Thank you for your comment.
0024-003	It will save ratepayers money, and boost our economy with new jobs all with little significant adverse environmental impact.	Thank you for your comment.
0024-004	Vineyard Wind has committed \$3 million to advancing technologies and programs to ensure offshore wind can coexist with marine mammals.	Thank you for your comment.

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0024-005	[Vineyard Wind] has ... committed \$12 million to ensure the offshore wind industry is anchored in Southeastern Massachusetts and will employ local residents. It has already begun an island workforce education and training program for mid-career changers and students at the MV Regional High School.	Thank you for your comment.
0024-006	The importance of Vineyard Wind as a means to provide carbon-free energy to the Commonwealth cannot be overlooked. With the proposed project, the use of gas in electricity generation and the resultant greenhouse gas emissions will be reduced every day. These are necessary meaningful steps to change our fuel mix to a low-carbon mix that contains a significant amount of renewable energy” as described by the Association to Preserve Cape Cod.	Thank you for your comment.
0025-001	I am writing in strong support of the Vineyard Wind offshore wind project. I’ve had the opportunity to get to know this project and Vineyard Wind as the transmission cable was initially planned to come through my town in Yarmouth. Vineyard Wind is a company that is a huge step above traditional energy companies. They have shown they truly care about our natural environment and are doing all they can to protect it. I trust that through this government process, and because of the integrity that Vineyard Wind has shown throughout this process, this project will have the necessary environmental safeguards to sustainably develop the offshore wind industry. We don’t have time to waste, if we are to avoid the catastrophic effects of climate change.	Thank you for your comment.
0026-001	I am concerned about the effects of climate change and the benefits to our country of being energy independent. This important project is an opportunity to do more than just talk about the problem. Approving and building the Vineyard Wind project will be a very tangible demonstration of our commitment and resolve.	Thank you for your comment.
0026-002	Vineyard Winds 800 MW offshore wind project will reduce CO2 emissions from the ISO New England system by approximately 1,680,000 tons per year. This will be a very important step in meeting our renewable energy and greenhouse gas reduction goals.	Thank you for your comment.
0026-003	The Project has conducted an extensive and sustained outreach effort with the communities on the Cape and the Islands and signed the nations first offshore wind Community Benefit Agreement with Vineyard Power Cooperative. This outreach effort has included local residents, their elected and appointed officials, local tribes, fishing and marine interests, environmental advocacy groups, and other interested parties. Vineyard Wind has listened carefully to the feed back provided in these discussions and pledged to continue an extensive outreach effort as the project moves forward.	Thank you for your comment.

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0026-004	The project has conducted extensive surveys and other studies and has carefully selected submarine and onshore cable routes. All cables will be securely buried using proven installation techniques. Short-term disturbance to residents along the land cable routes will be minimized by proper construction planning, scheduling, and traffic management. Affected streets will be restored and repaved, leaving them in like new condition.	Section A.8.6 in Appendix A of the FEIS has been updated to include additional information on road restoration and traffic management. Please note that updated project construction timing information is included in FEIS Chapter 2.
0026-005	Any temporary local inconvenience should be weighed against the important and large-scale societal benefits of the project. Moreover, the Project is committed to developing Host Community Agreements with the affected Towns.	Thank you for your comment.
0026-006	In collaboration with the University of Massachusetts Dartmouths School for Marine Science and Technology (SMAST), Vineyard Wind has committed to conduct pre- and post- construction assessments of fisheries and associated ecological conditions.	Section 3.3.6.3 of the DEIS, described the proposed Fisheries Monitoring Plan. Appendix D of the FEIS has been revised to discuss fisheries monitoring to be conducted in coordination with SMAST.
0026-007	Vineyard Wind is committed to working with the fishing industry so that both the wind and fishing industries can grow together offshore Massachusetts. One example is that Vineyard Wind, in consultation with local fishermen, established specific vessel transit lanes in the turbine layout design.	Section 3.10.2 of the FEIS has been updated to include additional information on Vineyard Wind’s commitment to work with the fishing industry.
0027-001	I support the construction of an offshore wind-energy farm off the South Coast of MA. There is so much potential, free, clean energy that we need to start harvesting to protect our future. We cannot continue to live off coal and oil. Wind energy has very little impact on the environment and any costs are far outweighed by the benefits of the energy produced.	Thank you for your comment.
0028-001	I support the proposed action. The minor short-term negative effects are well worth both the environmental and economic benefits this wind farm will bring.	Thank you for your comment.
0029-001	I fully support this project and think that any impact assessment should consider the positive environmental impact from climate change mitigation that a wind farm presents.	Thank you for your comment.
0030-001	I fully support off shore wind in/near Massachusetts. We as a country need to make the transition to renewable energy production or we will need to change more of our way of life that just missing a pretty view.	Thank you for your comment.
0030-002	The wildlife affected won’t even be around in the same way if we can stop producing green house gases. We need to keep the water cold for our fishing industry so the species we rely on still thrive here in 100 years. There is too much at risk not to take full advantage of our renewable resources.	Thank you for your comment.
0031-001	I completely and utterly support Vineyard Wind’s proposal. As the past year has made clear, climate change is real and it is accelerating. Unless we do something NOW, we are looking at the very real possibly of human extinction. There is no big SOLUTION to this problem; instead, there are numerous smaller “solutions”	Thank you for your comment.

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	that taken together add up to the SOLUTION. Wind Energy is one of those biggest of those smaller “solutions.”	
0031-002	People may think that turbines are “ugly”; in response, I’ll take a little disruption of a sea view in order to ensure planetary survival.	Section 3.4.4.3 of the DEIS addressed the subjective nature of visual impacts, while Section 1.2 addressed the purpose and need for the Proposed Action; therefore, no additional analysis was required in the FEIS.
0031-003	People may say that the technology is not perfected; well, unless turbines are put up, the technology won’t be perfected.	Thank you for your comment.
0032-001	The description of Alternative D in the DEIS is incomplete and not accurate. The CRMC has proposed and continues to advocate for a grid layout of the Vineyard Wind project (and all other proposed wind farms in southern New England waters) with an east-west orientation with 1 nautical mile (nm) spacing between turbines and that each row between turbines is 1nm wide. This east-west alignment with 1 nm spacing alternative is a compromise on behalf of the Rhode Island-based commercial fishing industry, but it will allow the fixed and mobile gear commercial fishing operations to continue to operate (with modifications to gear and methods) within the Vineyard Wind lease area in a manner that the commercial fishing industry can coexist with the offshore wind energy industry.	Alternative D2, as described in the DEIS, includes a turbine layout with an east-west orientation and 1 nautical mile spacing between all turbines, creating rows between the turbines that are 1 nautical mile wide. Alternatives D1 and D2 have been fully evaluated in the DEIS and, subsequently, the FEIS. However, in order to eliminate any confusion, Section 2.1.3.2 of the FEIS was updated to clarify that 1 nautical mile of spacing would occur between all turbines. Section 2.5 of the FEIS has been included to identify the agency-preferred alternative. Section 3.10 of the FEIS has been revised to include additional information on maneuverability and use of the WDA by commercial fisherman and the section has been clarified on the distances required for mobile gear fisherman.
0032-002	It is incorrect to state that Alternatives D1 or D2 would increase the WDA area by approximately 22%. Vineyard Wind has committed to using a larger 9.5MW turbine and needs only 84 turbines to meet their need and purpose for the project...since Vineyard Wind has committed to using the larger 9.5MW turbine model, then there will be no expansion necessary of the proposed project area (WDA) under either Alternative D1 or D2.	The development of the EIS has been based on Vineyard Wind’s utilization of the Project Design Envelope (PDE), which included a range of 8–10 MW WTGs as assessed in the DEIS and was updated to allow for up to 14 MW WTGs. The FEIS assesses the impacts of the reasonable range of Project designs that are described in the Vineyard Wind COP and presented in Appendix G by using the “maximum-case scenario” process. Therefore, for Alternatives D1 and D2, it was assumed based on the maximum-case scenario, that there would be 100 turbines resulting in an increase in size of approximately 22 percent for the WDA.
0032-003	...given Vineyard Wind’s commitment to using the larger 9.5MW turbine model, BOEM should undertake an analysis of all the Alternatives within the DEIS using only the 84 large turbines required to meet the purpose and need of the project (i.e. to generate 800MW).	The development of the EIS has been based on Vineyard Wind’s utilization of the PDE, which included a range of 8–10 MW WTGs as assessed in the DEIS and was updated to allow for up to 14 MW WTGs. The FEIS assesses the impacts of the reasonable range of Project designs that are described in the Vineyard Wind COP and presented in Appendix G by using the “maximum-case scenario” process. Therefore, utilization of the 9.5-MW machine falls within the PDE, and impacts have been accounted for. As described in Section 2.1 of the DEIS, BOEM could “mix and match” multiple alternatives which allows the decision maker to select Alternative E in combination with other alternatives. In fact, this was done for the agency-preferred alternative (Section 2.5 of the FEIS).
0032-004	1 nm spacing between turbines such that all east-west lanes between rows of turbines also have 1 nm spacing...as a requirement for all wind farms in southern New England waters will ensure consistency of turbine placement and reduce	Section 2.1.3 of the FEIS describes Alternatives D1 and D2, which would both include 1 nautical mile spacing. Resource-specific sections in Chapter 3 and Appendix A describe the impacts of the 1 nautical mile spacing. Section 3.11.2 specifically addresses the ability of vessels to navigate within the Proposed

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	navigational and safety risks as compared to a random installation of turbines within wind farms.	Action’s WTG array, based on the Project’s Supplemental Navigation Risk Assessment (COP Volume III, Appendix III-I, Epsilon 2020a). As specified in the SEIS and Chapter 2 of the FEIS, independent of the Proposed Action, and after publication of the DEIS, Vineyard Wind and other Rhode Island and Massachusetts offshore wind leaseholders have committed to implementing a 1 x 1 nautical mile WTG grid layout in east-west orientation (equivalent to Alternative D2) in response to stakeholder feedback. The RI and MA Lease Area developers’ agreement was reached in order to avoid irregular transit corridors.
0032-005	This east-west alignment with 1 nm spacing alternative is a compromise on behalf of the Rhode Island-based commercial fishing industry, but it will allow the fixed and mobile gear commercial fishing operations to continue to operate within the Vineyard Wind lease area (with modifications to gear and operations) in a manner that the commercial fishing industry can coexist with the offshore wind energy industry.	Section 2.1.3 of the FEIS describes Alternatives D1 and D2, which would both include 1 nautical mile spacing. Resource-specific sections in Chapter 3 and Appendix A describe the impacts of the 1 nautical mile spacing. Section 3.11.2 specifically addresses the ability of vessels to navigate within the Proposed Action’s WTG array, based on the Project’s Supplemental Navigation Risk Assessment (COP Volume III, Appendix III-I, Epsilon 2020a). As specified in the SEIS and Chapter 2 of the FEIS, independent of the Proposed Action, and after publication of the DEIS, Vineyard Wind and other Rhode Island and Massachusetts offshore wind leaseholders have committed to implementing a 1 x 1 nautical mile WTG grid layout in east-west orientation (equivalent to Alternative D2) in response to stakeholder feedback. The RI and MA Lease Area developers’ agreement was reached in order to avoid irregular transit corridors.
0032-006	Fisheries values for the Vineyard Wind lease area and WDA should be updated with more recently published sources. The BOEM analysis relies upon the Kirkpatrick (2017) assessment that is based only on vessel trip reports (VTR), which are known to grossly underrepresent catch landings associated with specific areas because of the nature of the reporting. The RI Department of Environmental Management Division of Marine Fisheries (RIDEM DMF) completed an updated assessment of landings for the wind energy areas...: http://www.dem.ri.gov/programs/bnatres/fishwild/pdf/RIDEM_VMS_Report_2017.pdf . ..Additionally, RIDEM DMF recently completed an analysis specifically for the Vineyard Wind WDA that is available here: http://www.dem.ri.gov/programs/bnatres/fishwild/pdf/FishValue_VWCOP.pdf .	The analysis of fishery value has been updated in Section 3.10.1 of the FEIS to include information from the RI DEM study and the RI DEM 2017 addendum report, which included information for fishing revenue by port. Additionally, NOAA provided specific fishing revenue and landed pounds by species, port, gear type, and state for 2008 to 2017, which was incorporated in Section 3.10.1 of the FEIS. The Rhode Island 30-year fishing value report was also incorporated in Section 3.10.1 of the FEIS, Wind Development Area subheading. The FEIS also acknowledges that vessel monitoring system (VMS) and vessel trip report (VTR) data collection methods have different benefits and limitations.
0032-007	It is not clear how BOEM provides data for 2017 in Tables 3.4.5-7a and 7b regarding fisheries value when citing a personal communication dated 2016. We note that this data source does not appear to be peer reviewed or publicly available for inspection. Thus, BOEM should clarify this data source and make the data available. Moreover, it is our understanding that the NMFS fish landings data that BOEM cites (G. DePiper, Pers. Comm., August 2016) in Tables 3.4.5-7a and 7b should be limited to planning level applications and not an authoritative assessment. BOEM should justify this data source and use within the DEIS.	The reference to G. DePiper has been corrected in the FEIS. The referenced G. DePiper data are available publicly at https://www.boem.gov/Renewable-Energy-GIS-Data/ (see section on Socio-Economic Impact of Outer Continental Shelf Wind Energy Development on Fishing in the U.S. Atlantic). Additionally, NOAA provided specific fishing revenue and landed pounds data by species, port, gear type, and state for 2008 to 2017, which was incorporated in the revised Section 3.10.1. Section 3.10.1 of the FEIS has been further revised to also include data from the addendum to “Spatiotemporal and economic Analysis of Vessel Monitoring System Data within Wind Energy Areas in the Greater North

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		Atlantic” prepared by the RI DEM, as well as results from the “Rhode Island Fishing Value in the Vineyard Wind Construction and Operations Plans Area” also prepared by the RI DEM. Data from multiple sources was used to describe the existing environment and guide the assessment process.
0032-008	The values shown in Table 3.4.5-7a and especially Table 3.4.5-7b are misleading and do not properly characterize the value of landings for the various fisheries management plan (FMPs) units and importance to individual states. For example, Table 3.4.5-7b shows that the Mackerel, Squid, Butterfish FMP landings as a percentage of coast-wide landings for the years 2007-2017 range from a low of 0.02% (2007) to a high of 1.62% (2016). We note that during the period of 2011-2016 fifty-two percent (87,430,234 pounds) of the entire U.S. Atlantic commercial longfin squid harvest were landed and processed in Rhode Island ports. The value of Rhode Island-based landings for the squid/mackerel/butterfish FMP that are verifiably attributable to BOEM lease blocks OCS-A 500 and OCS-A 501 (Vineyard Wind) during the period of 2011 through 2016 were \$13,549,086. The total value of Rhode Island-based landings for longfin squid from all federal waters during the same period were \$98,558,493. Thus, approximately 14% of all longfin squid landings in Rhode Island ports during the period of 2011 through 2016 from these two lease blocks. Assuming that longfin squid landings were spatiotemporally distributed equally throughout these two lease blocks, and since Vineyard Wind accounts for 47% of the total area, then the Vineyard Wind lease area would represent approximately 7% of all Rhode Island-based landings for longfin squid from all federal waters during the 2011-2016 period, which is significant.	Section 3.10 of the FEIS has been updated to reflect new information and data in support of BOEM’s analysis. Specifically, the SEIS included updated information received from NOAA, other fisheries management bodies, and other sources consulted in the course of responding to comments BOEM received on the DEIS. The SEIS analysis formed the basis of the information and analysis included in the FEIS. See Section 3.10 for updated information as it relates to landings values for various fisheries.
0032-009	It is CRMC’s view that the cumulative impacts analysis does not take into consideration the likely cumulative impacts related to all other offshore wind leases, as the analysis focuses primarily on the Tier 1 and Tier 2 projects...The BOEM DEIS impacts analysis overlooks the potentially devastating cumulative impacts on the commercial fishing industry that will result from the installation and operation of as many as 1375 turbines in southern NDespite the perceived limitations for assessing future project impacts, The CRMC requests BOEM to conduct a more thorough cumulative analysis of all the Alternatives to improve the overall understanding of project impacts. ew England waters upon build out of the BOEM leases. Fishing vessel displacement will occur as a result of the Vineyard Wind and other planned and future offshore wind energy projects and must be accounted for in BOEM’s analysis.	BOEM published an SEIS in June of 2020 to assess an expanded scenario of reasonably foreseeable activities. In addition, Section 3.10 of the FEIS has been updated to reflect new information and data in support of BOEM’s analysis, and in response to comments received on the SEIS.
0032-010	[In Table 6-1] essentially, BOEM is saying that although commercial fishermen may not be able to fish within Vineyard Wind’s WDA for the life of the project (30 years), they will be able to fish within the WDA after the project, and that	Table C.3-1 in Appendix C (formerly Table 6-1) of the FEIS has been updated to state that Vineyard Wind’s activities could result in habitat alteration during construction and operations, or limit access to fishing areas; however, the

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	there will be no irreversible impacts to fishery resources resulting from the project. However, this assumption by BOEM is not supported and fishery resources impacts from particular construction phases of the project are largely unknown and unaccounted for within BOEM’s analysis. BOEM should provide a basis for these assumptions.	decommissioning of the proposed Project would reverse those impacts. The assessment for commercial fisheries is based on the assessment for coastal habitat, benthic resources, and finfish, invertebrates, and essential fish habitat.
0032-011	BOEM acknowledges a benefit with Alternative D that results in an east-west alignment with 1 nm spacing as follows within the DEIS at 3-190...This statement within the BOEM DEIS supports the CRMC’s preferred alternative...Accordingly, Vineyard Wind should modify their project layout in accordance with CRMC’s preferred alternative so that both industries can coexist.	Section 3.10.7 of the FEIS now states that “Alternative D2 is the alternative preferred by Rhode Island Coastal Resources Management Council...”
0032-012	Rhode Island Coastal Resources Council did not comment that Alternative E would be less impactful than the proposed action. Remove the footnote for Alternative E and all other footnotes stating that endorsement.	Section 2.4 of the FEIS has been updated by removing all statements that Rhode Island Coastal Resources Management Council said that Alternative E would be less impactful.
0032-013	Ecological monitoring, fishery impact monitoring and a communications plan are not mitigation measures. Remove from table or clarify the difference between necessary monitoring and mitigation.	Appendix D of the FEIS has been updated as a result of this and other comments to distinguish mitigation and monitoring.
0032-014	Add that human injury and fatality could occur; Adequate spacing of WTGs to avoid allisions has not been proposed except in Alternative D with 1nm spacing.	Section 3.11 of the FEIS has been updated to account for the potential risk for collisions. In addition, the FEIS has been updated on consequences (e.g., injuries, oil spills, damage to boats/WTGs) in Section 3.11.
0032-015	State that WTGs may be a hazard to navigation in severe weather.	Section 3.11 of the FEIS has been updated to account for the potential risk for collisions. In addition, the FEIS has been updated on consequences (e.g., injuries, oil spills, damage to boats/WTGs) in Section 3.11.
0032-016	More discussion needed on effects of construction, particularly monopile installation and hammer acoustic energy impacts on squid and squid egg mops.	Section 3.3.6.3 of the DEIS already discussed the potential effect of pile driving noise on squid egg mops and other eggs. Sections 3.3.2 and 3.3.6 of the FEIS have been updated to include additional information on acoustic impacts on fish resulting from pile driving activities, including a discussion of proposed hammer energies to be used during pile driving. Acoustic monitoring would be used to ensure that the minimum level of sound attenuation is achieved. Pile driving noise can cause temporary behavioral changes in squid, but no empirical studies in an open ocean environment have been done. Please refer to the EFH Assessment for a discussion of construction-related impacts on squid and squid egg mops. The EFH Assessment can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ .
0032-017	This section needs to include all proposed wind energy development projects within RI and MA WEAs as part of cumulative impact analysis, especially in light of successful lease sales within the MA WEA concluded in December 2018.	Chapter 1 and Appendix A of the FEIS has been updated to include additional projects considered for planned action analysis. BOEM published an SEIS in June of 2020 to assess an expanded scenario of reasonably foreseeable activities. Section 3.3 of the FEIS has been revised to include additional effects on fish,

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		invertebrates, and essential fish habitat based on the projects within the geographic analysis area.
0032-018	The economic values shown are inadequate and the data use is not consistently the same time period. More relevant and contemporaneous data is available from RIDEM DMF.	Section 3.10 of the FEIS has been updated to reflect new information and data in support of BOEM’s analysis. Specifically, the SEIS included updated information received from NOAA, other fisheries management bodies, and other sources consulted in the course of responding to comments BOEM received on the DEIS. The SEIS analysis formed the basis of the information and analysis included in the FEIS. See Section 3.10 for updated information as it relates to landings values for various fisheries.
0032-019	Displacement discussion includes compensation for displaced fishermen, but needs to include discussion of fishermen that would be affected by displaced fishermen moving into areas already fished by others.	Section 3.10.2 of the FEIS has been revised to include a discussion of displacement and potential conflict over fishing grounds and voluntary compensation. Section 3.10 of the FEIS has been updated to include details of mitigation and monitoring measures relative to commercial fisheries, including voluntary financial compensation. Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0032-020	If BOEM imposes a minimum cable burial standard of 2.0 meters as part of COP approval, then the standard should also apply to the inter-array cables in addition to the OECC. Do not discount the negative effects of “no more than 10% of the inter-array and export cables may not achieve the proper burial depth,” as this constitutes 32 linear miles of cable protection that could snag mobile gear (trawl nets).	Section 3.10.2 of the FEIS has been revised to indicate that Vineyard Wind considers cable burial a priority, and would use iterative analyses of survey data, advanced burial techniques, and micro-routing to maximize burial and minimize the need for cable protection (Epsilon 2018a). Based on survey data, Vineyard Wind expects that burial of the inter-array cables would be successful without requiring cable protection. Vineyard Wind would survey the cable burial depth after construction and would monitor the depth periodically. The DEIS already considered a potential mitigation measure of requiring a minimum cable burial depth.
0032-021	Compensation for an area that cannot be fished is a major impact. Compensation does not reduce the impact to minor or moderate.	Section 3.10.2 of the FEIS has been revised to further analyze the fisheries revenue exposure from the Proposed Action and the mitigation measures that would, if consummated, reduce impacts from gear loss and reduced revenue by compensating commercial and for-hire recreational fishermen who are unable to fish within the wind facility during construction, operations, or decommissioning. As Section 3.10.2 of the FEIS describes, not all fishing activity is expected to be impacted equally by the Proposed Action.
0032-022	There is no mitigation plan agreed to between Vineyard Wind and the CRMC’s Fishermen’s Advisory Board, thus BOEM cannot determine whether or not the effects of the project would be mitigated at the present time.	Section 3.10 and Appendix D of the FEIS have been revised to include the Vineyard Wind’s voluntary established gear loss and revenue compensation funds for fishing interests based in Rhode Island, Massachusetts, and other states. Please see Section 3.10 and Appendix D of the FEIS for more details on the measures.

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0032-023	Appendix D outlines potential mitigation but does not clearly address sufficient compensation.	Section 3.10 and Appendix D of the FEIS have been revised to include the Vineyard Wind’s voluntary established gear loss and revenue compensation funds for fishing interests based in Rhode Island, Massachusetts, and other states. Please see Section 3.10 and Appendix D of the FEIS for more details on the measures.
0032-024	Using only AIS data and not including available VMS data does not provide an adequate impact analysis evaluation by BOEM. Therefore, the data BOEM used in its analysis are not sufficient to support BOEM’s impact findings of the DEIS.	Section 3.11 of the FEIS has been updated to include additional information about VMS data, as provided in Vineyard Wind’s Supplemental Navigational Risk Assessment.
0032-025	Data [Table 6-1] does not support the assumptions of no impacts; show the data to support the assumptions or change the assumptions.	Irreversible impacts were defined in Chapter 6 of the DEIS (now found in Appendix C of the FEIS) as occurring when the impacts from the use limit the future options of its use, due to use or destruction of a specific resource. BOEM recognizes the differing opinions stakeholders have regarding this topic.
0032-026	BOEM does not provide any data to support the assumptions that the mitigation measures are sufficient or that effects will disappear after decommissioning; conjecture is rampant throughout this document.	Since this comment does not provide specific locations in the DEIS where potential issues may exist, this response provides a general explanation of updates made in the FEIS to address the magnitude and duration of impacts as well as the impact determinations overall. Table 3-1 in Appendix B of the FEIS defines the impact levels applied to the adverse and beneficial impacts assessed in the document. The resource-specific sections in Chapter 3 and Appendix A of the FEIS have been updated to provide additional information and data related to the magnitude, duration, geographic extent, and/or frequency of potential impacts, as appropriate, to support impact determinations. Furthermore, Appendix D of the FEIS has been updated to clarify the expected effect of mitigation measures on impact levels.
0032-027	BOEM states that 5-6 lobster boats fish in the WDA and that no pots and traps and fishing effort by longline occurred in the WDA or OECC as stated in the COP Section 7.6.2.2 Volume III. This is a misrepresentation by BOEM of the actual information contained within the cited COP. Vineyard Wind’s COP clearly states that static gear fisheries (gillnets, traps/pots) likely fish in the WDA and along the OECC. See Vineyard Wind COP Vol. III at 7-72. This error must be corrected.	Appendix A of the FEIS has been revised to clarify information regarding lobster fishing in the area.
0032-028	Monitoring is an assessment of the environmental and ecological conditions. It is a best management practice and should be required pre-, during and post-construction to establish baseline conditions and any resulting effects from a project. Monitoring is not a mitigation technique and should not be included within a mitigation plan. Research is also not mitigation. Monitoring and research may help determine mitigation, but the funding of both is not a mitigation technique. Research and monitoring should have their own section separate from mitigation.	Appendix D of the FEIS has been updated as a result of this and other comments to distinguish mitigation and monitoring.

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0033-001	It's time we move forward toward a new energy future focused on clean sources that provide the power we need as a society and minimize impacts on the natural environment and global climate.	Thank you for your comment.
0033-002	Fishing is one of our most historic and important coastal industries from an economic and cultural heritage standpoint. We are encouraged by Vineyard Wind's commitment to working with the fishing industry.	Thank you for your comment.
0033-003	[Vineyard Wind will result in] improved resiliency and emergency planning in the region's historically unreliable electric grid, and the addition of new storage capacity through distributed projects on the Cape Cod, Martha's Vineyard and Nantucket.	Thank you for your comment.
0033-004	Vineyard Wind...will spur the development of a domestic supply chain for the offshore wind industry to support the many other wind areas currently under lease by BOEM as they move into construction.	Section 3.4.1.2 of the DEIS addressed development of supply chain; therefore, no change to the FEIS is warranted.
0034-001	In light of the three recent reports on climate change issued by the Intergovernmental Panel on Climate Change, the UN Environmental Programme and the US Federal government, it is critical that we make a swift transition to renewable energy and abandon our reliance on fossil fuels. The Vineyard Wind offshore wind project...will help reduce our MA carbon emissions by over 1.6 metric tons per year (apparently the equivalent of taking 325,000 vehicles off the road). It will provide 400,000 homes with wind power energy and would meet the MA goal of 3200 MW of offshore wind, meeting 25% of the state's energy needs with the clean, renewable, locally sourced energy.	Thank you for your comment.
0034-002	The fact that it is locally sourced with a community oriented development approach is an important aspect of this well thought out project.	Thank you for your comment.
0035-001	This project is important to us because it will help alleviate our dependence on fossil fuels while providing a clean source of energy-one that could become a major player in our region.	Thank you for your comment.
0035-002	Using wind power will also result in health benefits as it will improve our air quality and result in fewer cases of asthma and other respiratory illnesses which are prevalent in our region.	Section A.8.1 in Appendix A of the FEIS has been revised to clarify the health and climate benefits of the proposed Project.
0035-004	Vineyard Wind will become the first commercial scale off shore wind farm in the US and hopefully will lead to the creation of many more such projects because we must drastically reduce climate change emissions and the resulting impacts on our environment.	Thank you for your comment.
0036-001	While it is true that there will be impacts from the construction of the turbines and the infrastructure to allow the generated power to reach land, I believe the benefits outweigh the impacts. With wind power, the only impacts to the land will be during construction, after which the power generated will be 100% clean and renewable.	Thank you for your comment.

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0038-001	The EIS fails to sufficiently quantify and account for the warming that is generated by the Project. A recent study (“the Harvard Wind Study”) conducted by Harvard University Professor David Keith shows that a wind energy facility over the next critical ten years is worse for the climate than a natural gas fired electric generating facility...With U.N. scientists stating that the next ten years is determinative, adding yet another energy facility that has significant adverse marine and other impacts and that does not reduce climate impacts is unwise and not in the public interest.	As part of the EIS process, BOEM has reviewed the Keith research and others for potential negative impacts related to wind farm deployment. While this research shows localized heating in the vicinity of land-based wind farm deployments based on observed data, the localized heating is caused by a redistribution of heat in the boundary layer, not the creation of additional heat-capturing greenhouse gasses or additional heat itself. The Keith study, in particular, asserts that “The climate impacts of wind and solar are small compared with the impacts of the fossil fuels they displace, but they are not necessarily negligible.”, and also that “While these impacts differ from the climate impacts of GHGs in many important respects, they should not be neglected.” The assertion by the commenter stating that the addition of wind based energy does not reduce “climate” impacts or is worse for the “climate” is a misnomer. The study shows that the redistribution of heat caused by wind turbines can cause surface temperatures to increase when the windfarm is operating, primarily at night this is different than the suggestion that such heating potentially contributes to global climate change more than fossil-fuel generated energy. Therefore, revisions to the FEIS were not warranted.
0038-002	BOEM and the cooperating agencies failed to address the foreseeable indirect impacts from downstream displacement of United States based renewable energy resources. BOEM and the cooperating agencies also failed to discuss the cumulative effects of these emissions. Combined, it is reasonably foreseeable that the proposed Project, together with the other offshore wind projects approved or proposed, could result in the inability to reduce global warming in the next 10 years as U.N. scientists have said must be done, further endangering the Earth’s climate, as it nears the tipping point.	As part of the EIS process, BOEM has reviewed the literature for potential negative impacts related to wind farm deployment. The Keith study, in particular, asserts that “The climate impacts of wind and solar are small compared with the impacts of the fossil fuels they displace, but they are not necessarily negligible.” Appendix A lists the reasonably foreseeable future projects that could generate impacts alongside the proposed Project; this includes several renewable energy projects, and it also states why some were not considered reasonably foreseeable. Further revisions to the FEIS were not warranted.
0038-003	The EIS assumes without analysis that the ability of utilities within ISO-NE to purchase electricity from an offshore wind facility is desirable and is a solution to the strawman used by the EIS. The EIS assumes, without analysis, that the offshore wind generation from the Project is renewable, sustainable, and does not emit atmospheric pollutants, and does not itself add to global warming over the next decade. Such an assumption does not pass the muster of informed decision making.	Section 1.2 of the DEIS provided a discussion of the Purpose and Need for the proposed Project. As such, no change to the FEIS was warranted.
0038-004	The EIS assumes, without analysis, that the offshore wind generation from the Project does not displace other forms of renewable energy generation that would come online but for the Projects...The EIS assumes, without analysis, that the offshore wind generation from the Project would displace a future electric generating plant that would use natural gas as fuel. Such [assumptions do] not pass the muster of informed decision making.	Section A.8.1.2 in Appendix A of the FEIS has been revised to describe the impact of greenhouse gas emissions that would result from construction, operation, and decommissioning of the proposed Project.

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038-005	BOEM and the cooperating agencies have failed to take a hard look at the direct, indirect, and cumulative impacts to the climate from GHG emissions and warming caused not by GHG emissions from the Project but its alteration of wind flow, and failed to discuss the severity of these impacts.	Potential impacts of GHG emissions associated with the proposed Project are discussed in the revised Section A.8.1 in Appendix A of the FEIS. The literature referenced by the commenter regarding altered wind flow does not support including this analysis in the EIS. Further revisions to the FEIS were not warranted.
0038-006	[The DEIS] does not properly and adequately analyze the “No-Action” alternative..... The EIS’s and BOEM’s assumption that the No-Action will have no net effect on renewable energy generation, economic benefits or climate benefits contradicts fundamental economic principles. Significant changes in renewable energy supply will affect renewable energy’s price and, therefore, consumption and emission levels...in the No-Action Alternative, the demand for U.S.-based onshore renewable energy generation would be higher; and unlike the proposed Project’s effects in the first ten or longer years, U.S.-based onshore solar electric generation would reduce greenhouse gas emissions and overall climate effects. Similarly, in the No-Action Alternative, the higher demand for U.S.-based onshore renewable energy generation would result in increased economic benefits for the United States, as compared to the proposed Project’s economic benefits.	GHG emissions associated with the proposed Project are discussed in the revised Section A.8.1. BOEM's role is to evaluate the potential effects of the proposed Project as outlined in the COP as well as the impacts of a range of reasonable alternatives as required by NEPA. New information quantifying averted emissions using AVERT relative to existing power generation has been added to Section A.8.1 of the FEIS. BOEM acknowledges that, if approved, the proposed Project could be the nation’s first large-scale offshore wind energy project. Comments received on the SEIS from companies in the offshore wind industry have noted that approval of the Project would encourage and support continued investment in other offshore wind projects and the creation of a domestic supply chain for the offshore wind industry in the eastern United States. This could accelerate the offshore wind industry and could lead to additional future project announcements. While it is possible that the selection of the No Action Alternative could affect the development of the U.S. offshore wind industry, for the purposes of capturing the maximum impact case this analysis assumes the outstanding state demand for offshore wind is still met.
0038-007	The EIS and BOEM fail to analyze the Project’s cumulative effects with other projects that have been approved by federal agencies such as the various hydro-electric projects from Canada...The failure to analyze impacts wind and solar, with or without storage, and other forms of onshore renewable generation as a reasonably foreseeable alternative is clear error. The failure of the EIS to analyze the potentially devastating impacts on United States onshore renewable energy producers is clear error.	BOEM's role is to evaluate the potential effects of the proposed Project as outlined in the COP as well as the impacts of a range of reasonable alternatives as required by NEPA. BOEM does not have control over any state or grid operator structure and whether or not the proposed Project would compete with other renewable projects outside of BOEM's purview. New information quantifying averted emissions using AVERT relative to existing power generation has been added to Section A.8.1 of the FEIS. BOEM acknowledges that, if approved, the proposed Project could be the nation’s first large-scale offshore wind energy project. Comments received on the SEIS from companies in the offshore wind industry have noted that approval of the Project would encourage and support continued investment in other offshore wind projects and the creation of a domestic supply chain for the offshore wind industry in the eastern United States. This could accelerate the offshore wind industry and could lead to additional future project announcements. While it is possible that the selection of the No Action Alternative could affect the development of the U.S. offshore wind industry, for the purposes of capturing the maximum impact case this analysis assumes the outstanding state demand for offshore wind is still met. In light of the number of potential future offshore wind energy developments listed in Appendix A and the Commonwealth of Massachusetts’s mandate that

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		distribution companies jointly and competitively solicit proposals for offshore wind energy generation (220 Code of Massachusetts Regulation [CMR] 23.04(5)), there is no evidence that any proposed alternative, including the “No-Action” alternative, would have a significant effect on the economics of renewable energy in the region. Therefore, further revision of the FEIS was not warranted.
0038-008	Changes in the relative amounts of coal, natural gas, renewable sources, and nuclear energy used to generate electricity—as well as changes in total energy demand—would, in turn, change total greenhouse gases emissions. In short, the EIS’ unexamined and unsupported assumption that the No-Action Alternative would have no effect on greenhouse gas emissions is contradicted by fundamental economics and market analyses.	GHG emissions associated with the proposed Project are discussed in the revised Section A.8.1. BOEM's role is to evaluate the potential effects of the proposed Project as outlined in the COP as well as the impacts of a range of reasonable alternatives as required by NEPA. New information quantifying averted emissions using AVERT relative to existing power generation has been added to Section A.8.1 of the FEIS. BOEM acknowledges that, if approved, the proposed Project could be the nation’s first large-scale offshore wind energy project. Comments received on the SEIS from companies in the offshore wind industry have noted that approval of the Project would encourage and support continued investment in other offshore wind projects and the creation of a domestic supply chain for the offshore wind industry in the eastern United States. This could accelerate the offshore wind industry and could lead to additional future project announcements. While it is possible that the selection of the No Action Alternative could affect the development of the U.S. offshore wind industry, for the purposes of capturing the maximum impact case this analysis assumes the outstanding state demand for offshore wind is still met.
0038-009	If the Project is not approved, utilities in ISO-New England will acquire other renewable energy production to satisfy their respective renewable energy goals and standards, and therefore, lower greenhouse gas emissions. In the No-Action Alternative, any renewable energy substituting for the Project may provide a more positive impact on emissions and climate change. Yet, the EIS does not analyze this environmental impact in its alternatives analysis.	GHG emissions associated with the proposed Project are discussed in the revised Section A.8.1. BOEM's role is to evaluate the potential effects of the proposed Project as outlined in the COP as well as the impacts of a range of reasonable alternatives as required by NEPA. New information quantifying averted emissions using AVERT relative to existing power generation has been added to Section A.8.1 of the FEIS. BOEM acknowledges that, if approved, the proposed Project could be the nation’s first large-scale offshore wind energy project. Comments received on the SEIS from companies in the offshore wind industry have noted that approval of the Project would encourage and support continued investment in other offshore wind projects and the creation of a domestic supply chain for the offshore wind industry in the eastern United States. This could accelerate the offshore wind industry and could lead to additional future project announcements. While it is possible that the selection of the No Action Alternative could affect the development of the U.S. offshore wind industry, for the purposes of capturing the maximum impact case this analysis assumes the outstanding state demand for offshore wind is still met.
0038-010	The conclusions used for the No-Action Alternative baseline are preposterous, fail to use accepted substitution analysis used by Interior, BOEM and other	The description of the No Action Alternative in Section 2.1.6, and the description of impacts of the No Action Alternative throughout Chapter 3 and Appendix A of

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	federal agencies in conducting environmental impact statements, and are the type of uninformed review that has been rejected by the courts.	the FEIS have been revised to provide additional information. These discussions comply with the procedural requirements of NEPA.
0038-011	The failure to consider other generation resources because they would not require a permit within BOEM’s or the cooperating agencies’ jurisdiction is clear error.	The description of the No Action Alternative in Section 2.1.6, and the description of impacts of the No Action Alternative throughout Chapter 3 and Appendix A of the FEIS have been revised to provide additional information. These discussions comply with the procedural requirements of NEPA. Considering the approval of another technology, as opposed to the Project proposal, would equate to the no action alternative because Vineyard Wind only acquired the rights to develop a wind energy project in their lease.
0038-012	The “Socioeconomic” impacts of the No-Action alternative are manifestly wrong. The No-Action alternative would result in different renewable energy projects filling its place. And because those alternative projects would be located entirely onshore in the United States and fully within state and local taxing jurisdictions, they would far surpass the Project in economic benefits to the United States.	In light of the number of potential future offshore wind energy developments listed in Appendix A and the Commonwealth of Massachusetts’s mandate that distribution companies jointly and competitively solicit proposals for offshore wind energy generation (220 CMR 23.04(5)), there is no evidence that the “No-Action” alternative would have a significant effect on the economics of renewable energy in the region. Therefore, further revision of the FEIS was not warranted.
0038-013	The analysis of the No-Action alternative for Air Quality is incorrect. The Project would be replaced with renewable energy projects located closer to the actual electrical load. Those projects would have the higher air quality benefits, and GHG benefits compared to the Project because they would be more efficient, and would not require the adverse climatic impacts caused by WTGs.	GHG emissions associated with the proposed Project are discussed in the revised Section A.8.1. In light of the number of potential future offshore wind energy developments listed in Appendix A and the Commonwealth of Massachusetts’s mandate that distribution companies jointly and competitively solicit proposals for offshore wind energy generation (220 Code of Massachusetts Regulation [CMR] 23.04(5)), there is no evidence that the “No-Action” alternative would have a significant effect on greenhouse gas emissions in the region. There is no evidence of “adverse climatic impacts caused by WTGs.” Rather, the redistribution of heat caused by wind turbines can cause surface temperatures to increase when the windfarm is operating, primarily at night; this is different than the suggestion that such heating potentially contributes to global climate change more than fossil-fuel generated energy. Therefore, further revision of the FEIS was not warranted. BOEM’s role is to evaluate the potential effects of the proposed Project as outlined in the COP as well as the impacts of a range of reasonable alternatives as required by NEPA. BOEM does not have control over any state or grid operator structure and whether or not the proposed Project would compete with other renewable projects outside of BOEM’s purview. New information quantifying averted emissions using AVERT relative to existing power generation has been added to Section A.8.1 of the FEIS.
0038-014	The No-Action alternative must also take into account the fact that American jobs and tax revenues to the United States would be lost if Project were built. The Project will displace American jobs related to construction and operation of onshore renewable energy projects in the United States that would fill any void if	Section 3.6 of the FEIS has been updated in response to on-going agency consultations and public comment to address the potential impacts on demographics, employment, and economics. Potential effects on employment, jobs, and tax revenues are assessed in the revised Section 3.6 of the FEIS.

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	the Project were not built. The EIS has not analyzed those economic impacts and the loss of American jobs and tax revenues if the Project were built.	
0038-015	[The DEIS] fails to take a hard look at alternatives thus failing to comply with EPA’s 404(b)(1) guidelines. The EIS violates the Clean Water Act’s (“CWA’s”) requirements by not taking a hard look—indeed not taking any look—at the proposed purpose of the Project being able to be accommodated by onshore renewable energy.	Section C.5 in Appendix C of the FEIS has an updated discussion of Alternatives Considered but not Analyzed in Detail for the proposed Project. Table 1.3-1 in Appendix B of the FEIS has updated the status of permits and consultations required for the proposed Project. USACE is the agency that would be responsible for regulating activities under Section 404 of the Clean Water Act. In addition, Appendix C (formerly Chapter 4) of the FEIS has been updated with information on the coordination and consultation process to date for the proposed Project, and as noted in the Appendix C, USACE is a cooperating agency in the preparation of the EIS.
0038-016	The DEIS simply fails to offer any explanation as to why Project meets the public interest test, and does not contain sufficient information to form the basis of a conclusion that the Project meets the test... In order to have taken a hard look at whether the proposed Project meets the public interest test, BOEM would need at the very least to conduct a thorough review of the ISO-NE electricity supply and alternatives to meet renewable energy demand...Moreover, in order to determine that the proposed Project meets the public interest test, a thorough review of its potential competitive effects on United States onshore based generators must be conducted. The EIS made no such effort. The proposed Project does not satisfy the public interest test.	Under NEPA and OCSLA, BOEM’s evaluation of the Project does not require a public interest determination. Further revisions to the FEIS were not warranted.
0038-017	The proposed Project would create vulnerabilities to the New England electric grid by concentrating so much electricity from one source. No analysis has been conducted to compare the Project to distributed generation sources near load that could form the basis for local micro-grids and reduce the grid’s risk to severe weather events as well as criminal acts.	The proposed Project capacity would equal less than 7 percent of the present electric generating capacity in Massachusetts alone; therefore, there is no significant risk of “concentrating so much electricity from one source.” Considering another technology, such as distributed generation, as opposed to the project proposal would equate to the no action alternative because Vineyard Wind only acquired the rights to develop a wind energy project in its lease. Further revisions to the FEIS were not warranted.
0038-018	[The DEIS] fails to take a hard look at the increased likelihood of a catastrophic hurricane, category 3 or above, directly hitting the Project. The EIS fails to properly analyze the effects of climate change on hurricane activity in the Northeast and the Project area over the next 30 years, which could cause catastrophic failure of the turbines, and leave turbine parts and oil and chemical spills in the Atlantic and reaching the shores of Martha’s Vineyard, Nantucket, Cape Cod and Rhode Island. Being built to survive maximum sustained wind speeds of up to 112 mph means that the WTGs are only designed to survive a category 2 hurricane. It is certainly not a “low” probability that the Northeast would experience a category 3 or above hurricane over the next 30 years. To the	The FEIS Appendix E discusses hurricane data, and the COP Volume II-A Section 2.2.1 indicates that the average recurrence interval for Category 3 hurricanes in the WDA is approximately every 50 years. Section 2.3 of the FEIS also discusses potential effects of the proposed Project being hit by a hurricane. More precise forecasts of hurricane frequency in future climate scenarios are not likely to be significantly different from currently available data. Therefore, further updates to the FEIS are not warranted.

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	<p>contrary, as the EIS recognizes stronger storms will occur. Thus it is likely that one or more such events would occur.</p>	
0038-019	<p>[The DEIS] fails to examine the 25-year term of the authorization. While it is acceptable for the DEIS to analyze a 30-year term, the EIS must also analyze the only term that is authorized, which is 25 years from COP approval. The Harvard Wind Study concludes that a facility such as the Project has negative climate effects for the first 10 years, and offsetting those negative impacts will take a century. By extending the EIS study period to longer than the authorized term, the amount of positive climate effects would be overstated.</p>	<p>The referenced study referenced localized heating effects caused by land-based windfarms, mostly at night. These are caused by mixing the boundary layer, not adding heat to the Earth’s atmosphere. As such, there is no contribution to global climate change and the comparison of localized transient heating to global warming is incorrect. The following is a summary of that information and incorporates new information specific to the Proposed Action.</p> <p>The temperature of the Earth’s atmosphere is regulated by a balance between the radiation received from the sun, the amount reflected by the earth’s surface and clouds, the amount of radiation absorbed by the earth, and the amount re-emitted to space as long-wave radiation. Greenhouse gases (GHGs) keep the Earth’s surface warmer than it would otherwise be because they absorb infrared radiation from the earth and, in turn, radiate this energy back down to the surface. Although these gases occur naturally in the atmosphere, there has been a rapid increase in concentrations of GHGs in the Earth’s atmosphere from human sources since the start of industrialization, which has caused concerns over potential changes in the global climate. The primary GHGs produced by human activities are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), and halocarbons (MMS 2007a).</p> <p>The surveying, construction, and decommissioning activities associated with the proposed action would produce GHG emissions. As GHGs are relatively stable in the atmosphere and are essentially uniformly mixed throughout the troposphere and stratosphere, the climatic impact of GHG emissions does not depend upon the source location. Therefore, regional climate impacts are likely a function of global emissions. The causes and effects of climate change can be summarized as follows. First, GHGs are emitted into the atmosphere, causing global warming (i.e., an aggregate average increase in the temperature of the Earth’s atmosphere). Second, global warming induces the climate to change in disparate ways at various places around the globe, altering global precipitation regimes, decreasing the salinity of the oceans, and altering the seasons. Finally, climate change leads to impacts on the environment, such as changes in the structure of an ecosystem, changes in air quality, a reduced supply and increased cost of food, warming polar regions, higher precipitation totals, sea level rise, extreme temperatures, and severe weather events (EPA 2012). Additionally, uptake of CO₂ in marine waters decreases the pH buffering capacity of the ocean.</p>

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		BOEM does not agree with the assumption that offshore renewable energy projects result in more adverse impacts on climate change than fossil-burning projects, as proposed by the commenter. In fact, the project is expected to have a beneficial effect on climate change when compared to other energy projects that use fossil fuels for energy generation purposes. Compared to a similarly sized fossil fuel-powered generating station or to the generation of the same amount of energy by the existing grid, the proposed Project would have an overall beneficial impact on GHG emissions.
0038-020	[The DEIS] fails to properly analyze the effect on marine life and fisheries...But [the analysis provided in Section 3.4.5.12] does not account for the additional stress on the marine population caused by the increase in temperatures caused by the Project itself. See, Harvard Wind Study. Indeed, EIS section 3.4.5.12 concedes that the analysis on marine and fish stocks is deficient. Such incomplete analysis does not comply with NEPA, and does not provide information sufficient for either BOEM or the Corps to make the required determinations.	As part of the EIS process, BOEM has reviewed the research for potential negative impacts related to wind farm deployment. While research shows localized heating in the vicinity of land-based wind farm deployments based on observed data, the localized heating is caused by a redistribution of heat in the boundary layer, not the creation of additional heat-capturing greenhouse gases or additional heat itself. The Harvard study, in particular, asserts that “The climate impacts of wind and solar are small compared with the impacts of the fossil fuels they displace, but they are not necessarily negligible.”, and also that “While these impacts differ from the climate impacts of GHGs in many important respects, they should not be neglected.” The assertion by the commenter stating that the addition of wind based energy does not reduce “climate” impacts or is worse for the “climate” is a misnomer. The study shows that the redistribution of heat caused by wind turbines can cause surface temperatures to increase when the windfarm is operating, primarily at night this is different than the suggestion that such heating potentially contributes to global climate change more than fossil-fuel generated energy. Therefore, revisions to the FEIS were not warranted.
0038-021	[The DEIS] fails to discuss the potential impact on fisherman and navigation from the microclimate and potential fog creating ability of the Project as is illustrated below by a photo of the Horns Rev wind farm.	Section 2.3 of the DEIS identified the non-routine activities that could occur from the Proposed Action. The revised Section 3.11.2 of the FEIS discusses fog conditions.
0039-001	We write today in support of the Vineyard Wind Project...[the project] will reduce emissions of CO2 by 1.6 million tons per year, as well as significantly ease regional air pollution by NOx and SO2... the project will make a very significant contribution to moderating climate change.	Thank you for your comment.
0039-002	The Vineyard Wind project will pioneer our local and regional action to reduce our own contribution to greenhouse gas emissions, and help us sustain our community in the face of this change.	Thank you for your comment.
0039-003	Our island cooperative, Vineyard Power, is the local partner for the Vineyard Wind project, and has provided liaison services to Vineyard Wind to mitigate possible environmental and economic impacts as viewed by Island towns. Vineyard Wind has been very responsive and arranged to utilize our Island expertise and capabilities during all phases of the project.	Thank you for your comment.

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0040-001	The [DEIS] clearly demonstrates that the project has taken the necessary steps to minimize potential negative impacts to the environment and local communities.	Thank you for your comment.
0040-002	The DEIS provides an overview of a project that will do far more good than harm. Vineyard Wind is committed to working with local communities as the project moves into the construction phase and beyond.	Thank you for your comment.
0040-003	Vineyard Wind’s project has the potential to set the standard for an industry that is at risk of being dominated by multi-national oil and gas giants with a less than stellar environmental protection and community outreach track record. Allowing this project to proceed will put the other offshore wind developers on notice and let them know what steps they will need to take to obtain the necessary permits for their projects.	Thank you for your comment.
0041-001	It is imperative that initiatives aimed at increasing the proportion of energy we produce from renewable sources be given the utmost consideration... I urge you to not delay this wind farm and to allow it to proceed with all the necessary cautions.	Thank you for your comment.
0042-001	Wind energy is vital to our continued survival as a state and as a planet.	Thank you for your comment.
0042-002	The proposed farm is in an area that is unpopular for fishing and would only be a inhibition against fishing during it’s construction, but the continued degradation of our estuary due to our green house gas emissions is putting us on a track to a dead ocean, which I argue, would be a much greater burden on our fishermen.	Thank you for your comment.
0043-001	Renewable energy needs to be be the focus of our energy future... Time is critical and with climate change already impacting so many parts of our world I truly believe that it is our turn to act.	Thank you for your comment.
0043-002	As a full time resident and property owner on Martha’s Vineyard I understand there will be disturbances during the construction phase of this project. I think the the long term benefits far outweigh the short term disturbances.	Thank you for your comment.
0044-001	Non-supporters may argue that this project might ruin the fisherman’s jobs and provide harmful situations for marine life, however, the company is already coming to a consensus with the fishermen that will benefit both sides, while also putting three million dollars into marine mammals and preserving their habitats and ensuring their safety.	Section 3.10.2 of the FEIS has been revised to include a discussion of displacement and potential conflict over fishing grounds and voluntary compensation. Section 3.10 of the FEIS has been updated to include details of mitigation and monitoring measures relative to commercial fisheries, including voluntary financial compensation. Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0044-002	In conclusion, the transition to wind energy as a major energy resource around Massachusetts, as well as nationally, needs to be highly considered and hopefully soon implemented.	Thank you for your comment.
0045-001	Due to the fact that offshore wind farms can effectively power local communities, they are able to power those communities at a lower cost. Vineyard Wind’s	Thank you for your comment.

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	Project, an 800 Megawatt system, will be able to save Massachusetts \$1.4 billion in its 20 year lifespan. Not to mention the renovation, and repair costs that our current coal and oil plants have to regularly complete. The Commonwealth's economy will also be given more than 3,600 new jobs, in communities like New Bedford, and Southeastern Mass.	
0045-002	Vineyard Wind's farm, will also provide an artificial reef for marine life, and prize recreational fishing grounds. One of the companies largest priority is integrating seamlessly to its community, which means that they are working hand and hand with commercial fisherman, in order to cause no harm to their industry.	Section 3.10.2 of the FEIS has been revised to include additional information on Vineyard Wind's coordination with the commercial fishing industry. Section 3.9.2 of FEIS has been revised to address attraction of fish to WTG foundations.
0046-001	The distance between wind generators of 0.75 to 1.0 nautical miles is totally unacceptable. Likewise the configuration of the wind generators within the array run counter to suggestions repeatedly made by the clam industry at many public meetings. The clam industry has emphatically maintained that wind generators within a wind array must be a minimum of 2 nautical miles apart, in straight rows and columns, and in alignment with the prevailing tidal currents. Unless this spacing, configuration, and orientation are adhered to, clam vessels cannot operate safely within the array and the wind array will become a de facto clamming exclusion zone or marine protected area where clamming cannot occur in the future.	Section 3.10.2 of the FEIS has been revised to include the following text: "Clam industry representatives stated that their operations require a minimum distance of 2 nautical miles between WTGs, in alignment with the prevailing tidal currents for safe operations." Section 3.10.2 of the FEIS also acknowledges that large fishing vessels could find it more challenging to travel through the WDA or deploy fishing gear in the WDA if spacing between WTGs is less than 1 nautical mile. Further, some recreational and for-hire users recommended spacing of more than 3 nautical miles for WTGs. However, it has been also noted that trawling vessels require 180-degree turning diameters between 0.16 nautical mile and 0.86 nautical mile in good weather and sea conditions (larger diameters would be required in poor weather and sea conditions). In addition, a formula from offshore wind farm and maritime navigation guidance developed by the Permanent International Association of Navigation Congresses found that the minimum fishing vessel channel widths of 0.33 nautical mile and 0.32 nautical mile were calculated for transiting and trawling vessels, respectively. Therefore, while Vineyard Wind's supplemental navigational risk assessment shows that it is technically feasible to navigate and maneuver fishing vessels and mobile gear through the WDA, BOEM is cognizant that maneuverability within the WDA may vary depending on many factors including vessel size, fishing gear or method used, and or by environmental conditions. In addition, BOEM is aware that even when feasible to fish within the WDA, some fishermen might still not consider it safe to do so. However, BOEM also expects that, with time, many fishermen would adapt to WTGs spacing and would be able to fish successfully in the WDA. Effects to navigational safety would be adequately mitigated as described in Section 3.10.2 of the FEIS. In addition, with time, most fishermen would adapt to WTGs spacing and would be able to fish successfully in the WDA.
0046-002	All previous clam industry comments made at many BOEM outreach meetings have been ignored to date and there has been no mention of any compensation funds for lost clamming grounds and future income.	Section 3.10 and Appendix D of the FEIS have been revised to include the Vineyard Wind's voluntary established gear loss and revenue compensation funds for fishing interests based in Rhode Island, Massachusetts, and other states.

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		Please see Section 3.10 and Appendix D of the FEIS for more details on the measures.
0046-003	The EIS downplays the severity of impacts from the development of the wind farm on the benthic shellfish.	Potential impacts on shellfish are described in Sections 3.2 and 3.3 of the FEIS. The FEIS has been updated to include additional potential impact characterizations to benthic resources.
0046-004	...there will be lost revenue for as many years as the wind farm operates and there is no proposed compensation to the clam industry being excluded unnecessarily.	Section 3.10 and Appendix D of the FEIS have been revised to include the Vineyard Wind's voluntary established gear loss and revenue compensation funds for fishing interests based in Rhode Island, Massachusetts, and other states. Please see Section 3.10 and Appendix D of the FEIS for more details on the measures.
0046-005	Also, the cancelled public hearings due to the partial government shutdown should be held as soon as possible and the commenting period must be extended.	The public comment period for the DEIS for the Vineyard Wind Project was extended until February 22, 2019 due to the government shutdown. Furthermore, BOEM rescheduled the five public meetings and they were held on February 11, 12, 13, 14 and 15, 2019. Appendix C (formerly Chapter 4) of the FEIS was updated with this information as well as information regarding the virtual public meetings that were held for the SEIS.
0047-001	The reliance, especially in Massachusetts, on outdated or soon to be retired generation facilities and imported energy is a huge vulnerability, but fortunately we have...offshore wind...There is no time left to delay our transition to new energy technologies...if we cannot curtail our greenhouse gas emissions many of the dire predictions for sea level rise might fall short of the devastation that will occur. Offshore wind is a proven technology, and our best first step in bringing about a sustainable energy future, and averting making unborn generations pay such terrible costs.	Thank you for your comment.
0047-002	During the building and lifespan of this project it will create over 3000 jobs in southeastern MA, some of which will be for the life of the operation.	Thank you for your comment.
0047-003	Finally, the developers are committing to building grid resiliency and vocational programs in the region that will unlock potential for future projects and push Massachusetts towards its mid-century renewable energy goals.	Thank you for your comment.
0048-001	I urge you to approve the Vineyard Wind project to build windmills to generate electricity off the Cape & Islands. We need the generation capacity, and we need that capacity to be from carbon-free energy sources.	Thank you for your comment.
0049-001	[Climate change] greatly affects where I live in West Tisbury, MA on Martha's Vineyard, an island which in the future will largely be claimed by the rising sea if the world does not act to reduce and eventually eliminate the burning of fossil fuels. This must be done by essentially changing over to renewable sources of energy. Offshore wind power is a key element of that renewable energy.	Thank you for your comment.
0049-002	The risk of the Offshore Wind Project's impact on the environment and communities, including fisheries, is very, very low. The risk that continuing to	Thank you for your comment.

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	burn fossil fuels at the current pace will cause the above described effects is not only very high, but virtually a certainty. That makes it a clear choice -- low risk versus a virtual certainty...Thus, I strongly support the Offshore Wind Project in Massachusetts and the approval of the Draft Environmental Impact Statement.	
0050-001	...construction of the Project will serve the public interest by increasing the reliability and diversity of the regional and statewide energy supply while reducing greenhouse gas emissions from the regional power generation grid.	Thank you for your comment.
0050-002	For each route configuration that is continuing through the review process, environmental impacts are comparable on the whole, and have been avoided, minimized, or mitigated consistent with MEPA standards.	Thank you for your comment.
0050-003	I believe Vineyard Wind is making good progress towards a construction approach which will allow the Project to meet its scheduled power supply commitments while working in safe weather conditions and respecting significant marine environmental concerns.	Thank you for your comment.
0050-004	The 800 MW Vineyard Wind Project provides a unique opportunity to maximize the value of the federal investment tax credit (ITC) as the value of the credit is scheduled to be gradually reduced and will not be available for projects that start construction after December 31, 2019.	Thank you for your comment.
0050-006	The community that the Southcoast Energy Challenge serves, New Bedford, is an Environmental Justice Community and the fact that clean wind energy will be able to replace burning fossil fuels around this community, decrease the cost of electricity and create much-needed good jobs in the community is a wonderful gift to our region and it cannot happen soon enough.	Thank you for your comment.
0051-001	As a resident of Martha's Vineyard, I am writing in support of Vineyard Wind's proposed Energy Facility Offshore Massachusetts..I appreciate the work that has gone into making the turbines as environmentally responsible as seems currently feasible... we need alternate energy sources to allow the atmosphere to clean itself as soon as it can.	Thank you for your comment.
0052-001	I am in favor of the project in it's entirety. Wind power is a proven component of our energy supply formula. We just need a lot more of it.	Thank you for your comment.
0052-002	Landfall in Barnstable is a fine alternative to Lewis Bay.	Section 2.5 of the FEIS has been included to identify the agency-preferred alternative.
0053-001	Last March, we released a report, Wind Power to Spare: The Enormous Energy Potential of Atlantic Offshore Wind...Our report found that Massachusetts has the highest offshore wind potential of any state in the nation...equivalent to more than 19 times the states annual electricity consumption. Even if our heating and transportation are converted to electric power a trend that is already underway, and a necessary step toward decarbonizing our economy and preventing the	Thank you for your comment.

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	worst impacts of global warming offshore wind will still be sufficient to power Massachusetts eight times over.	
0053-002	We are especially excited to see the Vineyard Wind project move ahead because it represents the launching point for the American offshore wind industry. Once this project is underway, we will soon see offshore wind farms providing power to states up and down the East Coast. Because this is the first large-scale offshore wind farm in the United States, it is critical for this project to move ahead in a timely fashion.	Thank you for your comment.
0053-003	There has been an extensive process to gather input on the Vineyard Wind project from key stakeholders, beginning with the selection of lease area sites and continuing through multiple stages of the projects design. Vineyard Wind has responded to this input by making adjustments in the project plans, including reducing the number of turbines and moving the site of the cable landing.	Section 1.1 of the DEIS contained information on the background of the process and project. Appendix C (formerly Chapter 4) of the FEIS has been updated with information on the coordination and consultation process to date for the proposed Project.
0053-004	Vineyard Wind is partnering with Vineyard Power, an energy cooperative, to ensure that residents of Marthas Vineyard experience the economic benefits of offshore wind. The company has also committed to significant investments in renewable energy and resiliency in communities throughout Southeastern Massachusetts.	Section 3.4.1.3 of the DEIS provided information on the proposed Resiliency and Affordability Fund. Therefore, no change to the FEIS is warranted.
0053-005	Offshore wind off the Atlantic states could produce enough electricity each year to meet four times those states' electricity consumption (4,574 terawatt hours).	Thank you for your comment.
0053-006	Offshore wind has become affordable. According to Lazard, the average global levelized cost of energy for new offshore wind fell by 27 percent from 2012 to 2017, to a cost that is comparable to a new coal-fired power plant and cheaper than a new nuclear plant over the plants' entire life cycles. Experts predict that offshore wind will continue to fall in price. Bloomberg New Energy Finance projects that the levelized cost of energy for offshore wind will fall by 71 percent by 2040 relative to today's prices.	Thank you for your comment.
0053-007	Experience at home and abroad has shown that responsible development of offshore wind can avoid harm to the environment and wildlife, including the North Atlantic right whale.	Thank you for your comment.
0055-001	...imperative that we develop alternative energy sources. Fossil Fuels are a cheap way to get energy but are an old technology that delivers old and dirty energy.	Thank you for your comment.
0056-001	Embracing alternative forms of energy production (wind, solar, thermal) is an imperative and I call upon federal authorities to expedite proposals such as this one. We can no longer afford to wait and must act immediately to curb climate change caused by greenhouse gasses.	Thank you for your comment.
0058-001	Undersea cables are neither new nor unusual	Thank you for your comment.
0058-002	The Vineyard Wind project offers an opportunity to reduce carbon emissions, an urgent and necessary step in protecting our environment.	Section 1.2 of the DEIS provided a discussion of the Purpose and Need for the proposed Project. As such, no change to the FEIS was warranted.

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0058-003	As you review the proposed Project, please bear in mind the consequences of not moving ahead with offshore wind: continued addiction to fossil fuels, energy and economic insecurity, and climate change. In other words, not building this project, or imposing excessive constraints, would cause environmental impacts.	Section 1.2 of the DEIS provided a discussion of the Purpose and Need for the proposed Project. As such, no change to the FEIS was warranted. Each resource in Chapter 3 and Appendix A of the FEIS discusses the impacts of the No Action Alternative.
0059-001	We need more renewable energy projects--such as the Vineyard Wind project--to address the biggest crisis of our time and place.	Thank you for your comment.
0060-001	There is an urgent need for renewable energy sources globally and nationally. Cape Cod is a fragile and beautiful ecosystem; we must act now to preserve it!	Thank you for your comment.
0061-001	Offshore wind resource is desperately needed to add fossil-free energy to our supply. In the case of the Vineyard Wind project, is clear the environmental benefits far outweigh the negative.	Thank you for your comment.
0061-002	Further, any negative impacts can only be addressed by allowing this preliminary offshore wind farm effort installation from which to learn and adjust future efforts in offshore wind energy.	Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. Additional mitigation and monitoring measures may arise from consultations and coordination with Federal and State resource agencies. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0062-001	Cape Cod and the USA need clean, renewable energy!	Thank you for your comment.
0062-002	This project will bring good jobs to Massachussets and help us develop engineering, logistics, technology for future offshore/energy projects.	Thank you for your comment.
0063-001	As a resident of Yarmouth, I was sad to see our town turn away from the Vineyard Wind proposal for a cable under Lewis Bay that would bring renewable wind energy onto Cape Cod through Yarmouth. I have followed the revision process and appreciate the Town of Barnstable's acceptance of the alternate route.	Thank you for your comment.
0063-002	I see that Vineyard Wind has adapted its plan to address concerns, one by one, as they have been raised. It is exciting to see that the proposal is coming up for final approval.	Thank you for your comment.
0064-001	Communities on Cape Cod, Marthas Vineyard, and Nantucket have been consulted, and it is my understanding that the objections are few and have been properly addressed	Thank you for your comment.
0064-002	we must approve the construction of Vineyard Wind, and many other renewable energy projects, in order to shift mankind's energy utilization away from fossil fuels	Thank you for your comment.
0065-001	We who live surrounded by water where rising seas are obvious, can't overstate the importance of a fossil free energy facility that is large enough to have a significant contribution towards reducing greenhouse gases.	Thank you for your comment.
0065-002	There are some known short term, manageable impacts, but any delay in this project going forward carries long term and much greater environmental impacts.	Thank you for your comment.
0066-001	A boon to the economy and the environment,	Thank you for your comment.

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0067-001	...installation of the foundations for wind turbines can cause damage to the seafloor and other marine resources. In the past years, installation techniques and vessels of the Dutch marine construction industry for the installation of offshore wind have evolved in their capability to mitigate negative effects to the environment.	Thank you for your comment.
0067-002	An important advantage of Third generation installation vessels is that they are able to install wind turbines whilst floating, without the use of anchors or jack-up legs...This generation of vessels offers significant advantages in comparison to conventional installation techniques (e.g. jackup vessels) as these can mitigate negative effects to the environment (such as seabed distortion by anchoring or jackup legs), limit distortion for the fishery industry due to reduced displacement of fish, and increases (cost-) efficiency for the installation phase (time needed for installation).	Section 2.1.1.1 and its subsections of the FEIS include a discussion on the types of vessels proposed to be used for the Proposed Action.
0067-003	... in the DEIS BOEM touches only briefly on the environmental benefits of suction buckets. Details on the use of jackets equipped with suction buckets are not included. We recommend to include this in the FEIS, as suction bucket foundations have important advantages in comparison to conventional pile-driving...The use of jackets in combination with suction buckets eliminates the need to drive piles into the sea floor and therefore does mitigate distortion of the sea floor. Consequently, it eliminates measures for noise mitigation measures such as big bubble curtains...Suction buckets need less deep penetration in the seabed (compared to monopiles), allowing operators to avoid troublesome ground conditions. By avoiding these, the construction risks for the project will also be reduced...This set up structure benefits to the environment, because it causes less disruption to local porpoise populations and can be completely decommissioned at the end of its lifetime.	As stated in Section 2.1.7 of the DEIS, this type of alternative foundation was an alternative considered but not analyzed in detail. Section 2.1.7 of the DEIS included an explanation of why this foundation type was not analyzed further as an alternative. Therefore, no revisions to the FEIS are warranted.
0067-004	In the DEIS, BOEM concludes nevertheless that suction buckets (as well as gravity based and floating wind turbines) are not feasible in the project area. BOEM also states that in comparison to monopile driving, suction bucket foundations would increase seabed disturbance and would create less room for fishing activities between turbines when compared to monopile or jacket foundations. Furthermore, the claim that suction buckets could increase long-term environmental impacts over those from monopile or jacket foundations is not substantiated and is in our view incorrect. In contrast, we believe that suction buckets limit impact to the seabed and do have a smaller footprint than suggested in the DEIS.	As stated in Section 2.1.7 of the DEIS, this type of alternative foundation was an alternative considered but not analyzed in detail. Section 2.1.7 of the DEIS included an explanation of why this foundation type was not analyzed further as an alternative. Therefore, no revisions to the FEIS are warranted.
0069-001	...in construction phase of the project I am concerned if we will be able to access the squid grounds that basically at certain times of the year are in direct conflict	As already discussed in the DEIS Section 3.4.5.3, BOEM acknowledges that “squid resource is located where construction activity is occurring then the resource may not be available during the time that the resource and construction

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	of where we harvest squid. I have gone over charts where we have worked in the past and we have fished exactly where the turbines will be put in place.	activity overlap.” As described in Appendix D of the DEIS BOEM is considering a Dynamic Squid Fishing Avoidance Plan as mitigation measure that would require daily communication between squid fishery representatives and Vineyard Wind so that harvesters are aware of the day’s activities and the developer is aware of where fishing is occurring. As such, no revisions to the FEIS are warranted.
0069-002	once the project is completed, what is going to happen to the migration patterns of squid with a lot of electrical current that will be buried bringing the electricity to the mainland. Due to the fact that squid are extremely sensitive to environmental forces...	Section 3.3.2 of the FEIS has been updated to include an additional study on the effects of EMF on invertebrates. There is no scientific information to suggest that the expected level of EMF could affect squid migration.
0069-003	Us fisherman...need to be financially compensated for any unseen future disruptions this may have on not only the fisherman but every other business that is tied to the fishing industry that may be negatively impacted...I am demanding a payoff of 1 million US dollars to compensate me and my family so I can possibly survive if it all goes wrong.	Section 3.10 and Appendix D of the FEIS have been revised to include the Vineyard Wind’s voluntary established gear loss and revenue compensation funds for fishing interests based in Rhode Island, Massachusetts, and other states. Please see Section 3.10 and Appendix D of the FEIS for more details on the measures.
0069-004	consider installing these wind farms in the desert where they belong and will not have nearly the negative impact that they will being installed in the ocean.	Considering an onshore location as opposed to the project proposal would equate to the no action alternative because Vineyard Wind only acquired the rights to develop a wind energy project in its lease. Further revisions to the FEIS were not warranted.
0070-001	believe this Offshore Wind Project will be a good economic stimulator for the local communities, especially where the wind mill components are imported by ship, staged for offshore delivery, and where the production and test facilities are located.	Section 3.4.1.1 of the DEIS addressed the potential port facilities and Section 3.4.1.3 of the DEIS explained the determination of minor economic benefit. Therefore, no change to the FEIS is warranted.
0070-002	The project also gives local contractors the opportunity to gain business in support of installation and maintenance tasks, and could result in increased employment with local contractors and suppliers.	Section 3.4.1.3 of the DEIS addressed the projected jobs and business activity in southeastern Massachusetts. Therefore, no change to the FEIS is warranted.
0071-001	I also have concerns regarding the public meetings not being rescheduled due to the government shutdown.i feel it’s important for the public to speak face to face with vineyard wind reps. I feel the comment period should be extended so those that do not have computer access can have some input...The comment period needs to be extended until the government shutdown is over and people can be heard. It’s convenient for vineyard wind and boem to move forward without the public hearings. I feel that it’s not legal to go forward until everyone is given a chance for input.	The public comment period for the DEIS for the Vineyard Wind Project was extended until February 22, 2019 due to the government shutdown. Furthermore, BOEM rescheduled the five public meetings and they were held on February 11, 12, 13, 14 and 15, 2019. Appendix C (formerly Chapter 4) of the FEIS was updated with this information as well as information related to the virtual public meetings held for the SEIS.
0071-002	These windmills could potentially be the nail in the coffin for RI Squid boats.	As already discussed in the DEIS Section 3.4.5.3, BOEM acknowledges that “squid resource is located where construction activity is occurring then the resource may not be available during the time that the resource and construction activity overlap.” As described in Appendix D of the DEIS BOEM is considering a Dynamic Squid Fishing Avoidance Plan as mitigation measure that would

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		require daily communication between squid fishery representatives and Vineyard Wind so that harvesters are aware of the day's activities and the developer is aware of where fishing is occurring. As such, no revisions to the FEIS are warranted.
0071-003	There's been no research with regards to impact on invertebrates.	Section 3.3.5 of the DEIS described the studies of the invertebrates in the Project area and described the potential impacts of the proposed Project on invertebrates. As such, no additional changes to the FEIS are warranted.
0072-001	The EIS clearly shows that development of the Vineyard Wind project will provide clean, renewable and cost-effective energy for homeowners and businesses on Cape Cod and in our region.	Thank you for your comment.
0072-002	It will create jobs not only in construction and transportation, but also in tourism, recreational and commercial fishing and all of the businesses that support those industries.	Section 3.4.1.3 of the DEIS addressed the impact on recreation/tourism and commercial fishing as components of economic impact. Therefore, no change to the FEIS is warranted.
0072-003	Vineyard Wind has diligently engaged with stakeholders like me and the industries that form the Blue Economy extremely well.	Thank you for your comment.
0073-001	I have looked over the Environmental Impact Report for Vineyard Wind and I conclude that this project should be allowed to proceed. There are environmental impacts on wildlife, but these are mostly temporary, unavoidable impacts during construction. Any impacts are either labeled as negligible or minor.	Thank you for your comment.
0073-002	We all need more renewable energy projects and this will be a valuable asset for our energy options on Cape Cod and in Massachusetts.	Thank you for your comment.
0073-003	The benefits completely outweigh the possible impacts on wildlife and fisheries.	Thank you for your comment.
0074-001	Vineyard Wind's proposed 800 MW offshore wind farm is an example of a responsibly-sited renewable energy project. As demonstrated by the draft Environmental Impact Statement (DEIS), the company has taken steps to minimize potential negative impacts to the environment and local communities. Vineyard Wind has also invested significant time and resources in local community outreach and education efforts and is a local company with strong ties to the region.	Thank you for your comment.
0074-002	From a climate change perspective, Vineyard Wind's project will avoid approximately 1.6 million tons of CO ₂ pollution annually. This is equivalent to removing 3250,000 off the road. Perhaps more important than the project's direct pollution reductions, however, is the role Vineyard Wind's project will play in launching the country's offshore wind industry. As the first commercial-scale offshore wind farm in the US, this project will set the standard for future projects and represents a significant milestone in the transition to a renewable energy future.	Thank you for your comment.
0074-003	The success of Vineyard Wind's project is critical in light of recent news of rising climate change causing pollution and rapidly warming oceans. In 2018, after	Thank you for your comment.

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	three years of decline, CO 2 pollution increased in the US by more than 3%. A large portion of the pollution increase came from the power sector, where natural gas met most of the increase in electricity demand. This unfortunate development underscores the need to do more and move faster to support renewable energy and energy efficiency. Given what’s at stake, if we fail to rapidly reduce pollution in the coming years, the federal government must take immediate steps to reduce our dependence on fossil fuels.	
0075-001	I am all for clean energy with one caveat. As I read this plan which seems well suited to human need and responsive to environmental standards and expectations, I cannot help but notice how everything is put in terms of human well being, including the “economic value of the fish stock” which will only be temporarily disturbed. Have these creatures only economic value to we humans who squander the beauty and vast diversity of our home, Earth? We will continue to use electricity from this project at an as needs rate, which means we will consider our needs for home wi-fi service in every room, warmth, food, coziness, and feathered nests to the extent we can afford. How many people are even aware of the watts used per hour for their tv?	Thank you for your comment.
0075-002	As you progress I implore you to put out the educational materials to inform that the oceans are alive, and we with our garbage and pollution are killing them. If this project increases the awareness that the living ocean and its magnificent creatures are there for our use, then it will be an abject failure no matter how many kilowatts it saves to keep us humans in our preferred lifestyles. Educate our stewardship mandate, and our capacity to learn of that which we so unthinkingly destroy, and this project will be a success.	Thank you for your comment.
0075-003	Of course, it is up to all of us, but I’m not sure that you have addressed the sanctity of the ocean’s life whose disruption is necessitated by the ruthless recklessness with which we humans consume our magical planet. I wish you would.	Thank you for your comment.
0076-001	As explained in this letter, the DEIS fails to satisfy the analytical and public disclosure requirements of the National Environmental Policy Act (NEPA), including but not limited to its “hard look” mandate. Some deficiencies are systemic and pervade the entire document. For example, the DEIS does not clearly identify the significance thresholds that apply to each impact; nor does the DEIS explain or demonstrate how a particular impact compares to the significance threshold in question. In most cases, the DEIS simply declares that an impact is “negligible” or “minor” or “moderate” without (a) explaining what those terms mean in the context of the impact in question or (b) describing the analytical path by which BOEM determined that the description used – negligible, minor, moderate, or major – actually applies to the impact.	Section 3.1 of the DEIS included a four-level classification scheme to characterize the potential impacts of the Proposed Action and the action alternatives. The FEIS was revised to clarify the use of the impact levels applied to the adverse and beneficial impacts assessed in the document. The resource-specific sections in Chapter 3 and Appendix A of the FEIS have been updated to provide additional information related to the magnitude, duration, geographic extent, and/or frequency of potential impacts, as appropriate, to support impact determinations.

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0076-002	We also noticed that many of the most important impact evaluations are not actually set forth in the DEIS but instead are contained in extrinsic documents, such as the Biological Assessment that BOEM and Vineyard Wind prepared for the National Marine Fisheries Service pursuant to the federal Endangered Species Act (ESA). NEPA requires that the required analyses be provided in the DEIS, not other documents prepared to meet the demands of other statutes. Members of the public should not be required to track down and read non-NEPA documents. The whole purpose of the EIS is to provide the public with a single source for learning about the proposed project and its impacts. This purpose is defeated if the heart of the environmental impact analysis is contained not in the EIS but in other documents that the reader must search out and digest.	Pursuant to 40 CFR § 1502.21 agencies shall incorporate material into an EIS by reference when the effect will be to cut down on bulk without impeding agency and public review of the action. The incorporated material shall be cited in the EIS and its content briefly described, and the material must be reasonably available for inspection by potentially interested persons within the time allowed for comment.
0076-003	The Vineyard Wind DEIS does not satisfy NEPA’s minimum analytical or disclosure requirements; nor does it provide a legally adequate discussion of mitigation measures or alternatives.	BOEM’s public involvement procedures, as well as the EIS, comply with the procedural and substantive requirements of NEPA.
0076-004	NEPA mandates that the DEIS explain the “purpose and need” of the proposed wind energy project. The DEIS, however, includes no such explanation. It merely cites the Executive Order that encourages the development of renewable energy sources. (p. 1-3.) That’s not enough. There should be data demonstrating that this part of New England experiences energy shortages or that the wind energy from the proposed project will displace dirtier forms of energy generation, such as the burning of fuel oil. The EIS contains no information of this kind. The DEIS claims that the project “is designed to serve demand for renewable energy in New England” (p.1-1), but provides no evidence to support this assertion. To the contrary, there is no demonstrable need for the wind farm or the energy it will generate. Instead, Vineyard Wind will likely attempt to market the energy, either to other states further removed from New England or to New England cities who are hoping to reduce their energy costs. The effect of this process is not to reduce energy consumption and carbon emissions, but to encourage more growth and more energy use. The actual amount of greenhouse gas emissions goes up, not down. The only real change is that the windmill operators get rich at the expense of the environment.	The purpose and need statement in the EIS is compliant with NEPA regulations, which provide that the purpose and need “statement shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action” 40 CFR § 1502.13. Concerning New England energy needs, please refer to An Act Relative to Energy Diversity (H.4568), which seeks to have a commitment to reducing energy costs while strengthening the state’s clean energy economy as well as progressing towards the Commonwealth’s greenhouse gas reduction requirements. H.4568 requires utilities to competitively solicit and contract for approximately 1,200 megawatts (MW) of clean energy generation.
0076-005	The DEIS claims that the project “is designed to serve demand for renewable energy in New England” (p.1-1), but provides no evidence to support this assertion. To the contrary, there is no demonstrable need for the wind farm or the energy it will generate. Instead, Vineyard Wind will likely attempt to market the energy, either to other states further removed from New England or to New England cities who are hoping to reduce their energy costs. The effect of this process is not to reduce energy consumption and carbon emissions, but to encourage more growth and more energy use. The actual amount of greenhouse	The purpose and need statement in the EIS is compliant with NEPA regulations, which provide that the purpose and need “statement shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action” 40 CFR § 1502.13. Concerning New England energy needs, please refer to An Act Relative to Energy Diversity (H.4568), which seeks to have a commitment to reducing energy costs while strengthening the state’s clean energy economy as well as progressing towards the Commonwealth’s greenhouse gas reduction requirements. H.4568 requires

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	gas emissions goes up, not down. The only real change is that the windmill operators get rich at the expense of the environment.	utilities to competitively solicit and contract for approximately 1,200 megawatts (MW) of clean energy generation.
0076-006	[W]ind energy projects – this one included – do not reduce energy consumption. Rather, they tend to encourage growth through the generation of surplus energy, for which demand must be found. Because the energy is advertised as “clean” and “cheap”, it is often cited by those who wish to build more houses and bring more business to the area serviced by the project. This, in turn, eats up the newly-generated energy while attracting more cars and generating related secondary effects, all of which consume energy and increase carbon emissions. The DEIS, however, fails to disclose or analyze these project-related impacts.	Thank you for your comment.
0076-007	This DEIS... does not discuss a reasonable range of alternatives. To the contrary, all of the so-called alternatives involve between 85 and 100 windmills, all in the same location off the southwestern coast of Nantucket. The alternatives only differ in terms of where the on-shore substation and related infrastructure would be located, which is a fairly inconsequential matter.	Section C.5 in Appendix C of the FEIS has been revised regarding alternatives considered and not analyzed in detail. Further, note that the reasonable range of alternatives for an EIS prepared in response to an applicant proposal needs to be determined in the context of said proposal, and would not include all possible alternatives that could substitute the proposal under consideration (e.g., proposal is for a wind energy project, then a reasonable alternative cannot be to require the applicant to build a solar energy project).
0076-008	We... request that BOEM and the project applicant revise the DEIS to include and examine: (i) an alternative that would construct the wind farm/wind turbine array in a location that would not be visible from the coast of Nantucket or any other vantage point where it might interfere with existing public views, including those historically incorporated into American Indian ceremonies; (ii) an alternative that would construct the wind farm/wind turbine array in a location outside the known habitat areas of federal and/or state-listed species; and (iii) an alternative that would reduce the number of wind turbines to less than 50 (without increasing size or height of the structures).	Section C.5 in Appendix C of the FEIS has been revised for an updated discussion of Alternatives Considered but not Analyzed in Detail for the proposed Project.
0076-009	The key to conducting a proper cumulative analysis is making sure the DEIS considers all projects with a potential to contribute to the impact in question. The Vineyard Wind DEIS fails this fundamental test, as its cumulative impact analysis does not account for impacts from the other two wind projects that are likely to go in next door to it – Bay State Wind and Deepwater Wind. These projects, when combined with Vineyard Wind, take up hundreds of square miles of ocean and cause significant impacts on everything from noise to aesthetics. This situation only worsens when one considers the other wind farm leasing areas located to the immediate southeast of Vineyard Wind. (See Figure 2.1-3, on p. 2-9.) The EIS, however, does not attempt to analyze the combined or cumulative effects of these foreseeable projects.	BOEM prepared a SEIS that included an expanded planned action analysis, which described the methodology in Chapter 1 and the list of projects considered in Appendix A of the SEIS. Potential impacts are considered as described in Appendix A and in individual resource sections. BOEM has revised the list of reasonably foreseeable future offshore wind projects based on project progress since publication of the DEIS.
0076-010	The Vineyard DEIS employs virtually no established or discernable significance thresholds for any of the impact assessments, so there is really no way to	Section 3.1 of the DEIS included a four-level classification scheme to characterize the potential impacts of the Proposed Action and the action

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	determine if a given effect is or is not going to be a problem. Instead, the DEIS simply makes the conclusory statement that the impact in question is “negligible” or “minor” or “moderate” – terms that are virtually meaningless because they do not relate to any established standard.	alternatives. The FEIS was revised to clarify the use of the impact levels applied to the adverse and beneficial impacts assessed in the document. The resource-specific sections in Chapter 3 and Appendix A of the FEIS have been updated to provide additional information related to the magnitude, duration, geographic extent, and/or frequency of potential impacts, as appropriate, to support impact determinations.
0076-011	Figure 3.4.4-1 of the EIS (p. 3-154) shows that the Vineyard windfarm will be visible from all vantage points along Nantucket’s western coast, from Smith’s Point and Madaket to Tom Never’s Pond and Siasconset. The EIS, however, does not analyze this impact in terms of its everyday effect on the residents of Nantucket. Instead, the EIS addresses the impact solely in terms of its potential to discourage tourism on the island, which is a completely different (and less important) subject. This defect in the document must be rectified.	Section 3.9.2 of the FEIS has been updated to address visibility from residences and impact on residents from the proposed Project. In addition, Section 3.6.2 of the FEIS includes the material on impacts on residential property values.
0076-012	The DEIS concludes that the project’s visual effects on Nantucket would be “minor.” This conclusion, however, is devoid of analytical or evidentiary support.	Sections 3.9.1 and 3.9.2 of the FEIS have been updated to address components of Nantucket character and the visual impacts, respectively.
0076-013	The DEIS provides only summary information regarding the Project’s construction-related emissions. It does not identify each emission source or disclose the quantity of each NAAQS air pollutant that will be emitted (e.g., NOx, CO, PM10). In addition, the DEIS states that “BOEM anticipates minor air quality impacts” from project construction and installation, but the DEIS provides no data to support that conclusion.	Section A.8.1.2 of the FEIS has been clarified to include information on emissions associated NOx, CO, PM ₁₀ and incorporates by reference Vineyard Wind’s COP, Volume III, Appendix B, Tables 4-4 and 4-5. The FEIS has been updated to include additional quantitative analyses as well, including an analysis using EPA’s AVERT and COBRA tools to assess air quality and health benefits. Vineyard Wind is required to have and is applying for an OCS air permit with the EPA which includes Prevention of Significant Deterioration (PSD). Other future offshore wind projects will require similar permitting and will require compliance with the Clean Air Act.
0076-014	The DEIS also fails to disclose they types and amounts of greenhouse gases the Project will emit during the construction phase, the length of which is described in vague, uncertain terms.	Section A.8.1.2 of the FEIS includes information on emissions and incorporates by reference Vineyard Wind’s COP.
0076-015	The DEIS indicates that the Project will use approximately 400,000 gallons of oil each year (4,000 gallons for each of the 100 wind turbines). The DEIS, however, does not analyze whether and to what extent the windmills’ use of the oil (and diesel fuel) will result in air emissions.	Section A.8.1.2 of the FEIS has been clarified to include information on emissions and incorporates by reference Vineyard Wind’s COP.
0076-016	While the EIS acknowledges that migratory birds may be injured if they fly into the blades of the windmills, the DEIS indicates that recent studies of offshore wind farms found there were fewer bird strikes than expected. According to these studies, birds will fly around the wind farm rather than try to navigate through the array of spinning windblades. This means, however, that the birds must give up access to all foraging opportunities within the interior of the windmill array, and that habitat loss can be hundreds of square miles in size. Given that most migratory birds in the project area eat fish (e.g., topsmelt, anchovies, sardines,	Section A.8.3 in Appendix A of the FEIS has been updated to include a discussion on foraging and potential for loss of bird habitat.

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	and other small fish that swim near the surface), the loss of this foraging habitat means the birds must expend more energy flying to other areas to look for food. The EIS, however, does not disclose or analyze this impact on either an individual project or cumulative basis.	
0076-017	The Vineyard Wind project would place 100 windmills in the travel corridor of North Atlantic Right Whales (NARWs), among other species. Each windmill is attached to a tube 30 feet in diameter that rises from the seafloor and then extends the full length of the water column, up to and beyond the surface of the water. The other wind projects – Bay State and Deepwater – would triple the number of metal windmill stems in the water. There is no question that all of these new hard surfaces will make it difficult for whales to use echolocation in or near the windmill array, which means they will be unable to communicate in this area or navigate effectively. It may even cause whales to become lost in the windmill array. The DEIS, however, never addresses this issue. In fact, it does not discuss echolocation at all, other than to state that whales use it.	Section 3.4.2 of the FEIS has been revised to include a discussion of the effects of vertical structures on whale echolocation.
0076-018	Note that NARWs are protected under the federal Endangered Species Act and the Massachusetts Endangered Species Act. The project’s impacts on these listed species are, by definition, significant and require mitigation; yet the DEIS describes the impacts as “minor” and offers neither mitigation nor an alternatives capable of avoiding or reducing them.	Section 3.4.2 of the FEIS has been revised in coordination with NMFS and includes a discussion of impacts on marine mammals, including the North Atlantic right whale. Furthermore, Section 3.4 and Appendix D of the FEIS include the draft Incidental Harassment Authorization measures proposed to be issued under the MMPA as well as other mitigation and monitoring measures relative to the North Atlantic right whale. Further details regarding acoustic effects to these species are provided in Appendix F of the FEIS and in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ .
0076-019	The DEIS spends considerable space evaluating the project’s construction-related noise impacts (mostly from pile driving and transport vessels) on whales, but this analysis focuses almost exclusively on noise levels capable of causing physical injury or death to the animal. The DEIS does not really address sub-lethal or sub-injurious noise levels and how they affect whale behavior. Because the sound pressure required to injure or kill a whale is substantially higher than the sound pressure needed to disrupt whale communication or navigation, the DEIS analysis is skewed to the higher end of the noise scale. Not surprisingly, the DEIS determines that the project’s noise impacts are unlikely to injure or kill whales... The real issue is whether the noise from constructing and operating the windmills has the potential to interfere with key aspects of whale behavior, such that whales will have to avoid this area of the ocean – an area which has historically supported whale birthing and rearing. The DEIS does not address this potential impact. Again, the whale species affected by the project’s noise impacts are federally-listed as endangered. Thus, the impacts are, by definition, significant and require mitigation. The DEIS, however, does not characterize the impact as	Section 3.4.2 of the FEIS has been revised in coordination with NMFS and includes a discussion of acoustic impacts on marine mammals. Furthermore, Section 3.4 and Appendix D of the FEIS include the draft Incidental Harassment Authorization measures proposed to be issued under the MMPA. Further details regarding acoustic effects to these species are provided in Appendix F of the FEIS and in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ .

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	significant and also fails to offer mitigation or alternatives to avoid or reduce the impact.	
0076-020	During the years-long construction phase of the project, vessels of various size will be traveling to and from the windmill array zone. Studies show that in the coastal waters off Massachusetts, vessel collisions with whales are increasingly common, especially when the vessel in question travels in excess of 10 knots per hour. The DEIS claims that vessels associated with construction of the project will be slow-moving and thus unlikely to collide with whales. The evidence, however, is to the contrary. It appears that most of the vessels to be used in the construction of the Vineyard Wind project will travel anywhere between 10 and 20 knots per hour – more than fast enough to cause whale strikes. (See p. 3-99.) The whale species affected by the project’s potential for vessel-to-sea mammal collisions are federally-listed as endangered. Thus, these impacts are, by definition, significant and require mitigation. The DEIS, however, does not characterize the impacts as significant and also fails to offer mitigation or alternatives to avoid or reduce the impacts.	Section 3.4.2 of the FEIS has been revised in coordination with NMFS and includes the proposed mitigation and monitoring measures for marine mammals. Furthermore, Section 3.4 and Appendix D of the FEIS include the draft Incidental Harassment Authorization measures proposed to be issued under the MMPA. Pre- and post-construction monitoring plans, if required, will be developed in coordination with the NMFS as part of the ESA Section 7 consultation.
0076-021	On page 3-90, the DEIS describes the current status of the North Atlantic Right Whale (NARW) – a federally-listed endangered species. The data are both depressing and alarming. Not only has NARW mortality spiked since 2017, the “reproductive output for the species has declined by 40 percent since 2010 (Kraus et al. 2016a).” (p. 3-90.) In addition, for the first time since aerial surveys began in 1989, no new NARW calves were documented in their calving grounds. (Id.) As the DEIS acknowledges, “[t]his combination of factors threatens the very survival of this species (Pettis et al. 2017).” (Id.) Despite these findings, and despite the clear evidence that the proposed Project – during construction and operation – will adversely affect NARWs, the DEIS concludes that the Project’s impacts on the species will be “minor” with Vineyard Wind’s “self-imposed” measures. (p. 3-102.) These measures, however, are not well-described and are not linked to each of the identified impacts on the species. Thus, there is no way to ascertain whether they will or will not reduce impacts on NARW to such a degree as to render the impacts less than significant (or minor). Simply put, the conclusion drawn on page 3-102 regarding impacts to NARW cannot be squared with the available data.	Section 3.4.2 of the FEIS has been revised in coordination with NMFS and includes a discussion of impacts on marine mammals, including the North Atlantic right whale. Furthermore, Section 3.4 and Appendix D of the FEIS include the draft Incidental Harassment Authorization measures proposed to be issued under the MMPA. Section 3.4.2 of the FEIS has been updated with further details regarding acoustic effects to these species are provided in Appendix F of the FEIS and in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ .
0076-022	The DEIS includes two tables – Table 3.3.7-4 (PTS Onset Acoustic Threshold Levels) and Table 3.3.7-5 (Behavioral Exposure Criteria) – that purport to show how much noise certain whales and other marine mammals can withstand before suffering injury or altering their behavior. These tables include a great deal of complex, technical information that no one but an acoustical engineer would understand unless it was sufficient explained. Unfortunately, the DEIS makes no	Section 3.4.2 of the FEIS has been revised in coordination with NMFS and includes a discussion of impacts on marine mammals. Further details regarding acoustic effects to these species are provided in Appendix F of the FEIS and in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ .

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	<p>effort to break down the tables and explain what they mean. For example, the first table is supposed to show the amount of noise associated with a “permanent threshold shift” (PTS), a term the DEIS never defines. It is not even clear whether the two tables are meant to reflect the Project’s anticipated noise impacts on marine mammals or to provide basic information on the sound levels that generally cause injury or behavioral changes in whales and porpoises.</p>	
0076-023	<p>Table 3.3.7-6 and Table 3.3.7-7 show that the Project’s construction noise under Scenario 2 (inexplicably, the DEIS does not discuss Scenario 1 or any other scenario) would injure a certain number of NARWs and other federally-listed whales (Fin Whale and Sei Whale) during each day of pile installation. According to the DEIS, the Project will require 102 pile installation days, which means that over the course of Project construction, large numbers of NARWs, Fin Whales and Sei Whales will be injured or otherwise adversely affected by pile-installation noise. This is a significant (major) impact and the DEIS should describe it as such. Instead, however, the DEIS states that “Vineyard Wind’s self-imposed measures of utilizing soft start, Protected Species Observers, and passive acoustic monitoring would reduce the potential impacts to marine mammals” to a minor or moderate risk. Yet, the DEIS does not demonstrate how these particular measures will actually prevent or reduce the identified noise impacts on whales, especially the NARW, which, as explained above, is suffering sharp and significant declines in population and reproductive resilience.</p>	<p>Section 3.4.2 of the FEIS has been revised in coordination with NMFS and includes a discussion of impacts on marine mammals. Further details regarding acoustic effects to these species are provided in Appendix F of the FEIS and in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/.</p>
0076-024	<p>The DEIS claims that Vineyard Wind will implement “self-imposed” mitigation measures, including “soft start” construction approaches. According to the DEIS, these soft start measures will reduce construction-related impacts on fish and marine mammals. The document, however, provides no evidence to support this claim.</p>	<p>Section 3.4.2 of the FEIS has been revised in coordination with NMFS and includes a discussion of impacts on marine mammals. Further details regarding acoustic effects to these species are provided in Appendix F of the FEIS and in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/.</p>
0076-025	<p>The DEIS states that reported sound levels of operational wind turbines is low, implying that such levels will not affect whales and other marine mammals. This conclusion, however, cannot be squared with the results of a 2013 study conducted by Scottish scientists, titled “Modelling of Noise Effects of Operational Offshore Wind Turbines including noise transmission through various foundation types” (Marmo, B., Roberts, I., Buckingham, M.P. King, S., Booth, C. (2013).) That study determined that the operational noise levels of the wind turbines would be audible to marine mammals, especially when the turbines are producing maximum power. In addition, the study concluded that “species with hearing specialized to low frequency may be able to detect the wind farm from at least 18 km away” (Marmo, et al., pp. 57-58.) BOEM must consult the Marmo, et al. study and determine if its results alter the conclusions drawn in the</p>	<p>Section 3.4.2 of the FEIS has been revised in coordination with NMFS and includes a discussion of impacts on marine mammals. Further details regarding acoustic effects to these species are provided in Appendix F of the FEIS and in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/. The study by Marmo et al. referenced by the commenter estimated that a behavioral response is likely only at sound intensities greater than or equal to 120 dB re 1 μPa. Operational noise of that intensity is expected only in a small area around each turbine, probably closer than 50 meters (164 feet).</p>

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	DEIS relative to the project’s operational noise impacts on NARW and other marine mammals.	
0076-026	...[S]ea turtles navigate by interfacing with electromagnetic fields (EMFs) under the ocean’s surface. Recent monitoring studies show that sea turtles in New England now become stranded in greater numbers and with greater frequency than any time in history. According to some scientists, the sharp rise in sea turtle strandings is due to EMF interference from man-made objects, especially those that create their own EMFs. Simply put, the proliferation of EMFs jams up the sea turtles’ navigation system; the turtles lose their way, and then they become stranded and die. In the case of off-shore windmill projects, energy transmission cables connect each windmill to an on-shore relay station. Those transmission cables are buried just a few feet under the seabed and emit electromagnetic signals, the very thing that can disrupt sea turtle navigation. The DEIS, however, does not disclose or analyze this impact.	To minimize EMF generated by cables, all cabling would be contained in grounded metallic shielding to prevent detectable direct electric fields. Vineyard Wind would also bury cables to a target burial depth of approximately 6.6 feet (2 meters) below the surface. Section 3.5.2 of the FEIS has been updated to include additional information on EMF-related impacts on sea turtles. Further discussion of EMF-related impacts on these species is also provided in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ .
0076-027	Note that three turtle species affected by the project – Kemp’s Ridley, Leatherback, and Loggerhead – are protected under the federal Endangered Species Act. The project’s impacts on these listed species are, by definition, significant and require mitigation; yet the DEIS describes the impacts as “minor” and offers neither mitigation nor an alternative capable of avoiding or reducing those impacts.	Section 3.5.2 of the FEIS includes a discussion of impacts on listed sea turtles. Furthermore, Appendix D of the FEIS includes a comprehensive list of the monitoring and mitigation that has been proposed for the agency-preferred alternative. Further discussion of impacts on these species is provided in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ .
0076-028	The windmills must be fastened to the bottom of the ocean, which means a concrete-type platform must first be implanted in the seafloor. These platforms necessarily require removal of the soft seabed, which, in turn, will be replaced by the hardened structure of the platform. The EIS contends this is a biological benefit, in that the concrete platforms will function as a kind of artificial reef that will attract fish. This, however, is not the issue. The EIS is supposed to analyze what is lost by virtue of damaging and covering up the soft seabed habitat and the benthic organisms that live there. These are the naturally occurring flora and fauna on which the entire ecosystem in Muskeget Channel is based. Yet, the EIS dismisses this impact entirely.	Section 3.3.5 of the DEIS described the impact of permanent habitat conversion as moderate [negative] impact. The creation of new hard-bottom habitat is a beneficial result, but does not reduce the level of impact on soft-bottom communities. The revised FEIS Section 3.2 discusses how the loss of soft-bottom habitat may be adverse. Chapter 2 of the DEIS explained that the installation of the foundations would be through pile driving and scour protection added around each foundation, not concrete gravity foundations.
0076-029	On page 3-32, the DEIS provides a bullet-point list of six project-related impacts on birds and then claims that “Section 3.3.2.2 includes a detailed discussion of these impacts.” Unfortunately, this is not the case. For example, the second bullet points relates to permanent loss of bird habitat, but Section 3.3.2.2 provides little in the way of useful information or meaningful analysis regarding this impact. All it says is that “[s]ome birds might avoid the WDA during its operation, leading to an effective loss of habitat,” and that “[l]oons, grebes, seaducks, and northern gannets typically avoid offshore wind developments, resulting in loss of habitat and reduced risk of collision.” (p.3-36.)	Section A.8.3 in Appendix A of the FEIS has an updated discussion on foraging and potential for loss of bird habitat.

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0076-030	This begs the following two questions: What other bird species will avoid the windmill array and thereby lose important forage habitat? And, among the birds that will not avoid the windmill array, how many – and of which species – will potentially collide with the windmills? The DEIS does not answer either question. Nor does it quantify how much habitat will be lost to those birds that do avoid the project area. Based on the DEIS’s lack of key information and substandard analysis, there is no support for the conclusion that the Project’s impacts on bird habitat will be “negligible.”	Section A.8.3 in Appendix A of the FEIS has an updated discussion on potential for collision as well as a discussion of the amount of suitable habitat no longer available to species that are expected to avoid operating WTGs. A complete list of species that are considered to be highly susceptible to either collision or displacement is provide in Robinson Willmott et al (2013), which is incorporated by reference into the FEIS.
0076-031	The DEIS acknowledges that the “rotating blades of WTGs could injure or kill birds that pass too near.” (p. 3-36.) But then the DEIS states that the “magnitude of this impact is difficult to estimate, and it differs across species.” (Id.) This is not a NEPA analysis; it’s a cop-out. The law requires that the DEIS (i) identify the bird species that could injured or killed by the rotating blades of the WTGs, and (ii) determine through scientific analysis how many are likely to be harmed in this particular case – both on a project-specific and cumulative basis. Further, the DEIS must assess whether the project has the potential to affect any listed bird species, even if the number of affected listed birds is small when compared to more common bird species. Based on the absence of information and the DEIS’s weak analysis, there is no support for the DEIS’s conclusion that the Project’s bird collision impacts would be “minor.”	Section A.8.3 in Appendix A of the FEIS has an updated discussion of the species most susceptible collision with operating WTGs. A complete list of species highly susceptible to collisions is provided in Robinson Willmott et al (2013), which is incorporated by reference into the FEIS. It is impossible to quantify the number of birds, if any, that will have fatal interactions with operating WTGs. The Biological Assessment submitted to USFWS (located at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/) addressed impact on federally listed species and included modeling of the estimated number of individuals that may be killed by operating WTGs.
0076-032	DEIS Figure 3.3.2-1, titled “Total Avian Relative Abundance Distribution Map for the Higher Collision Sensitivity Species Group,” lacks critical information and is misleading. First, it does not identify which birds fall within the “higher collision sensitivity species group”; nor does it describe the criteria used to define these birds as “higher collision sensitive”. Second, it also fails to explain what differentiates “high” collision sensitivity from “low” collision sensitivity. Third, the figure itself suggests that no birds at all fly over or near the proposed Project. There is simply no support for such a characterization. Worse, the figure falsely suggests to the reader that no birds are currently using the project area and thus no birds are likely to be affected by the project. These are not accurate claims. Figure 3.3.2-2, titled “Total Avian Relative Abundance Distribution Map for the Higher Displacement Sensitivity Species Group,” suffers the same defects. Given the deficiencies of these two figures, they cannot be used to support any analytical conclusion set forth in the DEIS.	Section A.8.3 in Appendix A of the FEIS has an updated discussion on potential for collision and displacement. In addition, refer to Figure A.8.3-2 and Figure A.8.3-3 (formerly 3.3.2-1 and 3.3.2-2) in Appendix A of the FEIS that depict modeled use of the offshore portion of the proposed Project area by bird species with high collision sensitivity and high displacement sensitivity, respectively, which depict the expected distribution of birds in these groups relative to the proposed Project area. Complete lists of species highly susceptible to collision and displacement, as well as definitions of high, medium, and low risk for these effects are provided in Robinson Willmott et al. (2013), which is incorporated by reference into the FEIS.
0076-033	According to the DEIS, three federally listed bird species – the Roseate Tern, the Piping Plover, and the Rufa subspecies of the Red Knot – may occur within the Project area and thus be subject to project-related impacts. (p. 3-32.) The DEIS, however, does not analyze the project’s operational or cumulative effects on these particular species, even though they are protected by federal law and may not be taken, even incidentally, without authorization under the Endangered	Section A.8.3 of the FEIS has an updated discussion on listed species status and expected effect determination relative to these species. A detailed discussion of federally listed species and designated Critical Habitat is provide in the Biological Assessment submitted to USFWS (located at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/). The Biological Assessment includes an analysis of potential effects for each of these

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	Species Act. The DEIS also fails to disclose whether and to what extent the project intrudes upon or would affect designated critical habitat for these listed bird species.	species as well as modeling of the potential for fatal interactions with operating WTGs. The Biological Assessment is currently being reviewed by the USFWS and the findings will be incorporated into the Record of Decision.
0076-034	On page 3-43, the DEIS indicates that the federally-listed northern long-eared bat and three state-listed bats – the eastern small-footed bat, the little brown bat, and the tri-colored bat – are known to occur in the project area and thus could be affected by the Project. The DEIS, however, does not analyze the Project’s operational or cumulative impacts on any of these particular species. To the extent such species might be affected, the impact would not be “negligible” as indicated in the DEIS (p.3-45) but significant.	Section A.8.4 in Appendix A of the FEIS has been updated to include the listed species. The Biological Assessment submitted to USFWS for listed species can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ .
0076-035	On page 3-12, the DEIS describes the water circulation process/system in and near the project area as follows: “Large-scale regional water circulation is strongest in late spring and summer. The clockwise movement around Georges Bank and flow towards the equator dominates the regional water circulation (Gulf of Maine Census 2018). The edge of the continental shelf creates a shelf-break front that encourages upwelling. Weather-driven surface currents, tidal mixing, and estuarine outflow all contribute to driving water movement through the area (Kaplan 2011).” Unfortunately, however, the DEIS does not analyze the Project’s individual and cumulative impacts on local and regional water movement. Given that there could be as many as 300-600 wind turbines in the Area of Potential Effect (APE), each with its own hardscape underwater platform, it is likely that water currents, flow rates, tidal mixing, circulation, estuarine flow, and seabed/benthic morphology will be affected by so many large structures being placed within the channel. The DEIS should have assessed this potential impact but failed to do so. Likewise, the DEIS should have assessed these impacts in terms of their secondary effects on biological resources and processes.	Appendix E of the FEIS has been updated to include additional information related to atmospheric and oceanographic effects of offshore wind facilities. Please see Sections E.2.6 and E.4.4 of Appendix E of the FEIS for a discussion on water circulation and flows near WTG foundations.
0076-036	The DEIS acknowledges that Project construction will have “moderate” impacts on benthic organisms, including mortality, damage, and displacement of invertebrate organisms, which are the trophic base for the marine ecosystem. (p. 3-62.) The DEIS, however, fails to propose any mitigation for this impact. Instead, the DEIS simply declares that the impact is “unavoidable” without demonstrating that BOEM has investigated whether and how such impacts could be reduced. NEPA demands more, and for that reason the DEIS is inadequate as a matter of law. And although the DEIS indicates that the project applicant may “monitor” benthic conditions during and after construction, monitoring alone – i.e., without corrective action – is not mitigation.	Section 3.2 of the FEIS has been updated to include monitoring initiatives to ensure documentation of potential effects on benthic resources. Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. Additional mitigation and monitoring measures may arise from consultations and coordination with Federal and State resource agencies. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0076-037	In its discussion of the Project’s construction impacts on fish habitat, the DEIS includes the following sentence that is both internally inconsistent and confusing:	Section 3.2.2 of the FEIS clarifies the duration of habit impacts and the area affected compared to the WDA as a whole. An individual displaced from its

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	<p>“Because the long-term habitat alteration would be temporary and would encompass a proportionally small area, these impacts are unlikely to have major impacts on populations in the WDA footprint and displaced species would have large areas of preferred habitat available nearby.” First, as a semantic matter, it is hard to understand how an impact – in this case, habitat alteration – can be both “long-term” and “temporary” in the NEPA context. Is the DEIS suggesting that impacts which last the 30-year life of the Project are “temporary”? If so, that would be a significant departure from the way most NEPA documents define temporary impacts. Second, the reference to “proportionally small area” is hopelessly vague and meaningless. Proportional to what? The entire Atlantic Ocean? Further, it is incorrect to imply that the affected invertebrates and fish can simply move to “preferred habitat nearby.” Many of the species in question have no means to search out and locate such habitat, and the term “nearby” is also misleading given the size of the APE. For invertebrates and smaller fish that do not migrate or move far from their resident areas, moving even one or two miles is beyond their capability. None of these issues, of course, is discussed or analyzed in the DEIS, and for that reason, the document is defective.</p>	<p>preferred habitat by proposed Project activities would have to wander a maximum radial distance of approximately 85 feet (26 meters) before encountering its preferred habitat type. Section 3.3 of the FEIS acknowledges that sessile or less mobile species and life stages that are unable to escape construction areas would be subject to greater mortality.</p>
0076-038	<p>The DEIS admits that project construction will affect benthic fish such as winter flounder, American lobster, and monkfish, and may result in egg loss and reduced fish recruitment. Nevertheless, the document concludes that “this would be limited and BOEM does not anticipate impacts on the flounder stock.” The DEIS, however, provides no evidence to support this bare conclusion. The only reference is to the Cape Wind EIS which estimated that seabed scars from jet plow cable installation would recover in 1 to 38 days. (p. 3-76.) But this has no bearing on impacts on flounder; moreover it is an estimate – an expectation – that has not been substantiated by field research or monitoring.</p>	<p>The revised FEIS does not model potential effects on any individual stock, because an assessment of species-specific or stock-specific effects is outside of the scope of this document. However, Section 3.3 of the FEIS predicts that proposed Project activities would be unlikely to have lasting impacts on a population level. Section 3.3 of the FEIS incorporates the EFH Assessment by reference. Sections C.1.2.2.1, C.1.2.5, and C.1.2.6 in Appendix C of the FEIS include a discussion on NMFS coordination and consultation as part of the EIS. The EFH Assessment has been incorporated by reference and summarized in the EIS. The EFH Assessment can be found on at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/.</p>
0076-039	<p>The DEIS also refers to an EFH (Essential Fish Habitat) Assessment that was prepared for this Project. Unfortunately, the DEIS does not provide the results of the EFH Assessment, so one is left to guess as to the significance of the Project’s impacts on EFH. Worse, although the DEIS describes the impacts on EFH as moderate (whatever that means in this context), it offers no mitigation to avoid or reduce those impacts.</p>	<p>Section 3.3 of the FEIS incorporates the EFH Assessment by reference. Sections C.1.2.2.1, C.1.2.5, and C.1.2.6 in Appendix C of the FEIS include a discussion on NMFS coordination and consultation as part of the EIS. The EFH Assessment has been incorporated by reference and summarized in the EIS. The EFH Assessment can be found on at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/.</p>
0076-040	<p>[T]he DEIS, when discussing habitat impacts, states that “BOEM does not anticipate impacts on flounder stock.” (pp. 3-75—3-76.) Yet, under the subheading “Water Withdrawal,” the DEIS includes the following statement which suggests a very different conclusion: “Due to the surface-oriented intake for the jet plow, water withdrawal could entrain eggs and larvae of pelagic finfish and invertebrates, resulting in 100 percent mortality (MMS 2009). Jet plowing would impact species with pelagic eggs or larvae, including numerous flatfish</p>	<p>Section 3.3.2 of the FEIS has been updated to discuss impacts of water withdrawal. Section 2.4 of the FEIS has been updated to summarize the impacts of the proposed Project on each resource type. Predicting the overall impact of the proposed Project to a finer degree than the impact definitions given in Section 3.0 (Tables 3-1 and 3-2 in Appendix B) of the FEIS is beyond the scope of a typical NEPA analysis.</p>

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	<p>species (e.g., windowpane flounder, winter flounder, witch flounder, [Glyptocephalus cynoglossus], yellowtail flounder and summer flounder), important commercial groundfish species (e.g., Atlantic cod, haddock, Pollock), and other recreationally and commercially important species (e.g. monkfish, Atlantic herring, Atlantic mackerel, silver hake, butterfish).” (pp. 3-76—3-77.) These two statements, at least as to flounder, cannot be reconciled. That is, the project cannot cause 100 percent mortality of flounder eggs and not impact the fish species. Worse, it appears that the DEIS, in order to downplay the Project’s overall construction impacts on these fish, is dicing up the impacts into subcategories (e.g., impacts from habitat alteration, impacts from sedimentation, impacts from turbidity, impacts from water withdrawal, impacts from pile driving) without ever combining them. This allows BOEM to underreport the true construction-related impacts on these fish and mischaracterize them as minor or moderate, when in fact they are significant and require mitigation.</p>	
0076-041	<p>The DEIS includes a table, titled “Radial Distance (meters) to Thresholds for Fish from Impact Hammering” (Table 3.3.6-1), which purports to “present the radial distance for injury for [sic] fish hearing categories at 6 decibels (dB) attenuation.” The table, however, is indecipherable and, for that reason, meaningless. Even if one could discern from the table the distances at which certain fish would be affected by the Project’s pile driving noise, neither the table nor the DEIS explains the data in terms of impact significance. As a result, the critical analytical piece remains missing.</p>	<p>Section 3.3.6 of the FEIS has been updated on the discussion of potential impacts of pile-driving noise on fish, and Table 3.3-2 in Appendix B of the FEIS has been updated to include the distance (meters) to thresholds in each simulation.</p>
0076-042	<p>The DEIS states that “BOEM expects minor impacts from pile driving, as it would occur sporadically, the actual area of impacts would be small to the overall habitat available, and pile-driving noise would only occur over a relatively short period of time.” (p. 3-78.) This sentence contains no real information or analysis. The DEIS does not explain what “sporadically” means in this context or why the sporadic nature of the pile driving would reduce impacts to less than significant levels. BOEM and/or Vineyard Wind should know how often pile-driving will occur at the project; so there should be no mystery as to how frequently it will occur. The same goes for the statement that pile-driving “would only occur over a relatively short period of time.” What does “relatively short period” mean in this context? Again, the applicant and the agency should know how long pile-driving will take place at the project site.</p>	<p>Section 3.3.2 of the FEIS has been updated on the discussion of potential impacts of pile driving noise, including the frequency and duration and the habitat available in the region.</p>
0076-043	<p>[T]he DEIS indicates that the habitat area made inhospitable by pile-driving “is small in relation to the overall habitat available.” What does that mean? How much habitat is actually affected, and how is the DEIS defining “overall habitat available”? Without more definitional rigor, this statement – and there are many like it throughout the DEIS – is largely meaningless and does not provide the</p>	<p>Section 3.3.2 of the FEIS has been updated on the discussion of potential impacts from pile driving and habitat alteration, including the habitat available in the region, as defined in Section 3.3.1 of the FEIS. Section 3.3.2 of the FEIS also predicts that populations would likely recover naturally.</p>

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	information the public needs in order to assess the true effects of the project; nor does it reflect the “hard look” that NEPA demands.	
0076-044	The DEIS focuses exclusively on the potential for the Project’s noise impacts to physically injure or kill fish and other marine animals. And while injury and mortality are certainly important issues, they are not the only impacts of concern. To the contrary, any noise-related impact that alters fish behavior must be studied and disclosed, for the simple fact that changes in fish behavior tend to upset the life cycles and reproductive success of the species in question.	Section 3.3.2 of the FEIS has been updated on the discussion of acoustic impacts on fish behavior. Details regarding acoustic effects to marine mammals are provided in Appendix F of the FEIS and in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ .
0076-045	According to the DEIS, the project’s construction-related noise impacts on fish could be mitigated through a variety of monitoring efforts. Monitoring, however, is only meaningful as a mitigation measure if it is coupled with impact thresholds which, if met, trigger the need for corrective action. The DEIS, however, includes no such thresholds and does not identify any curative measures in the event monitoring identifies significant impacts.	BOEM agrees that monitoring is not necessarily mitigation, and this has been clarified in the FEIS. Section 3.3.2 of the FEIS has been updated on the discussion of potential impacts of pile driving noise and potential mitigation, including noise mitigation technologies and potential corrective action.
0076-046	On pages 3-79 and 3-80, the DEIS discusses the Project’s operational noise impacts on fish. Missing from this discussion, however, is any assessment of wind turbine noise on fish. This is a fatal omission and needs to be corrected.	Section 3.3.6.3 of the DEIS included a discussion of impacts of WTG operational noise. Therefore, no changes to the FEIS are warranted.
0076-047	The DEIS states that impacts associated with WDA and OECC decommissioning [on fish] would be similar to the construction phase, except that there would be no pile driving. The DEIS, however, provides no data on this point. And it is very likely that the type and magnitude of noise generated during decommissioning activities will be vastly different than the type and magnitude of noise generated during installation. Yet the DEIS does not explain what these differences are (or show why such differences do not exist). Nor does it disclose how long the decommissioning process will take. As a result, the DEIS provides no useful information on noise impacts from decommissioning.	Decommissioning plans and timelines were discussed in Section 2.1.1.3 of the DEIS, and effects to fish from decommissioning were described in Section 3.3.5 of the DEIS. The decommissioning approach is unchanged from the DEIS; therefore, no changes to the FEIS were necessary. Further, additional NEPA analysis will be conducted prior to making a determination on the decommissioning application that needs to be submitted for purposes of authorizing decommissioning activities, including the methods to be used.
0076-048	Like most structures that rest submerged in sea water, the stems/tubes of the proposed wind turbines will likely attract barnacles and other sea creatures that attach themselves to hard surfaces. The most common method of eliminating and/or preventing such attachment is the periodic application of anti-fouling paint. Such paint, however, contains high concentrations of copper, as that is the paint’s active ingredient. Copper, in turn, has adverse effects on eel grass and other biotic resources, including benthic flora and fauna. The DEIS, however, does not disclose whether the project owner or operator will apply anti-fouling paint; nor does the DEIS analyze the impacts of such application.	The Section 2.1.1.1 of the FEIS has been updated to discuss anti-fouling paint.
0076-049	Although the DEIS admits that “[h]eat generated by power transmission has the potential to affect water temperatures (p. 3-14), the DEIS fails to analyze whether the proposed Project will cause water temperatures to rise in or near the windmill array and/or near the proposed transmission cables. Likewise, the DEIS fails to	Sections A.8.2.1 in Appendix A and 3.2.2 of the FEIS have been updated to address heat from operating submarine cables. Appendix E of the FEIS has also been updated to include additional information related to the oceanographic and atmospheric impacts associated with offshore wind energy facilities.

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	assess whether any project-related rise in water temperature will affect biotic resources, including fish.	
0076-050	The DEIS indicates that Vineyard Wind would “be allowed to discharge untreated waste overboard.” (p. 3-15.) The DEIS, however, does not disclose the types or amounts of untreated waste that would be discharged into the water; nor does it analyze how such discharges may affect water quality or biotic resources. Although the DEIS states that the ballast water Vineyard Wind intends to discharge will be “uncontaminated,” the DEIS provides no facts to support this claim.	Section A.8.2.2 in Appendix A of the FEIS has been updated with a discussion of the types of allowable discharges from Project vessels.
0076-051	According to the DEIS, project construction will require up to 46 vessels. (It is unclear how many such vessels will be used each day.) These vessels have the potential to transport and introduce invasive species into the APE’s marine environment, especially through the discharge of ballast water. The DEIS, however, does not analyze this potential impact.	Section 1.3 of the FEIS has been revised to include an updated list of environmental permits and consultations. Section 2.1.1.1 of the FEIS has been updated to discuss ballast water management. Section A.8.2.1 in Appendix A of the FEIS has been revised to include an updated discussion of relevant regulatory requirements, including compliance with 33 CFR Part 151 Subpart D and 46 CFR 162.060.
0076-052	One of the obvious impacts of the proposed wind project is its effect on tribal viewscreens and related cultural resources in Nantucket Sound. The Vineyard EIS, however, does not really address this impact. Instead, it states that the analysis of impacts on tribal resources will take place as part of the applicant’s (and BOEM’s) NHPA Section 106 consultation with the tribes. (p. 3-145.) That consultation process has not yet taken place, so we are left with virtually no information on this critically important issue. NEPA does not allow a project applicant or a federal agency to defer analysis of such an impact, regardless of whether this same impact will be addressed in the future pursuant to some other federal law.	Section 3.8 of the FEIS has been updated to include the latest information related to the ongoing Section 106 consultation process.
0076-053	The size, scale, and location of the proposed Project necessarily alters the historical and cultural landscape for Nantucket and all of the Cape Code region – an area rich in its shipping and fishing heritage. The DEIS, however, fails to provide an adequate assessment of the Project’s impacts on that heritage.	Section 3.8 of the FEIS has been updated to include the latest information related to the ongoing Section 106 consultation process, including consultation with consulting parties in Nantucket.
0076-054	Each of the 100 windmills will require approximately 4,000 gallons of oil to operate properly – oil that must be transported to and stored within the windmills themselves. The DEIS, however, does not analyze the potential spill hazards associated with moving and storing 400,000 gallons of oil at the windmill array.	Section 2.3 of the FEIS has been revised to include a discussion of the potential for release of oil from WTGs and ESPs. Section A.8.2.2 in Appendix A of the FEIS has been updated to include additional information on the probability of a spill and the spill reaching the shoreline.
0076-055	The project area receives substantial shipping and fishing boat traffic, both day and night. The DEIS, however, fails to provide an adequate analysis of the Project’s potential to cause ships and boats to collide with the wind turbines, especially at night.	Section 3.11.2 of the FEIS has been revised to include an expanded discussion of impacts on navigation in the WDA.

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0076-056	[T]he DEIS for the Vineyard Wind project is legally deficient and does not meet the minimum analytical standards of NEPA. BOEM must... release a new draft of the document, thereby providing the public with a proper opportunity to understand and judge the Project on its true merits.	The DEIS contained a thorough analysis of the impacts expected from the Proposed Action. The analysis in the DEIS and SEIS has been further clarified and expanded where needed in the FEIS.
0077-001	...consider the new biological and environmental services which will be rendered by the Wind Energy Facility and its supporting infrastructure. The region is famous for the variability in its shoals and these often pose hazards to navigation, requiring repeated dredging. The implanting of large structures will stabilize the bottom environment and create artificial reefs, with their accompany flora, and these will cause fish populations and other benthic inhabitants to flourish...this same effect will improve the economic environment for tourist fishing and others... this same effect will increase the biodiversity of the greater Nantucket Sound, which, at present, due to the cited variability in shoals, is relatively impoverished.	Thank you for your comment.
0077-002	...it seems only right to allocate to the project its proportional share of benefit helping Massachusetts and the region contain its greenhouse gas emissions. While the pro rated portion to this project may not be high, there are cost estimates available.	Thank you for your comment.
0077-003	Adequate consideration of future sea level rise and surge events at sites of[cable] landfall should be considered in the designs. To the degree these points are not already stabilized by artificial structures, consideration should be given to the long term fluidity of beach fronts, including depositional effects downflow and upflow.	Section 2.5 of the FEIS has been included to identify the agency-preferred alternative. The landfall location would utilize HDD to transition the cable from offshore to onshore, thus avoiding the shore itself.
0078-001	...the Alliance remains concerned about future development in the Sound and is actively pursuing federal legislation to secure permanent protection for this unique body of water. This legislation allows for transmission lines in the Sound connecting to projects located outside of the Sound such as Vineyard Wind’s proposed project. But it also would designate Nantucket Sound as a National Historic Landmark and ensures that Vineyard Wind’s transmission lines or any future transmission lines in the Sound could not be used to facilitate a project whose turbines would be located within the Sound. The Alliance commends Vineyard Wind for its strong and ongoing efforts to address our concerns in this regard...The Alliance supports the planning approach used to identify Wind Energy Areas in federal waters, including the area leased to Vineyard Wind for its turbines. We also are pleased that the Alliance’s longstanding recommendations on the need for regional planning to identify the best locations for offshore wind with minimum conflict have been followed.	Thank you for your comment.
0078-002	First, BOEM should establish a requirement that prohibits Vineyard Wind from using its cable to interconnect with any project located in Nantucket Sound.	Thank you for your comment.

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	Second, BOEM should use its authority under the OCSLA and other laws to designate the Sound as an area withdrawn from OCSLA leasing and development.	
0079-001	On January 15, 2019, the 5Cs issued a public statement endorsing the Vineyard Wind project...Recent federal reports describing acceleration and increased severity of climate change underscore the need for immediate action to generate clean renewable energy...We believe the Vineyard Wind project will make major strides in advancing this goal.	Thank you for your comment.
0079-002	The waters off New England are warming at an alarming rateCape’s fishing industry will be especially impacted by warming water, which means cold water fish species will leave the area in search of cooler water or become extinct. It’s imperative that we change our energy sources to a low-carbon mix containing a significant amount of renewable energy, starting yesterday.	Thank you for your comment.
0079-003	The 5Cs board has carefully followed and been impressed by Vineyard Wind’s efforts to mitigate project impacts and address community concerns. The project, for example, has developed community agreements with municipal partners on the Vineyard and town of Barnstable, committing \$15 million for numerous initiatives which benefit Cape and Islands residents including programs to recruit, mentor and train Massachusetts workers, particularly those in southeastern Massachusetts, for careers in the new offshore wind industry.	Section 3.4.1.3 of the DEIS addressed the listing of funds to be established by Vineyard Wind. Therefore, no change to the FEIS is warranted.
0080-001	Transitioning to renewable energy is vital to decreasing carbon emissions.. by pursuing renewable energy, the United States will continue to participate in the international community’s efforts to better steward the climate. Vineyard Wind’s project will promote energy security and sustainability in New England.	Thank you for your comment.
0081-001	<p>However, since the availability of the DEIS, ongoing discussions with agencies have resulted in project changes. Comments below take into account these ongoing and continuing discussions relating to the preferred project alternative. An alternative that meets Vineyard Wind’s goal of developing an 800 megawatt offshore wind project and meets the Commonwealth’s goals of avoiding and minimizing impacts to coastal and ocean resources and uses would:</p> <ul style="list-style-type: none"> • minimize the project footprint, by using the largest available wind turbine generators (WTGs), as in Alternative E; • include one Electrical Service Platform (ESP), an alternative that is not proposed in the DEIS but has been suggested in meetings with Vineyard Wind; • use Covell’s Beach in Barnstable as a landing point for the offshore export cables, as in Alternative B; and • preserve existing transit corridors as described by Automatic Identification System (AIS) data and through consultation with interested parties. 	Section 2.5 of the FEIS has been added to include a discussion on the agency-preferred alternative that has been identified for the proposed Project. In addition, the Proposed Action as presented in the COP and the action alternatives include the use of the PDE, which allows for Vineyard Wind to use 1-2 ESPs. In addition, Chapter 2 of the FEIS provides a summary of the findings of the USCG’s Final MARIPARS. Finally, Appendix D of the FEIS includes a comprehensive list of proposed mitigation measures that will be considered by the decision maker during the Record of Decision.

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0081-002	<p>At the time of the review of the DEIS, Vineyard Wind had yet to select a marine construction contractor or the tools to perform the dredging and cable laying activities. In addition, raw and analyzed field data from 2018 (sediment grabs and cores, seafloor photos and videos, biological samples) were not available in time to review in conjunction with the alternatives provided in the DEIS. This information is necessary to evaluate alternatives and inform the permitting process. These data should be presented in the Final Environmental Impact Statement (FEIS) in a way that allows agencies to ensure the avoidance, minimization, and mitigation for impacts to biogenic and/or hard/complex habitats in the siting and subsequent construction of the various elements of the Vineyard Wind project.</p>	<p>Mitigation measures for potential disturbance to the seabed and habitat are generally described in the COP based on the available data collected. The FDR and FIR for the project contain results of all surveys and specific details of the proposed development locations and dimensions, types of equipment and methods of installation to be used. Seabed conditions and potential hazards can be mobile and may change over time, so final siting of the structures on the seabed will be determined based on site conditions observed just before installation from pre-construction surveys.</p> <p>The DEIS and FEIS include all currently available information and/or survey information that BOEM requires as part of the COP development. In addition, BOEM has an extensive environmental studies program, which it uses to fill data gaps. Pursuant to 40 CFR § 1502.22, when an agency is evaluating reasonably foreseeable significant adverse effects on the human environment in an environmental impact statement and there is incomplete or unavailable information, the agency shall always make clear that such information is lacking. Appendix H of the FEIS includes a discussion on Incomplete or Unavailable Information for each resource.</p> <p>The FEIS, Sections 3.1 and 3.2 have been update to include additional information on hard bottom complexes. In addition, the EFH Assessment can be found on at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/.</p>
0081-003	<p>Discussions to find an appropriate marine construction window to avoid impacts to various resources and water dependent uses (including the squid, whelk, and flounder fisheries) are ongoing with the Massachusetts Division of Marine Fisheries (DMF). DMF has proposed July/August as a preferred time of marine cable installation while Vineyard Wind indicates a preference for April through June. Vineyard Wind has stated that it may be possible to begin laying the energy export cables in the nearshore in one year, bury the partial cable segments, and then splice and continue laying the remaining cable lengths in the offshore portion of the project in the following year. To this end, Vineyard Wind states that it has been working with cable vendors for delivery earlier than originally proposed and is re-evaluating weather modeling to evaluate weather-related risk and begin dredging and cable installation earlier in the spring. The FEIS should clearly describe how the proposed construction activities will be timed, staged, and sequenced to minimize impacts to the Commonwealth's coastal resources and uses.</p>	<p>Vineyard Wind has provided a refined proposed marine construction sequence. The FEIS has been updated to account for additional construction scheduling of activities and/or time-of-year restrictions. Appendix D of the FEIS has been revised to include an updated list of mitigation measures.</p>
0081-004	<p>Vineyard Wind intends to adopt a 2-nautical mile wide regional transit lane to the south of the Wind Development Area (WDA) that is being developed through</p>	<p>Section 2.1.1.2 of the FEIS has been updated to reflect the latest information related to the demarcated 1-nautical mile corridors within the WDA and the</p>

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	discussions with Wind Energy Area lease holders, the fishing industry, state agencies, and the U.S. Coast Guard (p. 2-10). However, a transit lane layout is not depicted in the DEIS. If the transit lane as described is adopted and Alternative D (minimum 1 nm spacing among turbines) moves forward, the Vineyard Wind WDA footprint may increase and project impact values would need to be updated.	2-nautical mile wide regional navigational safety corridor. Additionally, Section 2.5 of the FEIS provides BOEM’s preferred alternative.
0081-005	Upon conclusion, the FEIS should fully describe the final wind turbine and ESP layout and all associated measures proposed to preserve existing navigation routes and ensure the safety of mariners transiting in or near the proposed project.	<p>The development of the EIS has been based on Vineyard Wind’s utilization of the PDE. The FEIS assesses the impacts of the reasonable range of Project designs that are described in the Vineyard Wind COP and presented in Appendix G by using the “maximum-case scenario” process. After publication of this FEIS, as required by law, there is a minimum 30-day mandatory waiting period during which BOEM is required to pause before issuing a Record of Decision (ROD). The ROD will state clearly whether BOEM intends to approve, approve with conditions, or deny the Vineyard Wind Construction and Operations Plan (COP) for construction, operation, and eventual decommissioning of the proposed Project.</p> <p>The final layout of the turbines and ESP will be presented in the FDR and FIR after environmental and navigation reviews are completed.</p>
0081-006	In addition, the FEIS should describe the use of sound signals, AIS transponders, and/or other design improvements to aid in navigation, as described in the DEIS (p. 2-6).	Section 3.11.2 of the FEIS has been updated to address the use of sound signals and other design improvements to aid in navigation.
0081-007	Scientific as well as anecdotal evidence from the Block Island Wind Farm suggests that hard cover not only displaces historic bottom trawl and gill net fisheries directly by reducing fishable surface area, but also indirectly by increasing recreational hook and line activity in the vicinity of turbines, subsequently decreasing trawl/gill net opportunities. Personal communication with the bottom trawl industry on the impact of hard cover protection, including so-called “trawl protectors,” suggests that the conversion of soft sediment habitat to hard bottom via protective cover will negatively impact the bottom trawl industry, increasing the risk of net hangs and vessel instability and decreasing trawlable habitat.	Section 3.9.1 of the FEIS has been revised to include for additional information on the relationship between recreational fishing and to the distance from shore. Section 3.10 of the FEIS has been revised to include additional information about effect of hard bottom cover on commercial fishing.
0081-008	In addition, the introduction of clean, hard substrate may encourage the colonization and spread of invasive species such as <i>Didemnum vexillum</i> , which is known to both displace and smother commercially-valuable sea scallops.	The FEIS, Sections 3.2.2 and 3.3.2, have been updated to describe this potential impact.
0081-009	...Vineyard Wind should evaluate opportunities to minimize...hard protection solutions...Before considering hard cover, Vineyard Wind should assess other options including: performing a second pass or using mechanical jetting to ensure appropriate depth of cover, using a combination of sand bags and gravel to cover	Section 2.1.1 of the FEIS has been updated to address cable burial risk for the proposed Project. The OECC would have a target burial depth of up to 5-8 feet (1.5-2.5 meters). The FEIS, Sections 3.1.2, 3.2.2, and 3.3.2, of the FEIS have

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	exposed cable sections, minimizing the extent of hard cover placed around wind turbine foundations, and/or using foundations that do not require scour protection.	<p>been updated to include discussion of the fact that cable burial is a priority and that cable protection would likely be minimal.</p> <p>Cable installation mechanisms described in the COP include mechanical jetting and rock saw options in order to reduce the need for additional cable protection mechanisms. Cable burial feasibility assessments are expected with the submission of the Facility Installation Reports and should detail the cable route, hazards, and specific installation methods.</p>
0081-010	Table 3.3.5-2 in the DEIS describes the potential hard cover necessary to protect the project’s assets. The total is 303 acres...Recommendations to utilize sand bags and gravel diverge from the mitigation proposed in the DEIS (p. D-3) that suggests that concrete mattresses or rock placement would be permissible to protect cables. However, in Vineyard Wind’s environmental Impact Report (EIR) filed with the Commonwealth of Massachusetts, Vineyard Wind was able to reduce its anticipated use of hard cover necessary to protect its export cables from 27 acres to nine acres through careful inspection of field data by technical engineers. A similar minimization exercise should be presented in the FEIS.	Section 2.1.1 of the FEIS has been updated to address cable burial risk for the entire proposed Project, not just the portion of the project in state waters. The OECC would have a target burial depth of up to 5-8 feet (1.5-2.5 meters). Vineyard Wind has conservatively estimated that 10 percent of the OECC would require protection, which equates to approximately 27.5 miles for the entire length of the OECC. The Project description information in the COP as well as the analysis in the DEIS and FEIS were used to analyze a maximum-case scenario through utilizing the PDE. Mitigation measures outlined in Appendix D of the FEIS could be implemented which could reduce potential impacts. The FEIS, Sections 3.1.2, 3.2.2, and 3.3.2 of the FEIS, have been updated to include discussion of the fact that cable burial is a priority and that cable protection would likely be minimal.
0081-011	... any hard cover used in the project should be quantified, mapped, and presented in the FEIS.	<p>Section 2.1.1 of the FEIS has been updated to address cable burial risk for the proposed Project. The OECC would have a target burial depth of up to 5-8 feet (1.5-2.5 meters).</p> <p>Maps delineating these habitats, based on the results of a 2018 survey reported in Attachment E of Epsilon 2018b, are shown in Appendix E of the FEIS Figures E.3-1a through E.3-1e. Hardcover area locations will not be finally determined until installation and will be documented in as-built drawings. The final layout of the turbines and ESP will be presented in the FDR and FIR after environmental and navigation reviews are completed.</p>
0081-012	According to 30 CFR Part 385 and other BOEM requirements, Vineyard Wind must remove all installations and clear the seabed of all obstructions created by the project within two years of termination of its lease. Chapter 3 of the DEIS mentions that decommissioning would include leaving onshore facilities in place, while removing the offshore export cable, scour protection and hard protection atop cables (pp. 3-54, 55). In addition, WTG and ESP structures would be removed to 15 feet below the mudline and shipped to ports for disposal (p. 3-185). The FEIS should more fully describe this process and Vineyard Wind’s financial commitment to decommissioning and appropriate landside disposal.	As described in Section 2.1.1.3 of the FEIS, pursuant to 30 CFR Part 585 and other BOEM requirements, Vineyard Wind would be required to remove or decommission all installations and clear the seabed of all obstructions created by the proposed Project. Vineyard Wind would need to obtain separate and subsequent approval from BOEM to retire any portion of the Proposed Action in place.

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0081-013	<p>CZM is supportive of the construction mitigation proposed to minimize impacts to birds, marine mammals, sea turtles, and cultural resources, in particular:</p> <ul style="list-style-type: none"> • installing the export cable conduits between September 1 and May 31 to avoid nesting shore birds and horseshoe crab spawning; • avoiding nearshore cable laying during low tide from mid-July to mid-September to minimize disturbance to terns; • using horizontal direction drilling at landfall transition sites to avoid eelgrass and other nearshore habitats and resources; • using soft start pile driving techniques; • using qualified monitors, thermal imaging, and passive acoustic monitoring to assist in avoiding impacts to marine mammals; • avoiding wind turbine pile driving between January 1 and April 30 to protect marine mammals; and • using bird deterrent devices on wind turbines. 	<p>Appendix D of the FEIS includes a comprehensive list of the updated monitoring and mitigation measures that have been assessed in the FEIS as a result of this and other comments received on the DEIS.</p>
0081-014	<p>In addition, the FEIS should provide additional analysis on the use of Aircraft Detection Lighting Systems (ADLS) that would reduce nighttime visual impacts to coastal communities and may be used to replace the types of permanent lighting that are known to attract migrating birds.</p>	<p>Sections A.8.3 in Appendix A, Section 3.9.2, and Appendix D of the FEIS have been revised to include an updated discussion of ADLS.</p>
0081-015	<p>Regarding the installation of cables in the seafloor, CZM supports:</p> <ul style="list-style-type: none"> • methods that result in simultaneous cable laying and burial in soft sediments (as opposed to trenching and laying the cable at a later time); • utilizing all available means to ensure that both export and inter-array cables are buried to a minimum of six feet; • using all available field data and technology to minimize the amount of dredging required and; • exhausting all available mechanical means for cable burial and then implementing soft sediment and gravel cover if cable protection is needed (avoid concrete mattresses or rock protection). 	<p>Sections 3.1.2, 3.2.2, and 3.3.2 of the FEIS have been updated to include information on the fact that cable burial is a priority and that cable protection would likely be minimal. In addition, Section 2.1.1 of the FEIS has been updated to address cable burial risk for the entire proposed Project, not just the portion of the project in state waters. The OECC would have a target burial depth of up to 5-8 feet (1.5-2.5 meters). Vineyard Wind has conservatively estimated that 10 percent of the OECC would require protection, which equates to approximately 27.5 miles. The proposed Project description information in the COP as well as the analysis in the DEIS and FEIS were used to analyze a maximum-case scenario through utilizing the PDE. Mitigation measures outlined in Appendix D could be implemented which could reduce potential impacts.</p>
0081-016	<p>CZM supports the continued use of Notices to Mariners and the fisheries liaison as means of communicating the daily location of construction activities to recreational and commercial vessel operators.</p>	<p>Thank you for your comment.</p>
0081-017	<p>Regarding the loss of fishing gear and fisheries opportunities, CZM supports the financial compensation programs evaluated for the WDA and within the export cable corridor as mentioned in Appendix D (pp. D-3, 5). In particular:</p> <ul style="list-style-type: none"> • compensation to fishermen with a demonstrated history of fishing within the construction area who would be excluded during the construction of the project; and • compensation to fishermen for the loss of gear during construction. 	<p>Section 3.10 and Appendix D of the FEIS have been revised to include the Vineyard Wind's voluntary established gear loss and revenue compensation funds for fishing interests based in Rhode Island, Massachusetts, and other states. Please see Section 3.10 and Appendix D of the FEIS for more details on the measures.</p>

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0081-018	CZM recommends that Vineyard Wind continue to coordinate with EEA, CZM, DMF and fishermen to establish appropriate mitigation for Massachusetts fisheries interests. The FEIS should clearly describe the status of compensation discussions with Massachusetts fishermen for losses incurred during construction within the WDA and export cable corridor. Additionally, the FEIS should discuss mitigation to Massachusetts fishermen for the potential loss of fishing opportunity over the lifespan of the project within the WDA due to turbine layout, turbine scour protection, the energy service platform(s) placement, and cable placement and protection.	Section 3.10 and Appendix D of the FEIS have been revised to include the Vineyard Wind’s voluntary established gear loss and revenue compensation funds for fishing interests based in Rhode Island, Massachusetts, and other states. Please see Section 3.10 and Appendix D of the FEIS for more details on the measures.
0081-019	CZM is supportive of the regional monitoring program proposed by Vineyard Wind that will be performed by the University of Massachusetts Dartmouth School of Marine Science and Technology (SMAST) with input from various state and federal agencies. This program will evaluate the potential long-term effects of the WDA on fisheries and may prove useful in the review and permitting of future offshore wind projects. CZM will continue to participate in the long-term fisheries monitoring group to provide input on important areas of study associated with the build out of the WDA, including: <ul style="list-style-type: none"> • changes in sediment and larval transport in the WDA; • colonization of project-related hard substrate; • changes in bathymetry associated with scour around turbines; • changes in navigation and fisheries activity associated with the WDA; and • changes in fish, mollusk, or crustacean abundances or assemblages in the WDA. 	Section 3.10.2 of the FEIS has been updated to address this information. Appendix D of the FEIS has also been updated to account for the SMAST information.
0081-020	In addition to the long-term fisheries monitoring plan, the FEIS should describe a framework for monitoring to verify modeling predictions associated with the full project: during construction, post-construction, and over the long term. The monitoring framework should be sufficient to describe changes in bathymetry, sediment grain size, and biota (e.g. cod and black sea bass) within the full project footprint associated with dredging, cable installation, foundation installation, and any necessary cable/foundation protection.	Section 3.2.2 of the FEIS lists Vineyard Wind’s commitments to monitoring and cites Vineyard Wind’s Final Environmental Impact Report. The document has been updated to account for this and similar comments.
0082-001	While I am concerned about the effect on the wildlife that will be affected, I believe it is in my best interest to support the project. We have lived in the shadow of the Pilgrim Nuclear Power Plant for years. I think Wind is a safer alternative.	Thank you for your comment.
0083-001	We were encouraged that the Draft Environmental Impact Statement found that most of the environmental impacts of this project will be negligible or of minor negative impact. Given the seriousness of what we know is coming if we do not end fossil fuel emissions, the risks of this project seem very small, and the	Thank you for your comment.

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	positive potential--both of the power the project would generate and the precedent it would set for offshore wind development in New England--is great.	
0084-001	The 58 members of the Rhode Island Party and Charter Boat Association would like to offer the following comments on Vineyard Winds proposed wind farm offshore from Rhode Island. We were surprised by the lack of information regarding tuna and shark. We fish in this area, particularly Gorgon’s Gully for tuna and shark. The Star, The Claw, and the inside fingers are all close by. When the wind farm is being built, we believe not much will be swimming in the area. It would be bad for business if we steam all the way out there only to find so much noise and commotion that nothing is in the area. Our boats are not that fast and finding another spot could be impossible. How far away will the fish be driven off? we don’t know. Maybe the areas to the west will also be impacted. The tuna and sharks got to this area because they find food like squid, mackerel and butterfish. If those species go away because of the noise, the tuna will not show up.	Section 3.3.1 of the FEIS has been updated to include additional information on highly migratory species, which are further discussed in detail in the EFH Assessment. Furthermore, additional language was added to Section 3.10.2 of the FEIS to discuss the areas used by recreational fishermen. As discussed in the revised Section 3.3.2 of the FEIS, most impacts on fish would likely be temporary, occurring only during the construction phase, as the fish would likely return once construction has finished. Ecosystem models discussed in the revised Section 3.3.2 of the FEIS have found increased biomass for benthic fish and invertebrates, and possibly for pelagic fish, after offshore wind farm installation.
0084-002	Using Vessel Trip Reports to show how much we fish in the area is inaccurate. VTR’s only have one location on them, but we troll many miles a day when we fish for tuna and we drift for miles when we fish for shark. We had the same issue when they put in the block island wind farm and we ended up using a program by SeaPlan to track our trips to show where we fish. That needs to be done here too.	Both VMS and VTR data are used in the revised Section 3.10.1 of the FEIS to characterize fishing in and around the WDA. The FEIS acknowledges that VMS and VTR data collection methods have different benefits and limitations.
0084-003	Also very important is the USCG. If we have a problem out there with a boat full of private people, will the coast guard still be able to help in the same way they would without all the windmills in the way? What if its foggy that day? that would make it even more difficult. We think there may be some days where you wouldn’t even want to go near the things. The ones off Block Island are big and when its rough, going near them is not a good idea.	Section 3.12 of the FEIS has been updated to address the Marine Coordinator position. Section 3.11 of the FEIS has been revised to addresses coordination with the USCG. Sections 2.3, 3.11.2, and 3.10.1 of the FEIS have been revised to describe the need for USCG approval for use of WTGs and ESPs as PATONS.
0085-001	Off-shore wind will allow us to be energy independent, and it will create many important short and long-term jobs. Additionally, Vineyard Wind has proven to be an engaged and thoughtful community partner. Last, to alleviate the consequences of climate change, we need this project and many more like it!	Thank you for your comment.
0086-001	In the Executive Summary, on Page ES-5 under Alternative D and Sub Alternatives D-1 and D-2, the DEIS implies Alternative D will result in a 22% increase in the footprint of the project, this is incorrect because Vineyard Wind has committed to a larger turbine that will produce the same project need with 84 turbines which fit into the same space as Alternative A	The development of the EIS has been based on Vineyard Wind’s utilization of the PDE, which included a range of 8-10 MW WTGs as assessed in the DEIS and was updated to allow for up to 14 MW WTGs. The FEIS assesses the impacts of the reasonable range of Project designs that are described in the Vineyard Wind COP and presented in Appendix G by using the “maximum-case scenario” process. Therefore, for Alternative D1 and D2, it was assumed based on the maximum-case scenario, that there would be 100 turbines resulting in an increase of approximately 22 percent.

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0086-002	In Table ES-3 Mitigation Measures: Implementation of Fisheries Communication Plan. Including use of Fisheries Liaisons, Fisheries Representatives, and resource monitoring programs for fishery impacts, should not be considered mitigation measures.	The Fisheries Communication Plan measures identified in Table ES-3 of the DEIS has been removed. This is a self-imposed measure by Vineyard Wind which is included as part of the Proposed Action and not a mitigation or monitoring measure being included as a potential condition of COP approval. Appendix D of the FEIS includes all mitigation and monitoring measures being considered by BOEM as part of the condition of COP approval, if approved.
0086-003	Collisions and Allisions [Section 2.3]. Injuries and fatalities to humans are also a possibility, but not listed. There are also concerns that USCG rescue attempts could be affected by the installation of wind turbines for several reasons, particularly in severe weather and limited visibility. Impacts to rescue missions need to be further explored.	Section 3.11 of the FEIS has been updated to account for the potential risk for collisions. In addition, the FEIS has been updated on consequences (e.g., injuries, oil spills, damage to boats/WTGs). The EIS anticipates that SAR missions in all weather conditions will be more complex as a result of the proposed Project. BOEM maintains regular communication with the Coast Guard on all offshore wind and navigation safety related items. For more information on impacts on SAR missions, refer to Vineyard Wind’s Navigation Risk Assessment and Supplemental Navigation Risk Assessment. In addition, as a condition of COP approval and pursuant to 30 CFR 585.627(d), BOEM requires Vineyard Wind to submit a Safety Management System that describes safety, monitoring, emergency response, fire suppression, management system testing, and personnel training. The SMS must be fully functional before installations commence.
0086-004	Table 2.4-1: Summary and Comparison of Impacts by Action Alternatives with No Mitigation Measures. The line that addresses commercial and for hire recreational fisheries suggests that Alternatives D1, D2, and E as standalone Alternatives have impacts “Similar to the Proposed Action, potentially to a lesser degree”, but this is not the case. A combination of Alternative E and D2 would be necessary to expect a “lesser degree” of commercial and for-hire recreational fishery impacts.	Alternatives are considered as stand-alone. Alternative D2 is preferred by various groups to other alternatives. The FEIS has been updated to reflect new analysis and information since publication of the DEIS and SEIS.
0086-005	Table 2.4-1: Summary and Comparison of Impacts by Action Alternatives with No Mitigation Measures. The line that addresses Benthic Resources does not adequately consider that even with scour protection silt can be pulled away from the WTG base and scour protection by moving water and smother the surrounding habitat. More studies need to be conducted to evaluate the magnitude of this potential.	The FEIS has been updated to describe scour protection under Section 3.2.2. The FEIS lists potential types of cable protection in Sections 3.1.2 and 3.2.2. In addition, the potential location of cable protection, including cable burial risk assessment, is discussed in Sections 3.1.2 and 3.2.2 of the FEIS.
0086-006	The FAB has been, and continues to be, concerned with an apparent level of disfunction between BOEM and NOAA. An over dependence on public input to the scientific inquiries associated with offshore wind development is a specific weakness...This documents characterization of the affected environment and environmental consequences relative to Finfish, Invertebrates, and EFH suffers from this continued disfunction.	NMFS and BOEM have cooperated in an iterative and collaborative process to review and update the FEIS, which includes characterization of potential effects to Finfish, Invertebrates, and EFH as well as the EFH Assessment report.

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0086-007	The FAB feel inadequate attention has been given to the impacts of the energy created from the proposed pile driving...Impacts to juvenile stages of all species found in the WDA, as well as the surrounding areas around the WDA, need to be better understood and characterized in the DEIS. The FAB has concerns for juvenile lobster, crab, clams, scallops, squid, mackerel, groundfish, butterfish, among others. The FAB feels more information is warranted and necessary to assess impacts to all life stages of Finfish, Invertebrates, and EFH.	The FEIS has been updated to describe the expected results of pile driving noise on finfish, invertebrates, and EFH and the resulting impact determination in Section 3.3.2.
0086-008	Highly Migratory Species (HMS) are not considered adequately...as the result of hammering monopiles into the bottom. Migration patterns, feeding behavior due to noise, the impacts of the construction and operation due to noise and acoustic energy waves on the forage species such as squid, mackerel, butterfish and herring that draw HMS to the area need more consideration.	The FEIS has been updated to describe the expected results of pile driving noise on highly migratory species and their prey items in Section 3.3.2.
0086-009	Consideration of the impacts of Electromagnetic Fields (EMF) to pelagic shark species is also inadequate. Potential impacts to HMS during operation need to be better quantified.	The FEIS has been updated to include additional studies on EMF and a conclusion about potential impacts of EMF to pelagic species in Section 3.3.2.
0086-010	3.3.6.1 Finfish, Invertebrates, and Essential Fish Habitat. Inadequate documentation and consideration of the effects of construction, particularly monopile installation and hammering of monopiles which create acoustic energy impacts on squid and squid eggs.	Section 3.3.2 of the FEIS presents a summary discussion of construction-related effects to finfish, invertebrates, and EFH. Further details regarding these impacts are provided in the EFH Assessment, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents .
086-011	3.3.6.10. This section needs to include all proposed wind energy development projects within RI and MA WEAs as part of cumulative impact analysis, including all successful lease sales within the MA WEA concluded in December 2018.	BOEM has revised the list of reasonably foreseeable future offshore wind projects based on project progress since publication of the DEIS, and this information was included in the SEIS and carried forward to the FEIS. The list of reasonably foreseeable future offshore wind projects is included in Appendix A of the FEIS.
0086-012	3.4.5 Commercial Fisheries and For Hire Recreational Fishing. The DEIS is completely inadequate as it details potential economic impacts to the commercial fishing industry. A lack of understanding of the intricacies involved in commercial fishing operations is clear in this section and more needs to be done to better characterize the affected environment for commercial fisheries. Resources available through RI DEM would better inform this section.	Section 3.10.1 (formerly 3.4.5.1) of the FEIS has been revised. The DEIS included several tables for the Vineyard Wind Lease Area from the RI DEM report, however, those tables were considered inaccurate by the NOAA. NOAA provided data specific to the Vineyard Wind and the WDA areas that is now included in the EIS. The report acknowledges that VMS and VTR data collection methods have different benefits and limitations. Both VMS and VTR sources are included in the FEIS.
0086-013	Inadequate analysis of the impacts to the commercial and recreational for hire fishing industry within the WDA and along the OECC needs to be addressed. The high value of the bottom along the OECC warrant further data collection and analysis. The analysis done by BOEM considers a Kirkpatrick (2017) assessment which uses vessel trip reports (VTR). The way VTR's are completed by fishermen, in particular, the input of location data required on the report is not representative of the entire fishing trip. Relying strictly on VTR data will result in grossly underrepresented catch landings associated with specific areas.	The DEIS included several tables for the Vineyard Wind Lease Area from the RI DEM report, however, those tables were considered as inaccurate by the NOAA. NOAA provided data specific to the Vineyard Wind and WDA areas that is now included in the revised FEIS. The report acknowledges that VMS and VTR data collection methods have different benefits and limitations. Both VMS and VTR sources are included in the FEIS.

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0086-014	3.4.5 Commercial Fisheries and For Hire Recreational Fishing. The DEIS is completely inadequate as it details potential economic impacts to the recreational for hire fishing industry. A lack of understanding of the intricacies involved in recreational for hire fishing operations is clear in this section and more needs to be done to better characterize the affected environment for recreational for hire fisheries. Using Vessel Trip Reports to determine area fished is a flawed methodology and understanding the nature of HMS fisheries prosecuted by the recreational for hire industry is critical to assessing the impacts to the fishery.	Thank you for your comment.
0086-015	Additional sources of data such as reports published by RI Department of Environmental Management’s Division of Marine Fisheries are available and better represent the economic value of commercial landings from the VW WDA.	The DEIS included several tables for the Vineyard Wind Lease Area from the RI DEM report, however, those tables were considered as inaccurate by the NOAA. NOAA provided data specific to the Vineyard Wind and WDA areas that is now included in the revised FEIS. The report acknowledges that VMS and VTR data collection methods have different benefits and limitations. Both VMS and VTR sources are included in the FEIS.
0086-016	The DEIS should clearly state that vessels already fishing in the areas where displaced vessels would be forced to fish are equally impacted by the project. Not just the vessels forced out of the WDA.	Added to Section 3.10.2: “Vessels already fishing in the areas where displaced vessels would be forced to fish would be also impacted by the Project, as this would increase competition over existing fish stock.”
0086-017	The DEIS states “For-hire fishing would have more flexibility for use of the area during construction and installation”. The FAB’s experience with the Block Island Wind Farm project proves this to be inaccurate, fishing ceases during construction.	It has been acknowledged in the DEIS that “Fishing vessels may also choose to avoid fishing in proximity to construction activities, regardless of safety restrictions” however given that only portions of the WDA will be closed during construction at a time, it is expected that fishing in the WDA will continue. The FEIS adds that “For-hire fishing boats are typically smaller compared to commercial fishing boats, which improves their maneuverability.”
0086-018	Disruption of Fishing in WDA/OECC...the DEIS inadequately describes the potential economic loss to the commercial and recreational for hire fisheries. The economic impacts need to be further studied and completely re-assessed.	Fishing revenue/landings data were provided by NOAA; VMS data from RI DEM and revenue-intensity rasters data were also used to assess impacts on commercial fisheries. BOEM has considered there is limited data that is available for for-hire recreational fishing boats. Assessment of economic impacts in Section 3.10.2 has been reviewed and revised to better present the economic impacts of the Project.
0086-019	3.4.5.3 Impacts of Alternative A (Proposed Action) on Commercial Fisheries and For Hire Recreational Fishing: Disruption of Fishing in WDA/OECC. The statement “Since the specifics of the mitigation plan are not currently available BOEM expects operations and maintenance of the Proposed Action on fishing within the WDA/OECC would have a minor to moderate impacts on the commercial fisheries and for-hire recreational fishing industry depending on the level of mitigation provided.” should be removed because it makes assumptions that are not known. A mitigation plan agreed to between Vineyard Wind and the CRMC’s Fishermen’s Advisory Board does not exist, so how BOEM determine if the effects of the project would be mitigated?	Section 3.10.2 (formerly 3.4.5.3) of the FEIS has been revised to address this comment, and to address the February 21, 2019 agreement between Vineyard Wind and Rhode Island Coastal Resources Management Council.

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0086-020	<p>Relating to “Vineyard Wind anticipates no more than 10 percent of the cables may not achieve the proper burial depth and would require cable protection in the form of rock placement, concrete mattresses, and/or halfshells”. The FAB feels the projection that up to 10% of the cable route may require cable protection is a significant impact, particularly considering the cable route which runs through valuable squid grounds. Adding potential snags in this area will have major impacts to the squid fishery.</p>	<p>As discussed in the revised FEIS, Vineyard Wind considers cable burial a priority, and would use iterative analyses of survey data, advanced burial techniques, and micro-routing to maximize burial and minimize the need for cable protection (Epsilon 2018a). Based on survey data, Vineyard Wind expects that burial of the inter-array cables would be successful without requiring cable protection. Vineyard Wind would survey the cable burial depth after construction and would monitor the depth periodically. The DEIS already considered a potential mitigation measure of requiring a minimum cable burial depth. Section 3.10.1 of the FEIS has been revised to provide data from multiple sources, including VMS and VTR data. BOEM acknowledges that both types of data collection methods have different limitations and advantages and that analysis is constrained by data availability. Data sources that are included in Section 3.10.1 of the FEIS are revenue intensity data (available publicly at https://www.boem.gov/Renewable-Energy-GIS-Data/); fishing revenue and landed pounds data by species, port, gear type, and state provided by NOAA; data from the addendum to “Spatiotemporal and economic Analysis of Vessel Monitoring System Data within Wind Energy Areas in the Greater North Atlantic” prepared by the RI DEM; as well as results from the “Rhode Island Fishing Value in the Vineyard Wind Construction and Operations Plans Area” also prepared by the RI DEM. Quantitative data to characterize for-hire recreational fishing in the WDA is extremely limited and qualitative information is mostly used to describe that industry.</p>
0086-021	<p>3.4.5.3 Impacts for Commercial Fisheries and For Hire Recreational Fishing. Appendix D include items that the FAB feels are not mitigation. Communication plans, monitoring and research are not mitigation. In addition, if project results in areas that cannot be fished, this is a major impact and it always will be. Compensation cannot not reduce the impact to a minor or moderate classification... Compensating fishermen because they cannot prosecute a fishery they have spent years building may be necessary, but compensation does not lessen the impacts.</p>	<p>The FEIS has been revised to clarify this point. Mitigation includes strategies, plans and programs to reduce, avoid, or manage impacts. Monitoring is a program used to determine historical and current patterns of use, and changes in values and resource-dependency. Therefore, monitoring helps to understand how conditions change compared to baseline and it allows to identify areas that may require correction. Good mitigation always includes monitoring programs to understand whether preventative actions are working properly or whether intervention is required.</p> <p>Section 3.10.2 of the FEIS has been revised to include a discussion of displacement and potential conflict over fishing grounds and voluntary compensation. Section 3.10 of the FEIS has been updated to include details of mitigation and monitoring measures relative to commercial fisheries, including voluntary financial compensation. Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.</p>

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0086-022	3.4.5.3...Conclusion. The conclusions BOEM makes regarding the impacts on Commercial and For Hire Recreational Fishing is flawed due to incomplete data collection and the lack of necessary research needed to properly assess potential impacts. The rush by BOEM to get this DEIS out the door is evident throughout the document. Without further research, industry engagement, and consideration of existing data sources, none of the conclusions can be taken seriously. BOEM has ...underestimated the impacts to those fisheries.	BOEM used data from various source to conduct economic effect assessment of the project on fisheries. Fishing revenue/landings data were provided by NOAA; VMS data from RI DEM and revenue-intensity rasters data were also used to assess impacts on commercial fisheries (Section 3.10.1 of the FEIS). BOEM has considered that there is limited data available for for-hire recreational fishing boats. Assessment of economic impacts in Section 3.10.2 (formerly 3.4.5.3) of the FEIS has been reviewed and revised (based on comments from the NOAA and the public).
0086-023	3.4.5.3...Conclusion. The document continues to suggest that monitoring for fishery impacts is a form of mitigation. This is not accurate. Monitoring and research are required as part of a best practices procedure and stand alone separate from fishery mitigation. The document needs to be changed throughout to reflect that.	The FEIS has been revised to clarify this point. Mitigation includes strategies, plans and programs to reduce, avoid, or manage impacts. Monitoring is a program used to determine historical and current patterns of use, and changes in values and resource-dependency. Therefore, monitoring helps to understand how conditions change compared to baseline and it allows to identify areas that may require correction. Good mitigation always includes monitoring programs to understand whether preventative actions are working properly or whether intervention is required.
0086-024	3.4.5.3...Conclusion. Long-term monitoring of cable placements: Cable monitoring and re-securing cables is not a form of mitigation. Cable monitoring should be required as part of a best practice procedure and stands alone from fishery mitigation.	Appendix D of the FEIS has been updated as a result of this and other comments to distinguish mitigation and monitoring.
0086-025	3.4.5.6... Alternative D. The DEIS continues to claim that Alternative D will increase the used area of the WDA by 22%. VW has committed to using bigger turbines that will reduce the number of turbines needed and the footprint will remain the same as Alternative A. Throughout the document this should be corrected, and the area affected should be recalculated. The layout of all the turbines in an east-west manor, combined with 84 turbines spaced at least one mile apart is the only viable option for fishing to coexist with the project.	The development of the EIS has been based on Vineyard Wind’s utilization of the PDE, which included a range of 8-10 MW WTGs as assessed in the DEIS and was updated to allow for up to 14 MW WTGs. The FEIS assesses the impacts of the reasonable range of Project designs that are described in the Vineyard Wind COP and presented in Appendix G by using the “maximum-case scenario” process. Therefore, for Alternative D1 and D2, it was assumed based on the maximum-case scenario, that there would be 100 turbines resulting in an increase of approximately 22 percent.
0086-026	3.4.5.10...(Tables 3.4.5-10 and 3.4.5-11) The difference in assessments between these two tables are presumptuous. Appendix D outlines potential mitigation but does not clearly address sufficient compensation. It appears to be copied from the COP, which suggests that BOEM is only applying the Vineyard Wind strategy for addressing mitigation, which is insufficient in this matter.	Section 3.10 and Appendix D of the FEIS have been revised to include the Vineyard Wind’s voluntary established gear loss and revenue compensation funds for fishing interests based in Rhode Island, Massachusetts, and other states. Please see Section 3.10 and Appendix D of the FEIS for more details on the measures.
0086-027	3.4.5.11 Cumulative Impacts. BOEM has not researched relevant cumulative impacts to any meaningful level. The fishing community has continuously asked for more research to better understand how all the proposed projects when put together, will impact the ecosystem. We have asked for more research on the cumulative impacts to the commercial and recreational for hire fishing. The FAB is concerned with lack of research by BOEM on cumulative effects... Vineyard	Section 3.10 of the FEIS has been updated to include an assessment of commercial fisheries revenue exposure, per the edited list of reasonably foreseeable future offshore wind projects as described in Appendix A. The individual resource sections have been updated in the FEIS to account for the new list of reasonably foreseeable future offshore wind projects.

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	Wind has yet to conduct a biological site assessment or any research on cumulative impacts.	
0086-028	3.4.7.11 Incomplete or unavailable information. Not including VMS data is a major oversight. AIS data will only characterize the traffic of vessels over 65 feet and only since 2015. The data used to analyze navigation and vessel traffic is insufficient and needs to be improved to accurately understand vessel traffic and navigation.	VMS data have been considered by reviewing aggregated VMS data presented in Vineyard Wind’s Supplemental Navigation Risk Assessment as well as information provided by NMFS. The FEIS has been updated to include the new, best available information for assessment purposes.
0086-029	BOEM does not anticipate impacts on commercial fisheries to result in irreversible impacts. Without the data to back up BOEM’s assumptions that impacts to the commercial and recreational for hire fisheries will be irreversible, the FAB cannot support this claim.	Irreversible impacts are defined in Chapter 6 of the DEIS (now found in Appendix C of the FEIS) as occurring when the impacts from the use limit the future options of its use, due to use or destruction of a specific resource. BOEM recognizes the differing opinions stakeholders have regarding this topic.
0086-030	Relationship of the Short-term use of Man’s Environment and Enhancement of Long-term Productivity. BOEM does not provide any data to support the notions that the mitigation measures are sufficient or that the WDA will return to normal after decommissioning; The FAB takes issue with the many conclusion’s made throughout this document by BOEM which lack necessary data to back them up.	The impact assessment presented in both the DEIS and FEIS takes into consideration the measures that Vineyard Wind has committed to self-implement to avoid or reduce potential impacts on the resources discussed in Chapter 3 and Appendix A. BOEM considered only those measures that Vineyard Wind has committed to in the COP to be part of the Proposed Action and action alternatives. BOEM may select alternatives and/or require additional mitigation and/or monitoring measures to further protect these resources; other mitigation measures may be required through reviews under several environmental statutes. Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. Additional mitigation and monitoring measures may arise from consultations and coordination with Federal and State resource agencies. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision. In addition, FEIS has been updated to analyze the new identified measures.
0086-031	C.1.8. Fisheries Use and Management. This section of Appendix C is filled with misrepresentations and does not include important information. The FAB is convinced that more than 5 or 6 lobster vessels fish in the VW WLA. The section does not include landing of HMS by general category commercial fishermen or recreational for hire fishermen. This section cites the COP (COP Section 7.6.2.2, Volume III; Epsilon 2018) when stating that no pots/traps or fishing by longline occurred in the WDA or along the OECC. This is not true, the COP states that traps/pots and gillnets “likely” fish in the WDA and along the OECC.	The revised Section 3.10.1 of the FEIS includes fishing revenue/landing data by species, gear type, port, and state from the NOAA. Lobster fishing revenue and landings for that period are presented. In addition, the use of pots is evident. Please use that section for information on the current environment in the WDA.
0086-032	Appendix D- Mitigation and Monitoring: Research and Monitoring are not mitigation technique’s and should not be included within a mitigation plan. Research and Monitoring should be analyzed in a separate section of the DEIS. This is true of all offshore development project that BOEM considers. BOEM needs to understand monitoring and research do not equal mitigation.	Appendix D of the FEIS has been updated as a result of this and other comments to distinguish mitigation and monitoring. Monitoring efforts identified are intended to identify trends and possible means for improvements through refinement of monitoring requirements and are therefore a critical element of mitigation.

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0086-033	The FAB finds the only viable Alternative offered in the DEIS is a combination of Alternative E- reduced project size and Alternative D-2 East-West orientation and minimum 1 mile spacing for the turbine layout. This combination of Alternatives offers the only chance for a fishery to co-exist in the WDA and the only potential way a mitigation strategy could be developed that will adequately consider the impacts to the fisheries represented by the FAB.	Section 2.5 of the FEIS has been included to identify the agency-preferred alternative.
0086-034	Absent the above alternatives being selected and approved with appropriate and realistic mitigation measures implemented by BOEM, the FAB preferred alternative is Alternative F No Action Alternative....	Thank you for your comment.
0087-001	The Southeastern region of Massachusetts has not experienced the same robust economic growth that greater Boston’s innovation economy has achieved. However, we believe that our region’s “blue economy” will help catalyze this region’s economic trajectory. As the United States’ first utility scale offshore wind project, it will brand this region as a hub for renewable energy and marine science and technology...We believe that offshore wind can become one of this region’s next “anchor” industry, and we support this project.	Thank you for your comment.
0087-002	In particular, we are writing in support of the 3,600 full-time jobs that Vineyard Wind is committing to creating, primarily located in the Southeastern Massachusetts region. Beyond the direct employment, we look forward to working with Vineyard Wind to identify supply chain opportunities for our region’s existing businesses. This project can also promote the creation or relocation of related industry partners and employers to our region.	Thank you for your comment.
0088-001	We have stated our support many times for the complete removal of all equipment when the time comes for decommissioning this project. No parts of this project should be left behind, including the parts of the turbine 15ft below the surface that VW plans to leave in place.	The DEIS, Section 2.1.1.3, included the requirements for decommissioning for the proposed Project. The FEIS includes the decommissioning requirements as well in Section 2.1.1.3.
0088-002	It is also mentioned that “cables may be retired in place”. For fishing to resume as it did prior to construction, all obstructions must be removed from the ocean floor. Cables left in place are “hangs” that fishing gear has the risk of getting caught on. This poses an obvious problem for the fishing industry especially when there is no one responsible for maintaining these cables or any means for reimbursement to the industry for lost and/or damaged gear.	Section 2.1.1.3 of the FEIS has been revised to discuss how, under provisions of 30 CFR Part 585 and other BOEM requirements, Vineyard Wind would be required to remove or decommission all installations and clear the seabed of all obstructions created by the proposed Project. Vineyard Wind would need to obtain separate and subsequent approval from BOEM to retire any portion of the Proposed Action in place (e.g., offshore cables). Section 3.10.2 and Appendix D of the FEIS has also been revised to discuss the interaction of the fishing gear and project infrastructure, as well as mitigation measures in place such as achieving proper cable burial depth, long-term monitoring of cable placement, and various measures to compensate for fishing gear loss or damage.
0088-003	Also in regard to cables, the planned burial depth of the cable at 5-8 feet poses a very real risk for gear conflicts. The Block Island Wind farm cable is buried at 6 feet and has recently become exposed, endangering beachgoers. If Vineyard	It is in Vineyard Wind’s best interested to ensure the cable remains sufficiently buried. The OECC would have a target burial depth of up to 5-8 feet (1.5-2.5 meters) as described in Section 2.1.1.1 and Appendix G of the FEIS. At the

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	Wind chooses not to bury the cable deeper than 8 feet, there should be frequent monitoring of the cable throughout the year, rather than the suggested annual basis.	Covell’s Beach landfall location, the onshore transition would be achieved via HDD (deeper burial). Post-construction monitoring of the OECC is discussed in Appendix D of the FEIS.
0088-004	The DEIS states that the “removal of rock and concrete mattresses from cable and scour protection could be viewed as detrimental since it would involve removing any hard-bottom communities that would have been established over the previous 30 years” and in the paragraph above it’s stated: “that VW will be restoring the seafloor to it’s original state”. Leaving the mattresses and scour protection in place is not restoring the seafloor to its original state. The DEIS states that the impact of decommissioning is minor, however considering to NOT restore the seafloor to its original state is a major impact to the habitat and the fishing industry.	Chapter 2 and various sections of the FEIS have been revised. The decommissioning will remove project infrastructure from the WDA. Wind would be required to remove or decommission all installations and clear the seabed of all obstructions created by the proposed Project. Vineyard Wind would have to complete decommissioning within 2 years of termination of the lease and either reuse, recycle, or responsibly dispose of all materials removed. In consideration of mobile gear fisheries (i.e., dredge and bottom trawl gears), Vineyard Wind is committed to removing scour protection during decommissioning. By maintaining an inventory list of all components of the proposed Project, the decommissioning team would be able to track each piece so that no component would be lost or forgotten. Although the proposed Project has a designed life span of 30 years, some installations and components may remain fit for continued service after this time. Vineyard Wind would have to apply for an extension if it wanted to operate the proposed Project for more than 30 years.
0088-005	We were told that the industry would have input in how the array was designed, but we were left out of the process. Had Vineyard Wind involved the industry in the initial design of the array they would have realized that their current array scheme would not work for larger vessels to tow their gear through safely and efficiently. The industry has been vocal about the need for E/W orientation. The port of Point Judith even scheduled a miniworkshop with BOEM’s Chief of the Office of Renewable Energy Programs, James Bennett, to explain the necessity of the E/W orientation and how we’ve been operating in that fashion for decades in that area.	Section 2.1 of the FEIS has been updated to provide additional information about the Proposed Action and Alternatives considered. Appendix C (formerly Chapter 4) of the FEIS has been updated with information on the coordination and consultation process to date as well as the public participation process for the proposed Project. Section 3.11 of the FEIS has been updated to provide additional information related to the patterns used by the fishing industry. In addition, similar comments on this matter, including those from RI CRMC were reviewed and incorporated in the FEIS.
0088-006	It’s mentioned in the DEIS that Vineyard Wind “intends to adopt a 2-nautical-milewide regional transit lane that is being developed through discussion among fishing stakeholders and state agencies”. The industry has repeatedly supported 4nm wide transit lanes. I would also like it to be known that the industry agreed to move the eastern most N/S transit lane OUT of Vineyard Wind’s lease area at their request. We hope that BOEM will offer a set of alternatives that work for everyone involved.	Sections 2.1.1.2 and 3.11 of the FEIS have been revised to address both the 2 nautical-mile-wide navigational safety corridor identified by the Massachusetts Fisheries Working Group on Offshore Wind, as well as the results of the Final MARIPARS.
0088-007	Within the DEIS, there seems to be a lack of concern for the current habitat that will be altered and more concern for the potential “reef habitat” resulting from construction. It’s concerning that the potential for “permanent habitat conversion” is only considered a moderate impact. For the species that rely on that specific habitat and the industry and economies that depend on those species, “permanent	Sections 3.1.2 and 3.2.2 of the FEIS clarifies that habitat conversion would cause a substantial increase in rare hard habitat and an insignificant decrease in common soft habitat. An individual displaced from its preferred habitat by proposed Project activities would have to wander a maximum radial distance of approximately 85 feet (26 meters) before encountering its preferred habitat type. Section 3.3 of the FEIS acknowledges that sessile or less mobile species and life

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	habitat conversion” is a MAJOR impact that will not be “moderately beneficial”, as stated in the DEIS.	stages that are unable to escape construction areas would be subject to greater mortality.
0088-008	Since our first contact with BOEM in 2016 and Vineyard Wind in 2017 we’ve expressed the need for a 5-7-year pre-construction baseline study. Without a true baseline study, we will have a very hard time measuring the effects that construction and operation will have on the habitat and species that reside in the wind energy area.	In light of the three seasons of benthic community surveys (2016, 2017, 2018), BOEM believes that additional years of baseline study are not essential. However, post-construction monitoring of benthic communities and commercial fish species would be part of the proposed Project. Section 3.2.2 of the FEIS has been updated for a discussion of benthic habitat, species, and monitoring. Refer to Section 3.3.2 of the FEIS for fisheries monitoring.
0088-009	In describing the average revenue by fisheries, the DEIS states that “Exposure is defined as the potential for an impact from WEA development if a harvester opts to no longer fish in the area”. The industry has explained many times that this is a safety issue, NOT a simple choice to no longer fish in the area. We’ve advocated for an E/W layout which would have alleviated some of the negative impacts on the fishing industry.	The section to which this comment refers has been removed. The preference for the east-west layout is acknowledged, and Section 2.5 of the FEIS provides BOEM’s preferred alternative.
0088-010	“BOEM anticipates the cumulative impacts under Alternatives B, C, D1, D2, and E when combined with the past, present, and reasonably foreseeable future activities, to be the same as the Proposed Action: minor adverse impacts, as well as minor beneficial impacts on scientific research and surveys.” I’ve attended several meetings where staff from the New England Fishery Science Center specifically told BOEM and/or Vineyard Wind that the surveys will be extremely difficult to impossible to carry out within the wind energy area. NEFSC staff mentioned that they will have to design new survey methods in order to continue to operate within the wind farms, but that those new methods would take years to develop. Years that will have missing data from survey reports, creating scientific uncertainty that will surely end up negatively impacting the industry.	Section 3.12 of the FEIS has been updated to identify potential impacts on scientific surveys. Section 3.2 of the FEIS has been revised to discuss the benthic monitoring plan outlined in COP Volume III, Appendix III-D (Epsilon 2020c). This plan includes a pre-construction survey and post-construction surveys for three nonconsecutive years, which would allow monitoring and assessment of benthic recovery in the WDA and along the OECC.
0088-011	We’ve [fishing industry and science communities] attended one on one meetings, workshops, submitted comments and even shared confidential fishing data. However, it’s been very troublesome to see both the science and fishing communities’ concerns dismissed throughout this DEIS and much of this process. The potential negative effects this project might have on the benthic habitat, the species that reside there, and the industry that has been making a living there for decades seems to be devalued in many areas of this report...The industry has been asking for this process to be slowed down to make sure that it’s done right for both industries to thrive and survive.	Section 3.10 of the FEIS has been revised to include new data and additional analysis. Additional revisions have been made in Sections 3.1 through 3.4 of the FEIS. Section 3.2.2 of the FEIS has been updated for a discussion of benthic habitat, species, and monitoring. Refer to Section 3.3.2 for fisheries monitoring.
0089-001	To the greatest extent possible, BOEM regulatory oversight of this project should facilitate local benefit for host communities in the form of dollars for energy conservation and efficiency programs. Renewable energy projects are not without environmental costs... While we support this project in concept, we would like to see it ...initiate and underwrite additional community benefits that promote	The additional measures requested by this comment are not necessary to evaluate the potential social and environmental impacts of the proposed Project. Further revisions to the FEIS were not warranted.

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	energy conservation and improved efficiency in its many forms: from earmarking dollars for non-polluting transportation and improving efficiency of machines, to improving energy efficiency of homes and businesses.	
0090-001	We request an extension to the comment period for public review of the Draft Environmental Impact Statement (EIS) and Construction and Operation Plan (COP) for the Vineyard Wind project offshore Massachusetts (Lease OCS-A 0501). Given the government shutdown, we have been unable to access all necessary resources to inform this review process.	The public comment period for the DEIS for the Vineyard Wind Project was extended until February 22, 2019 due to the government shutdown. Furthermore, BOEM rescheduled the five public meetings and they were held on February 11, 12, 13, 14 and 15, 2019. Appendix C (formerly Chapter 4) of the FEIS was updated with this information as well as information regarding the virtual public meetings that were held during the SEIS public comment period.
0090-002	In the biological assessment (BA) conducted by the US Fish and Wildlife Service (USFWS), the Service outlines conditions to “minimize or eliminate potential impacts on ESA-listed species of birds and bats” (p. 29). One of these conditions is to “develop a framework for a post-construction monitoring program for birds”. It is imperative that approval of this project be withheld until such a monitoring program is disseminated for public comment.	No additional monitoring or mitigation measures relative to birds were included in the FEIS. However, additional mitigation and monitoring measures may arise from consultations and coordination with Federal and State resource agencies. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision. Section A.8.3 in Appendix A and Appendix D of the FEIS have been updated to include the mitigation and monitoring that has been proposed for the agency-preferred alternative.
0090-003	Once a monitoring plan [for birds] becomes available and the EIS is complete, the review process will require additional time allotted by BOEM under NEPA.	No additional monitoring or mitigation measures relative to birds were included in the FEIS. However, additional mitigation and monitoring measures may arise from consultations and coordination with Federal and State resource agencies. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0090-004	Other deficient aspects of the COP and EIS are the proposed avoidance, minimization and mitigation measures. While some minimization technologies are under development, many have already been implemented in the offshore realm, and should at the very least be tested by Vineyard Wind.	No additional monitoring or mitigation measures relative to birds were included in the FEIS. However, additional mitigation and monitoring measures may arise from consultations and coordination with Federal and State resource agencies. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision. Section A.8.3 in Appendix A and Appendix D of the FEIS have been updated to include the mitigation and monitoring that has been proposed for the agency-preferred alternative.
0090-005	The EIS states “the species with the highest estimated risks were the Herring Gull (<i>Larus argentatus</i>), Great Black-backed Gull (<i>Larus marinus</i>), Razorbill (<i>Alca torda</i>), Cory’s Shearwater (<i>Calonectris borealis</i>), and Black-legged Kittiwake (<i>Rissa tridactyla</i>)...” (p. 3-34)... ..we are particularly concerned about Black-legged Kittiwakes, because they have shown large circumpolar declines over the last few decades ¹ . They have also shown high collision and displacement vulnerability scores (Willmott et al. 2013 2)... All of these species are relatively large-bodied and thus make good candidates to be monitored by targeted detection-and-curtailment systems ³ .	Section A.8.3.2 in Appendix A of the FEIS has an updated discussion of collision risk and displacement sensitivity. Furthermore, Section A.8.3 and Appendix D of the FEIS have been updated to include the mitigation and monitoring that has been proposed for the agency-preferred alternative, in particular for bird-specific measures. Pre- and post-construction monitoring plans, if required, will be developed in coordination with the USFWS during the course of ESA consultation. Additional mitigation and monitoring measures may arise from consultations and coordination with Federal and State resource agencies. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.

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0090-006	Along with the other bird species facing high risk from the Vineyard Wind project, they [Black-legged Kittiwakes are protected from take by the Migratory Bird Treaty Act (MBTA).	While the black-legged kittiwake is considered to be highly susceptible to collision effects, over all seasons, the species is expected to have unlikely exposure to operating WTGs. BOEM is relying on the current view of the Migratory Bird Treaty Act, as outlined in the Solicitor’s Opinion M-37050, The Migratory Bird Treaty Act Does Not Prohibit Incidental Take, that limits the scope of the Act to purposeful take of migratory birds.
0090-007	We are additionally concerned that the risk to some species of concern (e.g., Northern Gannets) has been underrepresented in the COP. Vineyard Wind determined which species were at highest risk of exposure to the project by relying heavily on two data sources. They conducted a rigorous effort-corrected analysis of the MassCEC data but also used data from the Marine-life Data and Analysis Team (MDAT), without providing detailed site-specific effort information. The MDAT data were based on Winship et al. (2018 4), which modeled and mapped the relative density of marine birds on the Atlantic Outer Continental Shelf, using three decades of aerial and boat-based visual surveys at sea. It would be useful to see the proportion of these surveys that sampled the Vineyard Wind Energy Area.	The Vineyard Lease area (OCS-A 0501) was sampled approximate 49 times from 2007 to 2015; 30 of those surveys were conducted by MassCEC. Those surveys were used in the predictive model, which was used in the EIS analysis.
0090-008	Furthermore, advancements in digital aerial survey technology in the last couple of years have shown that many collision and displacement vulnerability scores are likely to be even higher than estimated in previous studies, particularly for gannets and terns. Johnston and Cook (2016 5) have shown that boat surveys underestimate flight heights, where over 50% of terns and gannets are estimated within the rotor swept zone (RSZ) in digital aerial surveys, compared to less than 15% of both species observed in the RSZ during boat surveys (see Table 2 of report). This underestimation of flight heights in boat surveys has been additionally validated with the use of drones (Harwood et al. 2018 6). Given the paucity of information on flight heights that is specific to the proposed site, a scientifically rigorous monitoring plan will be necessary to adequately minimize and mitigate birds at risk of collision and displacement.	No additional monitoring or mitigation measures relative to birds were included in the FEIS. However, additional mitigation and monitoring measures may arise from consultations and coordination with Federal and State resource agencies. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision. Section A.8.3 and Appendix D of the FEIS have been updated to include the mitigation and monitoring that has been proposed for the agency-preferred alternative.
0090-009	We are considering a combination of the proposed Alternatives, but require an extension of the comment period, as well as further information in the subsequent draft of the EIS.	The public comment period for the DEIS for the Vineyard Wind Project was extended until February 22, 2019 due to the government shutdown. Furthermore, BOEM rescheduled the five public meetings and they were held on February 11, 12, 13, 14 and 15, 2019. Appendix C (formerly Chapter 4) of the FEIS was updated with this information as well as information regarding the public meetings held during the SEIS public comment period.
0090-010	According to the USFWS BA, disturbance would be minimized by the time-of-year restrictions on cable installation [for Alternative B]. The BA states “the Proposed Action will comply with required time-of-year restrictions during cable installation where no in-water work that produces silt will occur from January 15	Section A.8.3 in Appendix A of the FEIS includes an updated discussion of mitigation measures for terns and piping plovers. Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. Additional mitigation and monitoring measures may arise

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	to May 30, and jet plowing will only occur from June 1 to January 14” (p. 24). However, this is not specified explicitly in the EIS - we request further clarification of the risks to these species for both [cable landing] sites. Appendix D specifies restrictions on the Covell’s Beach site from 1 Apr – 31 Aug (to avoid disturbing shorebirds), and during low tide at Lewis Bay from mid-Jul to mid-Sep (to avoid impacting foraging resources of terns, although species are not specified on p. 3-34 of the EIS). We support this proposed mitigation, and recommend that the benefits to each bird species (Piping Plovers and Least, Common and Roseate Terns) be further discussed and included in Alternatives A and B.	from consultations and coordination with Federal and State resource agencies. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision. No additional mitigation or monitoring measures relative to birds were included in the FEIS. A detailed discussion of potential impacts as well as potential benefits of proposed mitigation measures to ESA-listed species is provided in the Biological Assessment, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ .
0090-011	Alternative C would move the 6 northern turbines to the south side of the project. This could help reduce the exposure of sea ducks such as White-winged Scoters (COP Appendix III-C, Fig. 120). Alternative C could also reduce the exposure of Roseate Terns (COP Appendix III-C, Fig. 97), as could Alternative E..	Section A.8.3.3 in Appendix A of the FEIS includes a discussion on effects on birds from Alternative C. No changes to the FEIS were warranted. While Alternative C would result in slightly lower exposure risk to sea ducks and roseate terns, impacts ratings as described in the DEIS and FEIS would not be expected to be significantly different. Section A.8.3.4 in Appendix A of the FEIS has an updated discussion of impact on bird species from Alternative E. In addition, Section A.8.3 of the FEIS includes a discussion of effects to birds from the agency-preferred alternative.
0090-012	Alternative E increases the rotor height from 27-191m (8 MW turbines) to 31-212m (10 MW turbines). There is a chance that increasing the lower limit of the rotor height to 31m would reduce the collision risk of Roseate Terns, by avoiding their dominant flight heights. A Loring et al. study (in review) should be able to provide more information on this (see Loring et al. 20177 annual report), however, the final report has been delayed for release due to the government shutdown.	A discussion of Loring et al. 2019 relative to Roseate Tern flight heights is discussed in Section 3.1 of the Biological Assessment submitted to USFWS, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ .
0090-013	Loring et al. (2018 8) published a study funded by BOEM, which shows a couple of occasions where two federally Threatened rufa Red Knots cross over the Vineyard Wind footprint, at altitudes within the rotor swept zone (Fig. F-17, 18). These crossing events occurred in mid-November (17th -18th). The BA states that, in the Loring et al. unpublished study, “three plovers (7% of 43) [flew] over the Vineyard Windlease area during fall migration” and that 97.7% of plovers fly outside of the rotor zone (i.e., 2.3% within); however, more information is needed on the time of year and the rotor height of those specific individuals that crossed the footprint. Additionally, the BA conducted a collision risk assessment using high avoidance rates that are not supported by the literature: 98% for Piping Plovers and Red Knots – these values need to be justified...further collision risk modeling (including for Roseate Terns) using more conservative values is necessary to justify whether an incidental take permit should be required for the Threatened and Endangered species exposed to the Vineyard Wind project.	A discussion of Loring et al. 2018 is provided in the Biological Assessment, submitted to USFWS which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ . To date avoidance rates have not been measured for piping plovers and red knots. The guidance issued by Scottish Natural Heritage (2018) recommends using 98 percent as a default avoidance rate for species that are not on a list of key bird species commonly identified in wind farm environmental statements. The analysis has been updated and uses a range of avoidance rates from 95 percent to 99.5 percent.

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0090-014	Given that the Vineyard Wind project falls in the flight paths of migrating Red Knots, Piping Plovers, and Roseate Terns, the EIS needs to provide certainty on how take will be minimized, from collisions, habitat displacement/loss, and cumulative impacts. Effective mitigation and compensation actions should also be considered for breeding, winter and non-breeding roost sites (see Mitigation section below): for example, establishment of protected areas, predator control, and habitat restoration (as has recently occurred at Bird Island in Marion, MA, Buzzards Bay, one of the largest breeding colonies of Roseate Terns 9).	A discussion of collision (Section 4.2.1.6) and displacement (Section 4.2.2) impacts on Rufa Red Knots, Piping Plovers, and Roseate Terns is discussed in the Biological Assessment submitted to USFWS, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ . Section A.8.3 in Appendix A of the FEIS includes a discussion on listed species, and a discussions of effects for each alternative. Please also refer to Section A.8.3 in Appendix A and Appendix D of the FEIS for the monitoring and mitigation that has been proposed for the agency-preferred alternative.
0090-015	A transparent, multi-year monitoring, minimization, and mitigation plan, involving scientifically rigorous study (e.g., before-after-control-impact) is critically needed to assess and minimize impacts on at-risk bird populations. Such a plan should be overseen by the federal and state agencies with affected natural resources (e.g., USFWS, MassWildlife), consistent with the Coastal Zone Management Act.	Section A.8.3 in Appendix A and Appendix D of the FEIS have been updated to include the mitigation and monitoring measures that would be implemented to avoid, minimize, and mitigate adverse impacts on birds.
0090-016	Deepwater Wind is currently implementing a post-construction Block Island Avian and Bat Monitoring Plan, which presents a minimum standard on which to establish a management plan for Vineyard Wind.	Vineyard Wind is developing a framework for an avian and bat post-construction monitoring program that will be developed and implemented in coordination with applicable Federal and State resource agencies.
0090-017	American Bird Conservancy supports wind power development when it is bird-smart, which means following six principles: (1) proper siting of turbines away from high-bird-collision-risk areas; (2) independent, transparent pre-and-post-construction monitoring of bird impacts; (3) effective construction and operation minimization of bird mortality by wind energy facilities; (4) mitigation to compensate for any unavoidable bird mortality and habitat loss from wind energy development; (5) evaluation of wind energy as part of a complete analysis on all feasible renewable alternatives; and (6) environmental compliance with a rigorous local, state, and federal regulatory framework.	Section A.8.3 in Appendix A and Appendix D of the FEIS have been updated to include the mitigation and monitoring measures that would be implemented to avoid, minimize, and mitigate adverse impacts on birds.
0090-018	Organization of an independent avian stakeholder advisory group is key to the regional planning process. An independent avian stakeholder advisory group should be charged with a variety of tasks throughout the wind energy planning and operation process. This group makes informed decisions about the potential impacts of offshore wind energy development, contributes to the NEPA process, encourages regional planning, and establishes mandatory guidelines and best management practices. It also helps to identify knowledge/data gaps, interpret	Thank you for your comment.

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	data, methods, and results from the monitoring plan, and assess cumulative impacts. The group provides transparency by disseminating data and results to public, and also ensures multi-agency oversight. It should assess the need for incidental take permits, recommend adaptive management of operations, and help to develop and implement the mitigation fund... We highly recommend that the BOEM Intergovernmental Renewable Energy Task Force establish such an advisory group.	
0090-019	the COP and EIS are incomplete without a transparent, scientifically rigorous monitoring, minimization, and mitigation plan. The monitoring, minimization, and mitigation plan should be approved by a non-affiliated avian stakeholder advisory group, with state and federal agency oversight.	Section A.8.3 in Appendix A and Appendix D of the FEIS have been updated to include the mitigation and monitoring measures that would be implemented to avoid, minimize, and mitigate adverse impacts on birds. A framework for post-construction monitoring program for birds and bats will be developed in coordination with applicable Federal and State resource agencies. Additional monitoring or mitigation measures relative to birds were included in the FEIS.
0090-020	Long term (>5 years) pre- and post-construction studies need to follow “Before, After – Control, Impact” or “Before-After Gradient” protocols (i.e., with appropriately-selected control plots adjacent to the Vineyard Wind for comparison). Such studies should be conducted independently from the developer (i.e., supported through a bird mitigation fund) and be systematically designed to accurately and precisely quantify the collision and displacement vulnerability of protected birds to offshore wind energy development. Mortality estimates need to be submitted to the overseeing agencies (e.g., USFWS, MassWildlife) and detection-and-curtailment systems installed (for larger bird species, such as kittiwakes and gannets), along with deterrent technology.	Section A.8.3 in Appendix A and Appendix D of the FEIS have been updated to include the monitoring and mitigation that has been proposed for the agency-preferred alternative. A framework for post-construction monitoring program for birds and bats will be developed in coordination with applicable Federal and State resource agencies. Additional mitigation or monitoring measures and/or modifications to existing mitigation and monitoring measures may be adopted in the ROD as a result of ongoing ESA Section 7 consultation with USFWS.
0090-021	We also recommend that Vineyard Wind follow an adaptive management plan based on the results of the monitoring, minimization, and mitigation plan (see ABC’s comments on BOEM’s EA). This needs to include the reassessment of a Section 7 ESA consultation (i.e., determining the likelihood for adverse effect).	Section A.8.3 in Appendix A and Appendix D of the FEIS have been updated to include the monitoring and mitigation that has been proposed for the agency-preferred alternative. A framework for post-construction monitoring program for birds and bats will be developed in coordination with applicable Federal and State resource agencies. Additional mitigation or monitoring measures and/or modifications to existing mitigation and monitoring measures may be adopted in the ROD as a result of ongoing ESA Section 7 consultation with USFWS.
0091-001	We were encouraged that the Draft Environmental Impact Statement found that most of the environmental impacts of this project will be negligible or of minor negative impact. Given the seriousness of what we know is coming if we do not end fossil fuel emissions, the risks of this project seem very small, and the positive potential--both of the power the project would generate and the precedent it would set for offshore wind development in New England--is great.	Thank you for your comment.
0092-001	Massachusetts is committed to advancing the procurement of 1,600 megawatts (MW) of cost-effective offshore wind energy by 2027 as part of the 2016 Energy	Thank you for your comment.

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	Diversity Act. Part of this procurement is the Vineyard Wind project which is now undergoing permitting.	
0092-002	For the purposes of protecting resources within Lewis Bay that would potentially be impacted by cable installation, we also strongly support Covell’s Beach cable landfall route as the preferred alternative to the New Hampshire Avenue landfall.	As specified in Section 2.1 of the FEIS, the DEIS, and SEIS contemplated two Onshore Export Cable Routes (OECRs), with alternative options within each route; however, since the publication of those documents, Vineyard Wind has stated all necessary state and local permits for the Covell’s Beach landfall location have been acquired. Therefore, the Proposed Action (Alternative A) and action alternatives only contemplate the one landfall location, Covell’s Beach landfall and onshore route. Alternative B therefore is no longer evaluated as an action alternative in this FEIS. In addition, Section 2.5 of the FEIS has been included to identify the agency-preferred alternative.
0092-003	ESA- and MESA-listed terns forage in the waters surrounding Massachusetts during the nesting, staging, and migratory seasons...Post-breeding tern aggregation areas (“staging areas”) include the beaches of Cape Cod, Martha’s Vineyard, and Nantucket where terns prepare for southern migration (July through late September). These post-breeding staging areas can include the majority—and potentially all—of the North American Roseate Tern population...The DEIS, COP and BA collectively assess potential impacts of the proposed Vineyard Wind Project (including construction, operations, maintenance, and decommissioning). The BA concludes that effects are insignificant and discountable and thus, “not likely to adversely affect” ESA-listed bird species...However, the DEIS, COP and BA do not provide sufficient evidence to support these conclusions. Several previous studies that run counter to the conclusions drawn above were not included... As a result, the DEIS does not fully account for increased mortality risk and other negative impacts to ESA- and MESA-listed bird species associated with the Project. Based on a review of the available information, the Division anticipates that the construction, operation, maintenance and decommissioning of Wind Turbine Generators (WTGs) will result in an increased risk of direct mortality to ESA- and MESA-listed birds.	The Biological Assessment submitted to USFWS can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ . The Biological Assessment includes a discussion of potential impacts associated with the construction, operation, and eventual decommissioning of the proposed Project. Roseate Terns are not expected to encounter operating WTGs and as such are not expected to be subject to increased risk of mortality due to collision. Using the Band Collision Risk Model, the estimated mortality rate for migrating Rufa Red Knots and Piping Plovers was zero.
0092-004	Based on limited and unpublished data, the BA concludes that “... any migrating terns passing through the action area are likely to be flying during good weather conditions and below the rotor swept zone.” However, the best available science indicates that terns do fly within the rotor swept zone (RSZ) (Everaert and Stienen 2006; Vlietstra 2008) and frequently travel and forage in limited visibility conditions (C. Mostello, Coastal Waterbird Biologist, MA Division of Fisheries and Wildlife, personal observations). If terns used the Wind Development Area (WDA) for foraging only, tern flight heights would indeed be expected to be below the RSZ. However, because the majority of terns passing through the WDA will be doing so during migration, it is likely that more higher-altitude	The referenced Loring et al. (2019) paper has been published since publication of the DEIS and current Biological Assessment submitted to USFWS. While terns (family Sternidae) may use the WDA and may fly within the RSZ, the analysis in the Biological Assessment submitted to USFWS is limited to the federally Endangered Roseate Tern, which typically fly below the RSZ, as shown in Loring et al. (2019). No tracked roseate terns entered the Proposed WDA during the Loring et al. (2019) study, which included the post breeding dispersal period. Section A.8.3 in Appendix A of the FEIS includes a discussion on listed species, and a discussions of effects for each alternative. The Biological Assessment

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	“travel” flights will occur within the RSZ. Additionally, the BA states that tern “collision with WTGs is unlikely because terns are agile fliers and can easily avoid WTGs.” Although terns are agile fliers, collisions with wind turbines have been recorded (Everaert and Stienen 2006).	submitted to USFWS can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ .
0092-005	The BA states that “[t]he Distance from shore... and the lack of suitable habitat...precludes use by...foraging roseate terns.” However, the WDA can provide suitable habitat for listed terns, including foraging, resting, and migratory habitats. The Vineyard Wind Spring Tern Survey (Appendix III-O) prepared by Biodiversity Research Institute (BRI) observed state-listed terns flying, resting/sitting, and foraging within the WDA. Although Roseate Terns were not confirmed, the BA does not acknowledge the possibility that 5 of its unidentified tern observations, or a portion thereof, could be Roseate Terns.	While terns (family Sternidae) may use the WDA and may fly within the RSZ, the analysis in the Biological Assessment submitted to USFWS is limited to the federally Endangered Roseate Tern, which typically flies below the RSZ. While there is some potential that these unidentified tern were in fact roseate terns, given the life history and ecology of the species, fatal interaction with operating turbines are not expected. Further discussion of the expected impacts on roseate terns is provided in the Biological Assessment, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/
0092-006	For Piping Plovers, the BA states that (p. 23) “...Piping Plovers... do not nest in either of the two potential landfall sites.” However, the Division’s records document that Piping Plovers have utilized Covell’s Beach (Barnstable, MA) for nesting since 2007 and have utilized adjacent beaches since the early 1980’s. Ideally, work activities within nesting habitats should be avoided or minimized during the nesting season. Should cable installation occur during the nesting season the DEIS, COP and BA should thoroughly detail avoidance and minimization measures that will be taken to reduce potential impacts to nesting Piping Plovers and their habitats.	No nesting piping plovers at Covell’s beach have been documented based upon review of Annual Massachusetts Piping Plover censuses. In 2011, a piping plover pair nested on Craigsville Beach, but traveled to Memorial/Covell’s Beach. No nesting piping plovers were observed at Memorial/Covell’s Beach during the years of 2009 through 2017.
0092-007	The BA states that “no roseate terns were detected in the proposed offshore Action Area during previous offshore survey efforts” (Section 3.1). However, Veit et al. (2016) performed aerial surveys in federal lease areas south of Nantucket and Martha’s Vineyard (including portions of the proposed WDA) and observed one or both species within and adjacent to the proposed WDA (with highest concentrations during spring migration; they did not distinguish between Common and Roseate Terns). In addition, BRI (Appendix III-O) reported 18 Common Terns and 5 unidentified terns flying, foraging, and sitting on the water in its April and May 2018 boat-based surveys of the proposed WDA.	While terns (family Sternidae) may use the WDA and do fly within the RSZ, the analysis in the Biological Assessment submitted to USFWS is limited to the federally Endangered Roseate Tern, which typically flies below the RSZ.
0092-008	The BA states that “...very little Roseate Tern activity is expected to occur within marine waters in and around the Action Area ... based on a statistical model that used 354 roseate tern sightings throughout the Atlantic ... to predict Roseate Tern presence” (Section 3.1). The authors of this model (presumably the Marine-life Data and Analysis Team “MDAT” [Curtice et al. 2016]) rated model quality for the Roseate Tern as Fair to Poor, depending on season; for the Common Tern, Fair to Good; and for the Least Tern, Fair. However, the BA does not acknowledge that the model being relied upon to assess risk for ESA- and MESA-listed bird species is of limited applicability...models that rely solely on	The results from MDAT model is just one source of information. The region has been extensively survey and no roseate terns were identified in the proposed turbine area. While terns (family Sternidae) may use the WDA and may fly within the RSZ, the analysis in the Biological Assessment submitted to USFWS is limited to the federally Endangered Roseate Tern, which typically flies below the RSZ. A discussion of the potential for Roseate Terns to encounter operating WTGs is discussed in the Biological Assessment, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ .

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	<p>relatively sparse offshore data are compromised. Notably, as detailed by the BRI survey report (Appendix III-O), terns have been observed within the WDA during April and May, and have utilized the WDA for migration, resting, and foraging. The BRI data referenced in the BA demonstrates seasonal exposure to the WTGs that could significantly increase mortality risk for listed terns. Therefore, neither the BA nor the MDAT analysis appears to fully or accurately integrate all available data.</p>	
0092-009	<p>However, the COP’s Exposure Assessment methodology is not appropriate for listed terns, especially Roseate Terns, because the MDAT model performed poorly for these species and the Veit et al. (2016) surveys did not distinguish between Common and Roseate Terns. Further, the Exposure Assessment produced annual average exposure scores (averaging each seasonal risk) for migratory species, which is likely to artificially lower the “risk” for migratory species because they are not present within a project area for one or multiple seasons each year. The Exposure Assessment did not account for increased sensitivity of listed species, given that the global population size for these species is reduced relative to more common species. This is particularly true for the Roseate Tern, Least Tern, and Piping Plover... In the case of ESA- and MESA-listed species in particular, exposure and risk assessments should consider effects on individuals, (i.e. “take”) not just the relative importance of a project site for a species/group.</p>	<p>It is not correct for the commenter to state that species were pooled in the MDAT models. Only observations that were identified to species were used in the MDAT models data used in the MDAT models. While terns (family Sternidae) may use the WDA and may fly within the RSZ, the analysis in the Biological Assessment submitted to USFWS is limited to the federally Endangered Roseate Tern, which typically flies below the RSZ. A discussion of the potential for Roseate Terns to encounter operating WTGs is discussed in the Biological Assessment, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/.</p>
0092-010	<p>Robinson Willmott et al. (2013) provide an example of a risk assessment methodology that is more appropriate to ESA- and MESA-listed tern species. Robinson Willmott et al. (2013) assessed relative vulnerability of marine birds to offshore wind projects on the Atlantic Outer Continental Shelf (AOCS) through an evaluation of population sensitivity, displacement sensitivity, and collision sensitivity.</p>	<p>Section A.8.3.2 in Appendix A of the FEIS includes an updated discussion of species that may be sensitive to collision or displacement effects. Also, Figures A.8.3-1 and A.8.3-2 in Appendix A of the FEIS depict modeled use of the offshore portion of the proposed Project area by birds with high collision and/or displacement sensitivity, as defined by Robinson Willmott et al. (2013).</p>
0092-011	<p>Based on the fact that Common Terns – and very likely, Roseate Terns, Arctic Terns, and Least Terns – seasonally migrate across and feed within the WDA and travel in poor visibility conditions, listed terns are likely to collide with WTGs constructed there. The magnitude of the collisions is uncertain, but it would be expected to increase as the number of wind facilities constructed in the WEA increases. Even small numbers of adult fatalities can compromise population stability, particularly for species with limited population size. The Endangered Roseate Tern, with its limited population size and considerable population volatility over the past 30 years (USFWS and MassWildlife, unpublished data), would be particularly vulnerable in this regard. Therefore, the BA should address the potential for cumulative impacts to ESA- and MESA-listed birds as a result of the Project and, to the extent practicable, consider anticipated future wind development in the WEA.</p>	<p>A discussion of the potential for Roseate Terns to encounter operating WTGs is discussed in the Biological Assessment submitted to USFWS, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/.</p> <p>Loring et al. (2019) showed that Roseate terns fly offshore only when visibility is greater than 3.1 miles (5 km) and that they fly between 36-65.6 feet (11-20 m) above the water, below the RSZ. Based on the behavioral and foraging ecology, the telemetry data, the survey data, very little, if any, Roseate Tern activity is expected within marine waters in and around the offshore portion of the proposed Action Area and should birds pass through the area they will be flying relatively close to the ocean surface during good weather conditions.</p>

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		Section A.8.3 in Appendix A of the FEIS includes a discussion on listed species, and a discussions of effects for each alternative.
0092-012	The loss of individual ESA- and MESA-listed marine mammals and sea turtles are appropriately considered in the DEIS to be “irreversible and irretrievable impacts.” As a result, the proactive minimization and mitigation measures included in the DEIS to address any marine mammal impacts are appropriate. This is in large part because projects that might lead to even minor increases in adult mortality can compromise the long-term viability and recovery of a listed species.	Thank you for your comment.
0092-013	Overall, the Roseate Tern and other MESA-listed avian species warrant similar assessment and consideration relative to ESA- and MESA-listed marine mammals and sea turtles, especially given the limitations of the BA/DEIS’s risk assessment and the conclusions of Robinson Willmott et al. (2013). Adult mortality for Roseate Tern and other MESA-listed tern species, and the cumulative effects of such mortalities on the long-term viability of these species, should not be considered “negligible” or “minor.” Given the probability of listed tern mortality resulting from the Project and the likelihood of future expansions of Vineyard Wind’s facility (and other future wind facilities) within the WEA, mitigation is appropriate to ensure that individual losses are offset and populations of the affected bird species benefited...The Supplemental DEIS or FEIS should include the development and integration of suitable, reasonable conservation measures to benefit populations of the affected bird species and mitigate any unavoidable Project impacts. We respectfully request that the Project proponent consult with the Division in evaluating potential mitigation measures, including but not limited to support for ongoing tern colony monitoring and management and or the restoration and enhancement of critical colony nesting habitats. These actions would provide meaningful and measurable benefits to the Roseate Tern and, because listed terns typically nest in mixed species colonies, would necessarily also benefit other state-listed tern species.	Section A.8.3.2 in Appendix A of the FEIS includes an updated discussion on potential for collision and displacement. In addition, Figure A.8.3-2 depicts modeled use of the offshore portion of the proposed Project area by bird species with high displacement sensitivity. A framework for post-construction monitoring program for birds and bats will be developed in coordination with applicable Federal and State resource agencies. Additional mitigation or monitoring measures and/or modifications to existing mitigation and monitoring measures may be adopted in the ROD as a result of ongoing ESA Section 7 consultation with USFWS.
0092-014	In addition, the DEIS mentions only one minimization measure (bird deterrent devices, not described) to reduce bird collisions. There may be additional minimization measures that could reduce bird mortality through increasing turbine visibility. For instance, contrasting paint colors or phosphorescent paint could be used on portions of turbine blades and monopoles, implemented experimentally or as part of an adaptive management framework. Because the WTGs would be far from shore, increased turbine visibility should not result in major visual impacts to humans and may also benefit vessel operators. We therefore recommend that other potential minimization measures be developed and evaluated as part of a Supplemental DEIS or FEIS.	Section A.8.3 in Appendix A and Appendix D of the FEIS have been updated to include the monitoring and mitigation that has been proposed for the agency-preferred alternative. A framework for post-construction monitoring program for birds and bats will be developed in coordination with applicable Federal and State resource agencies. Additional mitigation or monitoring measures and/or modifications to existing mitigation and monitoring measures may be adopted in the ROD as a result of ongoing ESA Section 7 consultation with USFWS.

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0092-015	Similarly, the Supplemental DEIS or FEIS should include and describe a monitoring plan to provide additional information on bird collisions and/or displacement resulting from the Project. A robust monitoring plan is crucial for informing adaptive management efforts and guiding future expansions of Vineyard Wind’s facility (and other future wind facilities) within the WEA.	Section A.8.3 in Appendix A and Appendix D of the FEIS have been updated to include the monitoring and mitigation that has been proposed for the agency-preferred alternative. A framework for post-construction monitoring program for birds and bats will be developed in coordination with applicable Federal and State resource agencies. Additional mitigation or monitoring measures and/or modifications to existing mitigation and monitoring measures may be adopted in the ROD as a result of ongoing ESA Section 7 consultation with USFWS.
0092-016	Additionally, the changes in finfish abundance may also impact listed terns, especially the Roseate Tern, a sand lance specialist. It is expected that there will be changes in bottom type over a substantial area of the seafloor as a result of the proposed Project, including changes from sandy bottom to rocky bottom across 35 acres... Additionally, electromagnetic fields from buried cables are predicted to negatively affect demersal species such as sand lance, a major prey item for all of Massachusetts’s nesting tern species. Noise from pile-driving, which will occur during the bird breeding season, is expected to have the largest consequences for small fish, particularly those with swim bladders, such as herring and hake, which form a large portion of the diets of terns in Massachusetts (MassWildlife, unpublished data). Massachusetts’ tern populations swell during the post-breeding period (July through September) when Common, Roseate, and Arctic Terns from outside the state arrive to feed on the abundant small fish in the Massachusetts waters while they are readying themselves for migration. Changes in abundance or species composition of prey fish could have consequences on carrying capacity and pre-migratory fitness. This may be particularly true for the Roseate Tern population, all or nearly all of which stage on Cape Cod, Martha’s Vineyard, and Nantucket before migration (Jedrey et al. 2010). Therefore, it is recommended that the BA, and Supplemental DEIS or FEIS, address the loss of forage fish resources on tern populations as a direct effect of the Project on terns.	<p>The Biological Assessment submitted to NMFS, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/, includes Figure 8 depicting sand lance and other small fish abundance during spring and fall that is concentrated in and around Nantucket Sound. Given the distance from the offshore WDA, no impacts on forage fish species are expected to occur.</p> <p>Section 3.3.2 of the FEIS includes an updated discussion on impacts on fish species; Section A.8.3 in Appendix A of the FEIS includes a discussion on listed species, and a discussions of effects for each alternative.</p>
0092-017	We recommend expanding the stakeholder process with regards to alignment (NE/SW versus E/W). Vineyard Wind has referred to consultations with fishermen, but there is no record of this process, and other fishermen have publicly supported the E/W layout... The FEIS should describe how transit lanes were identified and provide a map indicating where they are relative to WTGs.	Chapter 2 of the FEIS has been revised to describe the process for creating the navigational safety corridor. The preference for the east-west layout is acknowledged. It is known that 38.5 percent of trawling vessels for 2016-2018 were trawling in a roughly East/West orientation, and 48.1 percent of vessels trawled in a roughly Southeast/Northwest orientation. Vineyard Wind did not separate vessels by trawling or transiting, but found an overall strong vessel travel pattern of SE/NW. The east-west layout is one of the alternatives assessed, and information is included in the FEIS that assesses the directionality of commercial fisheries vessels.
0092-018	“Trawl and dredge vessels require a relatively large space between turbines to maneuver their gear, as the gear does not directly follow the vessel, fishermen have commented that a 1-nautical mile spacing between WTGs may not be	Section 3.10.2 of the FEIS has been revised. Hook and line anglers targeting large pelagics such as makos, threshers, bluefin tuna, etc., need to safely navigate around the base of the WTGs to avoid damage to gear or entanglement (Michael

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	<p>enough to safely operate. BOEM expects that disruptions to access or unavailability of fish as a result of the Proposed Action during operations and maintenance may be limited to pelagic fisheries and highly migratory species” (DEIS p. 3-184). Considering that the Proposed Action has WTGs spaced less than one mile apart, we recommend that BOEM clarify why it believes that only pelagic fisheries and highly migratory species, which are defined as squid and mackerel fisheries, will be excluded.</p>	<p>Pierdinock, Pers. Comm., September 19, 2018). Recreational anglers harvesting tunas, sharks, and billfish also noted that spacing of the WTGs could impact access to fishing locations due to the large size, strength, and swimming speed of larger species that require significantly more space to fight on rod and reel compared to other species.</p>
0092-019	<p>We recommend that information pertaining to this topic be provided from offshore wind farms in Europe. We believe the FEIS should include an analysis of the ability of gears to fish within a wind farm and the minimum spacing for WTGs to enable continued access for mobile fishing gear commonly used in the area (otter trawls, scallop dredges, and clam dredges which are described in Fishery Management Plans). This analysis will enable a better comparison of tradeoffs between the Proposed Action, Alternative D (1 mile spacing and/or E/W layout), and examining which turbines can be dropped if the Project goes forward with Alternative E (84 turbines instead of 100).</p>	<p>Sections 3.4.5 and 3.4.7 of the DEIS, informed in part by Vineyard Wind’s Navigational Risk Assessment, had already started to discuss the deployment of mobile fishing gear within the WDA. Section 3.10 of the FEIS has been revised to provide additional information related to the use of the Project area by vessels with the proposed Project layout and the potential difficulties deploying fishing gear in the WDA. Section 3.11.2 of the FEIS specifically addresses the ability of vessels to navigate within the Proposed Action’s WTG array, based on the Project’s Supplemental Navigation Risk Assessment (COP Volume III, Appendix III-I, Epsilon 2020a). Section 3.10.2 of the FEIS has been revised to include the following text: “Clam industry representatives stated that their operations require a minimum distance of 2 nautical miles between WTGs, in alignment with the prevailing tidal currents.” Section 3.10 also acknowledges that large fishing vessels could find it more challenging to travel through the WDA or deploy fishing gear in the WDA if spacing between WTGs is less than 1 nautical mile. Further, some recreational and for-hire users recommended spacing of more than 3 nautical miles for WTGs. However, it has been also noted that trawling vessels require 180-degree turning diameters between 0.16 nautical mile and 0.86 nautical mile in good weather and sea conditions (larger diameters would be required in poor weather and sea conditions). In addition, a formula from offshore wind farm and maritime navigation guidance developed by the Permanent International Association of Navigation Congresses found that the minimum fishing vessel channel widths of 0.33 nautical mile and 0.32 nautical mile were calculated for transiting and trawling vessels, respectively. BOEM concludes that maneuverability with the WDA would vary depending on the fishing gear and species targeted. Effects to navigational safety would be adequately mitigated as described in Section 3.10.2. In addition, with time, most fishermen would adapt to WTGs spacing and would be able to fish successfully in the WDA. Section 2.5 of the FEIS has been included to identify the agency-preferred alternative.</p>
0092-020	<p>We agree that a mitigation program will be necessary, but the details of the mitigation structure still need to be determined. Specifically, we are concerned about direct negotiations between the claimant and the lessee.</p>	<p>Section 3.10.2 and Appendix D of the FEIS have been revised to include additional information on fisheries mitigation measures.</p>
0092-021	<p>BOEM states NMFS survey methodology “may need to change” (DEIS p. 3-179) but does not further consider the challenges and potential broader impacts</p>	<p>The proposed Project would directly impact survey operations, including but not limited to the federal multi-species bottom trawl survey, the Surfclam/Ocean</p>

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	<p>associated with this impact. The NMFS bottom trawl survey provides critical information on the abundance, distribution, biology, and size structure of fish and invertebrate species throughout the Northeast and Mid-Atlantic. This time series of fisheries-independent data is utilized in the stock assessments of commercially and recreationally important species. ... Changes should be handled delicately and comprehensively, as alterations could have profound implications for the survey results and may lead to greater uncertainty within stock assessments. We recommend that the FEIS represent the full implication of the loss of trawl survey stations and a shift in its station selection process.</p>	<p>Quahog clam dredge survey, and the integrated benthic/sea scallop habitat surveys, by excluding certain areas within the WDA and along the cable routes from potential sampling area, and by requiring development of alternative survey methodologies and transit routes. Survey gear performance, gear efficiency, and availability may also be affected. Agencies such as the NMFS and NOAA would need to expend resources to update scientific survey methodologies to account for offshore wind development inside and outside the MA WEA.</p> <p>Accommodations for offshore wind farms could vary based on the final design of each project. Agencies would need to evaluate how changes in sampling area and methodologies may affect certainty and accuracy in stock assessments and fishing quotas (see Section 3.10 of the FEIS) across all stocks that may be affected. A benthic monitoring plan is outlined in COP Volume III, Appendix III-D (Epsilon 2020c), including a pre-construction survey and post-construction surveys for three nonconsecutive years, which would allow monitoring and assessment of benthic recovery in the WDA and along the OECC. Additional surveys to be conducted in the WDA are described in Appendix D of the FEIS.</p>
0092-022	<p>We requested that the DEIS consider whether the potential increase in angler activity in the WDA would require new or additional fishery management measures and potential socioeconomic impacts of those measures. The relevant statement we identified was “that Days-at-Sea allocations ‘may need to be revisited’” (DEIS p. 3-179). We recommend the FEIS explain how fisheries management actions can be taken to mitigate impacts to commercial and recreational fishermen and weigh the complexity of making such changes.</p>	<p>As addressed in Section 3.3 of the FEIS, the scour protection around the WTG foundations would likely attract forage fish as well as game fish, which could provide new opportunities for recreational anglers. Evidence from Block Island Wind Farm indicates an increase in recreational fishing near the WTGs (Smythe et al. 2018). However, the magnitude of benefits to recreational fishermen from the Vineyard Wind WTGs providing new structure for fish may be reduced due to the distance from shore (Starbuck and Lipsky 2013).</p> <p>Furthermore, the survey conducted by the Rhode Island University of commercial and recreational fishermen in the Block Island Wind Farm area found that recreational fishing increased in the vicinity of the wind turbines because the turbines served as artificial reefs that attracted a variety of fish and marine invertebrates. However, the increase in recreational fishing resulted in increased vessel traffic for commercial fishermen and concerns over damages to gear, as both industries continued to fish in the wind area. Based on impact assessment in Section 3.10.2 of the FEIS, it predicted that fishing in the WDA will continue but at a reduced rate as some fishermen would relocate to other fishing locations due to safety concerns. For those fishermen who continue to fish in the WDA, fishing compensation funds have been established by Vineyard Wind to compensate for lost gear. If fishing was to increase in the WDA, it is currently unknown how the Days-at-See fishing allocation may need to be revised.</p>

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0092-023	<p>Construction areas will be closed via “temporary safety zones,”... However, the COP states “the majority of the inter-array cable is expected to be installed via jet plowing after the cable has been placed on the seafloor” (COP Vol I p. 4-15). The exposed cable on the seafloor will impact fishermen who will be unable to fish the area while the cable is exposed whether or not the area has a “temporary safety zone” or not. Additional information clarifying the potential size and length of closure periods for the various cable laying methods (e.g., simultaneous lay and burial versus laying and then burying the cable) is needed.</p>	<p>As described in the revised Chapter 2 of the FEIS, inter-array cables will be buried beneath the seafloor at a target depth of up to 5-8 feet (1.5-2.5 m) (see Section 4.2.3.6 of the COP, Volume I for a description of inter-array cable installation). For the inter-array cables, the expected installation method is to lay the cable section on the seafloor and then subsequently bury the cable using a jet plow (this is referred to as “post-lay burial”). The jet plow technique is described above in Section 4.2.3.3 of the COP Volume I. Based on the preliminary project schedule provided in COP Volume I, the time between the start of inter-array cable laying and the end of inter-array cable burial would be approximately six months. The offshore export cable would be installed via simultaneous lay and bury.</p>
0092-024	<p>Cable laying across Nantucket Sound should avoid the spring season due to high concentrations of fishing activities and natural resource events (spawning and egg laying). Minimization and mitigation measures specific to this season should be identified if cable laying cannot avoid it.</p>	<p>Section 3.3.2 of the FEIS has been updated to clarify that Vineyard Wind has agreed to avoid cable installation in Nantucket Sound during springtime.</p>
0092-025	<p>Some Atlantic States Marine Fisheries Commission managed species, such as river herring, shad, and striped bass were not included in the EFH Assessment, which was the basis for determining impacts...River herring (alewife and blueback herring) and American shad overwinter in areas of southern New England, including the WDA (Bethoney et al. 2013). The DEIS considers impacts of the proposed Project on Atlantic herring and mackerel, which would be similar to impacts on river herring during marine migration. However, because blueback herring is currently a Candidate ESA species, the FEIS should specifically consider impacts from the Project on this species.</p>	<p>This document and the EFH Assessment (which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/.) do not specifically assess ESA Candidate Species or Species of Concern in the region that do not have designated EFH near the proposed Project area, nor does it specify likely effects on individual fish stocks, because Candidate Species and Species of Concern are not protected under the ESA; therefore, such species were not specifically assessed in the EFH Assessment. Furthermore, Candidate Species and Species of Concern are not afforded any more attention than non-listed species and have been treated similar to other species, which is common practice and industry standards. However, some of these species and stocks use habitat types present in the Project area. The revised Section 3.3.2 of the FEIS provides general descriptions of potential impacts on finfish, invertebrates, and EFH; an assessment of species-specific or stock-specific effects is outside of the scope of this document.</p>
0092-026	<p>The updated COP continues to depict fish biomass as the sum of the interpolated values in each grid cell. We recommend that section 6.6.1.1 (COP Vol III p 6-124) be updated to represent fish biomass in terms of the average weight per tow, which would help to normalize the figures in order to account for potential differences in trawl survey intensity amongst grid cells. We believe that using the sum of the interpolated fish biomass in each grid cell is not an appropriate way to assess fish abundance in the WDA and the adjacent habitats. The trawl survey coverage (i.e., number of tows) is unlikely to be equivalent across all grid cells in the WDA and adjacent areas.</p>	<p>BOEM acknowledges that the suggested method could provide finer detail regarding fish abundance in and near the WDA. However, the information mentioned is used in the EIS only to conclude in Section 3.3.6.1 of the DEIS that “Biomass is low across the WDA” or the conclusions regarding impacts in Section 3.3.6 of the DEIS or to provide better information to decision makers. The suggested method would not change this conclusion. Therefore, no further update to the EIS was warranted.</p>

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0092-027	We are concerned that the soft-start procedure, the only recommended mitigation for pile driving, may be insufficient to minimize harm to schooling fish or other fish sensitive to sound impacts. Fish kills should be monitored and a response plan in the event of a fish kill event should be prepared.	Section 2.2.1, Section 3.3.6.3, and Appendix D of the DEIS included a discussion of monitoring and mitigation proposed for the Project. Section 3.3.2 of the FEIS has been updated to provide additional information regarding the soft-start procedure and regarding the Fisheries Monitoring Plan. Additional monitoring requirements and mitigation measures, if any, (e.g., fish kill monitoring and compensation) will be developed in coordination with the NMFS and included in the Record of Decision.
0092-028	The importance and presence of the Southern New England (SNE) lobster resource is under-represented in the WDA in the DEIS... The lobster stock assessment (ASMFC 2015) indicates that ‘offshore’ SNE stock landings are now more important to the SNE area (partly illustrated in Fig 3.2.3.1.). This increased fleet dependence on the WEA region warrants further analysis of economic impacts. Lobster fishing activities are spatially constrained—individual fishers’ access is restricted by permitting rules as well as the territorial nature of pot gear fisheries—so estimates of lost revenue should be specific to the management area to which they are restricted (i.e., Area 2) and should not assume that relocation to new areas will be feasible. We recommend the FEIS include a better estimate of lost revenue that is specific to impacts to the Massachusetts and Rhode Island-based SNE fleet (inclusive of lobsters and Jonah crabs) and not be based solely on VTR data.	Additional information on the revenue and pounds landed from American Lobster relevant to the WDA was added to Section 3.10 of the FEIS.
0092-029	We disagree with the DEIS’s characterization of the importance of the project area to horseshoe crab fisheries. The DEIS states that “most of the catch comes from Cape Cod Bay” and “some minor fishing occurs in Nantucket Sound” (DEIS p. 3-174). Our data shows that more than 80% of landings come from Nantucket Sound with less than 10% derived from Cape Cod Bay (MA DMF 2016).	Section 3.10.1 of the FEIS has been revised for a discussion on catch rate and landings.
0092-030	The DEIS identifies hard bottom as a preferred habitat for Jonah crab and lobster and notes only “small amounts of hard-bottom habitat exist in the WDA and OECC” (DEIS p. 3-72). While hard-bottom may represent a preferred habitat type where it is available, lobsters regularly traverse and feed over soft bottom and can use sand and mud-depressions as shelter. Additionally, a recent study near the lease area (Collie and King 2016) reported high lobster catches in all surveyed bottom types. Jonah crabs actually prefer soft substrates. As noted in the DEIS, SRA 537 contains little hard bottom (1.4%), but accounts for approximately 70% of national Jonah crab landings.	Section 3.3.1 of the FEIS of has been updated to include the suggested study and clarifies preferred habitats for these species.
0092-031	We are concerned that the assessment of impact discounts potential sensitivities that slow moving invertebrates may have to sedimentation. In the Sediment Deposition section, Jonah crabs are described as mobile species that “would likely avoid or abandon deposition areas” (DEIS p. 3-76). We do not concur with	Section 3.3.2 of the FEIS clarifies that slow moving but mobile species would likely be able to uncover themselves.

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	this assessment. Jonah crabs often bury rather than disperse in response to threats and are slow moving with recent MA DMF tagging studies showing median dispersal of only 70 meters per day for adult males (MA DMF Unpubl. Data). Horseshoe crabs are also relatively slow and could have a similar level of impact from deposition.	
0092-032	Whelk are also likely to be impacted by cable laying activities as “significant” numbers of knobbed whelk as well as whelk egg cases were identified in video surveys along the cable route (COP Vol 2 p. 5-9). Impacts to whelk remain of particular concern given their commercial importance, prevalence along sections of the cable route area, and challenges in developing avoidance or impact minimization strategies as life stages are sensitive to burial during all months. We recommend that the FEIS provide an improved characterization of the spatial and temporal distribution of these species to provide a better understanding of their potential vulnerabilities.	Section 3.3.2 of the FEIS has been updated to clarify that whelks and their eggs are included in the discussion of potential impacts. There is no scientific information available regarding the spatial and/or temporal distribution(s) of whelks in Nantucket Sound and/or nearby waters.
0092-033	The DEIS is lacking information assessing impacts associated with shifts in distribution of species that prefer hard benthic structures. This assessment should consider potential economic (e.g., changes to fishing activities or management plans) as well as biological (changes in species distribution) impacts. While the addition of hard structure may have positive impacts to structure-seeking species, potential negative impacts may also occur to species that prefer soft sediments. A particular concern that is not addressed in the COP or the DEIS is the potential for black sea bass to spend more time offshore in the WDA, which would affect the nearshore population. We recommend that the FEIS identify species that could be vulnerable to this change and pre- and post- construction monitoring should be developed to measure this potential impact.	Section 3.2.2 of the FEIS has been updated to include monitoring initiatives to ensure documentation of potential effects on benthic resources. Mitigation measures that could be included as a condition of COP approval are included in Appendix D of the FEIS. Note that additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision. Section 3.3.2 of the FEIS has been updated to include additional information on assessing the effect of changes in species distributions, (e.g., black sea bass and other species that might be affected by the WDA) and refers to Vineyard Wind’s plans for fisheries monitoring.
0092-034	To address potential impacts of WTGs a study by Chen (2016) is cited “WTGs in the region would not have a significant influence on southward larval transport, although foundation placement could cause relatively large cross-shelf larval dispersion during storm events.” This issue requires further analysis as any impacts to transport of zooplankton or larvae could have wide scale impacts on a broad array of marine species including marine mammals (alteration of foraging habitat) as well as shellfish, crustaceans, and finfish with planktonic larvae. We recommend potential impacts be assessed across different WTG array alternatives, different foundation types, and different levels of buildout.	The results of the Chen et al. study with respect to larval transport are clarified in Section 3.3.2 of the FEIS. The development of the EIS has been based on Vineyard Wind’s utilization of the PDE, which included a range of 8-10 MW WTGs as assessed in the DEIS and was updated to allow for up to 14 MW WTGs. Therefore, the EIS includes an assessment based on the maximum-case scenario, as identified in Appendix G. Vineyard Wind may elect to pursue a course of action within the PDE that would cause less impact than the maximum-case scenario evaluated in the EIS.
0092-035	We recommend providing further details in the FEIS concerning potential electromagnetic field (EMF) impacts on marine fauna, particularly regarding demersal species. Cable shielding and burial are the primary means of minimizing such impacts (COP Vol 3 Ch. 6). Therefore, an explanation of how the proposed burial depth adequately minimizes risk to EMF-sensitive species is	The Scott et al. (2018) study has been added and cited and compared to the proposed Project in Section 3.3.2 of the FEIS. Note that effects were seen only at field strengths greater than 150 times the field strength expected directly over Vineyard Wind’s proposed cables (Epsilon 2018c). BOEM’s risk assessment is not based on burial depth alone. The shielding material around the conductors is

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	needed...The DEIS includes new information from a recent review of EMF impacts (Taormina et al. 2018), but this review notes the shortage of information on impacts to many marine species...There is additional information in the literature and in the response to MA DMF comments for the Massachusetts FEIR that supports the statements in the DEIS. We recommend a more cohesive assessment of the effectiveness of EMF shielding via burial, the potential impacts on benthic species, and a commitment to highly resolved burial monitoring for the FEIS.	sufficient to drastically reduce the electric field (Epsilon 2018a), while Epsilon (2018c) indicates that the depth of cable burial is a key factor for reducing the magnetic field. As described in Normandeau et al. (2011), cable burial and shielding should be effective in minimizing EMF.
0092-036	The COP states that Cable Inspection/Repair is planned for eight surveys over the Project's lifespan (Years 1,2,3,6,9,12,15, and 20) (COP Vol 1, page 4-47). We recommend including in the cable conduits continuous monitoring mechanisms that can verify cable burial (such as temperature monitoring). If continuous monitoring cannot be done, then geophysical surveys should occur more frequently and always after major storm events such as hurricanes and nor'easters.	As described in both the DEIS and FEIS, the Project would require monitoring after major storms and nor'easters; therefore, additional cable monitoring would be a proposed monitoring recommendation, as shown in Appendix D of the FEIS, and could be a condition of COP approval.
0092-037	Furthermore, a study to confirm assumptions made in the FEIS EMF impact assessment is recommended as part of the pre- and post- fisheries resource monitoring plan that Vineyard Wind has committed to.	Section 2.2.1, Section 3.3.6.3, and Appendix D of the DEIS included a discussion of monitoring and mitigation proposed for the Project. Section 3.3.2 of the FEIS has provided additional language for monitoring. Additional monitoring requirements and mitigation measures, if any, will be developed in coordination with the NMFS and included in the Record of Decision. FEIS Section 3.2.2 has been updated to include monitoring initiatives to ensure documentation of potential effects on benthic resources. Mitigation measures that could be included as a condition of COP approval are included in Appendix D of the FEIS. Note that additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0092-038	The FEIS should address potential impacts of light on finfish, invertebrates (especially squid), and EFH as recommended in MA DMF's previous comment letter on the scoping of the EIS.	FEIS Section 3.3 of the FEIS has been updated to examine the effect of light on finfish, invertebrates, and EFH.
0092-039	Benthic Habitat Monitoring Plan (COP Vol 3 App 3)...The benthic monitoring plan needs additional detail with respect to how change will actually be measured and may need additional sampling stations for a quantitative assessment. The plan should state the hypotheses being tested. The plan identifies reports as the primary product; we recommend all data be made available in regional database management systems.	Section 3.2.2 of the FEIS has been updated to include monitoring initiatives to ensure documentation of potential effects on benthic resources. Mitigation measures that could be included as a condition of COP approval are included in Appendix D of the FEIS. Note that additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0092-040	Environmental Management System – this is referred to in the COP (Vol 1, page 4-1) but the EMS is not provided. We request clarity on whether or not it will be used. Our primary concern is that contractors do not damage vulnerable seafloor areas that are being avoided by cable routing...We also want to ensure that the	As a condition of the construction operation plan approval and pursuant to 30 CFR 585.627(c) and (d), BOEM will require Vineyard Wind to submit a fully functional Environmental Management System, Oil Spill Response Plan and a description of the Safety Management System for their renewable energy facility. BOEM will work with the Bureau of Safety and Environmental Enforcement

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	maximum efforts are taken to reduce the risk of at sea disposal of contaminants including grouts, HDD fluids, plastics, and oils.	<p>(BSEE) to review the plans' content and provide recommendations as to their sufficiency and whether or not to revise, approve or approve with modifications. BOEM and BSEE will require the fully functional OSRP to be in place 30 days before the installation process begins for Vineyard Wind's facility and to maintain its operational capacity once the wind energy facility is generating electricity. The SMS describes safety, monitoring, emergency response, fire suppression, management system testing, and personnel training. It should also incorporate both safety and environmental management systems. The SMS must be fully functional before installations commence.</p> <p>BOEM and the BSEE will require Vineyard Wind to submit a fully functional Environmental Management System, including environmental management system, before installations commence.</p> <p>The definition of oil for OSRP submittal means petroleum and non-petroleum based oils of any kind or in any form, including but not limited to petroleum, fuel oil, sludge, oil refuse, and oil mixed with wastes other than dredged spoil.</p>
0092-041	We recommend that sea monitoring include ongoing monitoring of the soundscape by placing hydrophones on multiple WTGs to enable the identification of marine mammal activities to reduce risk of vessel strike. Appendix D identifies that passive acoustic monitoring will be used; we recommend integrating this into the Monitoring and Control section of the COP.	Sections 2.2.1, 3.4.2, and Appendix D of the FEIS have been revised for a discussion of monitoring and mitigation that has been proposed for the agency-preferred alternative. Pre- and post-construction monitoring plans, if required, will be developed in coordination with the NMFS as part of the ESA Section 7 consultation. The suggestion to perform ongoing monitoring of the soundscape by placing hydrophones on multiple WTGs is not a proposed mitigation measure. All post-construction monitoring, if required, is being developed in coordination with the NMFS as part of the ESA Section 7 consultation.
0092-042	The COP states that "Seabed preparation may be required prior to foundation installation. This could include the removal of large obstructions at the seabed, or to avoid excessive seabed gradients." (Vol 1, page 4-17) It is our understanding that the WTGs will be located to avoid large obstructions and avoid excessive gradients. If "seabed preparation" due to unforeseen conditions is needed, BOEM should be notified prior to that work.	As explained in Appendix G of the DEIS, the PDE, no drilling is anticipated for foundation installation; however, it may be required if a large boulder or refusal is met. If drilling is required, a rotary drilling unit would be mobilized. Similarly, vibratory hammering could be used if deemed appropriate by the installation contractor. The estimated 10 percent is not associated with drilling of the foundations.
0092-043	In cases where monopile drilling is needed, "The interior sediment will then be drilled out and deposited on the seabed adjacent to the scour protection material until the monopile is no longer obstructed." (COP Vol 1, p 4-18). Does this material get left on the seafloor? Is that area included in the 10% estimate for scour protection?	As explained in Appendix G of the DEIS, the PDE, no drilling is anticipated for foundation installation; however, it may be required if a large boulder or refusal is met. If drilling is required, a rotary drilling unit would be mobilized. Similarly, vibratory hammering could be used if deemed appropriate by the installation contractor. The interior sediment would be drilled out and deposited on the seabed adjacent to the scour protection material until the monopile is no longer obstructed (COP Volume I, Section 4.2.3.4; Epsilon 2020b). The material would be left on the seabed next to the obstructed structure. The estimated 10 percent is not associated with drilling of the foundations.

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0092-044	We recommend that the scour protection be sloped to its outer edge so there is no edge with the surrounding seafloor. Stone with a variety of sizes between the stated sizes are recommended. Additional variety in grain size and porosity is beneficial for marine organisms. The method for placing scour protection has not been identified. The method should be accurate in its placement of material to minimize the extent to which the seafloor disturbed.	Section 2.1.1.1 of the FEIS has been updated to indicate how scour would be placed, and to state that the fall pipe method would be used to install scour protection more precisely.
0092-045	Table 5-1. Required permits. Needs to include MA DMF Letter of Authorization (LOA) for the pre-lay grapnel run. (COP Vol page 5-2)	Please see Table 3.2-1 in Appendix B of the FEIS.
0092-046	The MassDEP 401 (Water Quality Certification) (WQC) Program supports the proposal of Vineyard Wind LLC to use proven installation techniques to deepen the export cable and avoid hard and complex seafloor to the maximum extent possible in order to avoid or minimize impacts to natural resources and marine habitats. MassDEP discourages cable protection using rock placement, concrete mattresses, or other protective methods due to their detrimental impacts to biological resources and marine habitat.	As described in Appendix D of the FEIS, all dredging and cable installation activities use the least environmentally harmful method that would be effective in each area. Additionally, the timing and method of transmission cable installation will be coordinated to not interfere with the conch spawning or any other species. Further, as described in Section 2.1.1.1 of the FEIS, tools planned for use during cable installation are expected to minimize or eliminate the need for cable protection along the OECC. As discussed in the revised FEIS, Vineyard Wind considers cable burial a priority, and would use iterative analyses of survey data, advanced burial techniques, and micro-routing to maximize burial and minimize the need for cable protection (Epsilon 2018a). Based on survey data, Vineyard Wind expects that burial of the inter-array cables would be successful without requiring cable protection; however, Vineyard Wind has conservatively estimated that 10 percent of the OECC would require protection, which equates to approximately 27.5 miles (44.2 kilometers). Vineyard Wind would survey the cable burial depth after construction and would monitor the depth periodically. The DEIS already considered a potential mitigation measure of requiring a minimum cable burial depth.
0092-047	Pursuant to 314 CMR 9.07(2)(b)(5), for projects displacing over 10,000 cubic yards of dredged material, the Proponent shall develop a project-specific sampling and analysis plan and this plan shall be submitted in draft form to MassDEP for review and comment as part of the pre-application process..The final proposed dredging method and total dredge volume should be provided as part of the MassDEP 401 WQC/Chapter 91 Dredging Permit applications.	Thank you for your comment.
0092-048	It is essential that the Proponent monitor the turbidity (and total suspended solids, if appropriate) within both the construction/dredging corridor and the immediate area beyond the work corridor...Although sediment dispersion and turbidity impacts to water quality during installation and cable-laying may be minor due to limited duration and small work area, it is recommended that the Proponent adopt Best Practice Management to reduce turbidity as much as possible during construction. After the final installation route is identified, the following actions should be taken by the Proponent: collection of pre-installation data such as grain	The requested monitoring actions are already part of the Proponent's plan.

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	size composition, substrate type, and bathymetric map along the installation route; monitoring of the sediment plume and water turbidity during cable installation; and documentation of changes in sediment composition and bathymetry mapping. Long-term monitoring will be required to document any changes to the sediment profile in order to assess habitat recovery.	
0092-049	Dredging of the top portion of sand waves may be necessary to allow the cable installation tool to reach the stable sediment layer under the base of the mobile sand unit/habitat. Any associated impact to the habitat is assumed to be minimal and short in duration...The Proponent should provide an estimated time period expected for the natural restoration of the ocean bottom morphology based on the best available information or experience.	Section 2.1.1.1 of the FEIS has been updated to include additional information on cable burial risk and Sections 3.1 and 3.2 of the FEIS for a discussion of potential effects from cable installation.
0092-050	The preferred transition site from offshore to onshore is the paved parking lot at Covell's Beach. The use of HDD to transition the submarine cables from offshore to onshore can minimize impacts to marine habitats and natural resources within intertidal areas.	Thank you for your comment.
0092-051	The offshore cables will be buried using a jet plow, mechanical plow, and/or mechanical trenching, as suited for the bottom type in the immediate area. Dredging may be necessary in some areas, especially where large sand waves occur. The 401 WQC/Chapter 91 permit application should provide more detailed information on why and how cable installation tools can further minimize dredging and the impact to benthic organisms.	Thank you for your comment.
0092-052	Vineyard Wind LLC has committed to performing post-construction monitoring to examine the disturbance of and recovery of coastal and benthic habitats in the Proposed Action area...more detailed information such as monitoring frequency on recolonization and succession of benthic communities among different habitats is not clearly described in the long-term monitoring plan. We recommend a more detailed sampling and analysis plan (SAP) be developed and included in the 401 WQC application. A monitoring plan should also be provided to assess the impacts following the removal or decommission of all installations.	Thank you for your comment.
0092-053	The DEIS states that the project may have possible long-term beneficial effects on biological communities. Although possible, these newly created habitats may also facilitate the establishment and spread of invasive species... In coastal New England, invasive tunicates have become an emerging issue (Colarusso 2018) 2. New artificial structures will create hard substrate for invasive species colonization with the potential for impacts to commercial and recreational fishing operations...Therefore, a systematic monitoring plan for potential marine invasive species colonization should be developed prior to commencement of the project. Corresponding appropriate management actions should also be adopted to control colonization of invasive species in these artificial habitats if necessary.	Sections 3.1.2, 3.2.2, and 3.3.2 of the FEIS have been revised to explain potential benefits and caveats of the reef effect and acknowledge the possibility of infestation by invasive species. Section 3.3.2 and Appendix D of the FEIS have been updated to include monitoring and mitigation proposed for the agency-preferred alternative.

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0092-054	Because an SAP requires approval from MassDEP per 314 CMR 9.07(2)(5), it is recommended that all pre-construction data (baseline data) be submitted, or collected as needed and submitted, to MassDEP before filing a 401 WQC application. This information is required in the 401 WQC permitting process to ensure the project meets the state water quality standards to avoid, minimize, and mitigate impacts to biological communities and their habitats. Both raw data and secondary data are welcome. These data include but are not limited to the 2018 Marine Habitat Survey, Eelgrass, Benthic Community, Fisheries. Electronic data format such as Access or Excel is preferred and will be helpful in facilitating the 401 WQC review process. We encourage the Proponent to discuss appropriate data collection and analysis methodologies with MassDEP during the development of any data collection plan.	Thank you for your comment.
0093-001	We disagree that the long-term impacts to squid will be “minor” due to operational noise. We also disagree that the short-term impacts of construction would be “minor” if conducted during the squid presence in the Vineyard Wind lease area, roughly from May through August... Relatively low levels of even short exposure to low frequency sound such as produced by offshore wind farms can induce severe acoustic trauma in cephalopods such as squid, leading to the death of the animals... The dB and Hz levels of studies demonstrating this acoustic and physiological trauma to cephalopods such as squid, combined with studies focusing on the noise levels produced by operating wind farms, show overlap...Another factor we have to consider is the tonal content of the noise emitted by turbines in operation...Due to the size of the Vineyard Wind turbines, squid stocks, and fishery, well outside the project area are likely to be negatively impacted by the project.	Section 3.4.5.1 of the DEIS acknowledged that impacts, such as noise, may cause fish and squid to move away from the source or result in the death of the fish if it is unable to move away from lethal exposure levels. Thus, if fixed-gear is set within the unmitigated 0.5-mile (0.8-kilometer) acoustic zone of injury for fish, the gilled or trapped animals may die prior to harvest. BOEM expects pelagic species to largely avoid areas of disturbance, but return shortly after such activities end. The Project will use noise reduction technologies during all pile-driving activities to achieve a required minimum attenuation (reduction) of 6 decibel (dB) re 1 micropascal (μ Pa) and will target a reduction of 12 dB. Vineyard Wind will also use fixed PAM buoys or autonomous PAM devices to continuously record ambient noise in the lease area (before, during, and immediately after construction), record marine mammal vocalizations, and monitor Project noise including vessel noise, pile driving, and WTG operation. Data collection, archival, analysis, and reporting of the results would be conducted by third parties following established guidelines specified by BOEM. WTG operational noise intensity, as discussed in Section 3.3.2 of the FEIS, is expected to be below the only measured threshold for injury to cephalopods. Therefore, we do not think noise produced from operating turbines would have impacts on squid populations.
0093-002	National Marine Fisheries Service, in response to the Vineyard Wind project, has also noted that: “These short-lived semelparous species have distinct spawning behavior that may be disrupted due to construction activities and turbine operations. Should disruption of spawning behavior occur over a prolonged period, reproductive and subsequent recruitment success may be compromised over the short- or long-term” and the early life stages of squid are a noted “Species of Concern”.	Section 3.3.2 of the FEIS states that cable laying would be avoided in springtime within Nantucket Sound, a major squid spawning area. Cable laying in Nantucket Sound would occur during September and October only. Potential impacts of pile driving in the WDA are discussed in Section 3.3.2 of the FEIS.
0093-003	As other leases, including the NY WEA, are sited on squid grounds as well, the cumulative impacts will not be “minor”. BOEM’s analysis assumption on page	As stated in the DEIS Section 3.3.6.10, the analysis area for fish, invertebrates, and EFH includes the entire Northeast Shelf Large Marine Ecosystem (LME) to

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	3-193 of the DEIS that “based on proximity to the WDA...the BSW and Revolution projects would likely have the greatest contribution to cumulative effects” is flawed. While cumulative local effects, on specific fishing grounds encompassed by multiple projects or on navigation to and from certain ports, may be assessed in this way, entire fisheries such as the squid fishery- which occur in time and space in specific areas- cannot be assessed by pure “proximity” of projects.	account for the range of movement of potentially impacted species. Revisions to this section describe the potential impacts of multiple projects on finfish, invertebrates, and EFH. Proximity to the WDA is more important for fisheries economics than for fish populations, and is discussed in Section 3.10 of the FEIS. Section 3.10 of the FEIS has been updated to include an assessment of commercial fisheries’ revenue exposure, per the edited list of reasonably foreseeable future offshore wind projects as described in Appendix A. The individual resource sections have been edited to account for the new list of reasonably foreseeable future offshore wind projects.
0093-004	Additionally, there are no “beneficial” impacts to the squid stock from reef/scour protection construction; the impacts to primary squid habitat, which is comprised of softer bottom, will be negative.	Section 3.3 of the FEIS clarifies that potential beneficial impacts on finfish, invertebrates, and EFH would only benefit hard-bottom and structure-oriented species; impacts on soft-bottom species are described as adverse.
0093-005	Overall, a permanent habitat conversion from softer to harder bottom is negative, as softer bottom habitat is the most ecologically productive bottom type in the North and Mid Atlantic. This has the potential to negatively impact all fisheries, particularly squid, coastal industries that rely on fisheries and the entire Atlantic ecosystem, due to the cumulative impacts of all BOEM leases including the Vineyard Wind lease.	Sections 3.1.2 and 3.2.2 of the FEIS has clarified that habitat conversion would cause a substantial increase in rare hard habitat and an insignificant decrease in common soft habitat.
0093-006	...the impacts to squid will be major. Therefore, impacts to the squid fishery will also be major. Both from impacts to the stock itself, as well as from the lack of access- not restricted access- that will result to the fishery from the project. At numerous times, we have emphasized that our vessels, and our customers vessels, will be unable to operate within the Vineyard Wind project, which BOEM acknowledges in the DEIS. However, BOEM expects that this restriction or lack of access will apply only to pelagic fisheries and HMS; this is incorrect, as it will apply to bottom trawl fisheries as well. Bottom trawl fisheries will be those most impacted, as cable and scour protections can cause the most damage on this gear type.	Sections 3.10.1 and 3.10.2 of the FEIS have been revised to provide addition information on squid resources in the WDA, as well as impacts for that resource.
0093-007	It is imperative that BOEM conduct the correct analysis on the squid fishery at this stage and ensure the corresponding mitigation/compensation to the fishery and associated infrastructure.	Section 3.10.1 of the FEIS has been revised with additional information on squid and Section 3.10.2 of the FEIS on squid related assessment.
0093-008	BOEM’s original Environmental Assessment on “Commercial Wind Lease Issuance and Site Assessment Activities on the Atlantic Outer Continental Shelf Offshore Massachusetts” analyzed that the most important species by dollar value present in and around the “Massachusetts WEA”, as it was termed at that time, was the sea scallop. This is not the case in the Vineyard Wind area, as the squid fishery is the most lucrative fishery in the Vineyard Wind lease area..the original BOEM EA analysis solely focused on “Commercial Landings by Weight and Value for All Species Contributing over \$1 million in Massachusetts in 2010”,	Updated fishing revenue data are included in Section 3.10 of the FEIS, and these data show the importance of both Point Judith and New Bedford. The discussion on the importance of squid fishery in the WDA in Section 3.10.1 of the FEIS has been revised.

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	with only a cursory glance at the overall dollar value of commercial ports in other New England states. To start, to consider the value of commercial landings by weight and value for species landed only in the state of Massachusetts - for a lease area in federal waters which is utilized by many vessels from many states- is egregious and negligent. This would explain why the squid fishery was essentially eliminated from the discussion at the outset of the Vineyard Wind lease process. The majority of East Coast squid is landed not in Massachusetts but in Rhode Island. In fact, Rhode Island lands more squid than all other East Coast states combined, and has consistently for years. By focusing solely on the species landed in Massachusetts during the initial lease process, BOEM did not do its due diligence in analyzing impacts to commercial fisheries of other states, which may have in fact eliminated, at minimum, portions of the lease area prior to leasing...	
0093-009	New analysis by RI DEM values the Vineyard Wind lease area at greater value to the state of Rhode Island than the state of Massachusetts, a fact which is directly correlated to the RI squid fishery. However, RI DEM has also made it clear that its data as it currently stands does not give a complete assessment of the value of fisheries in the Vineyard Wind project area, and that the limited data available in regards to species, timeframes, ecosystem impacts, and local economic impacts make it insufficient for compensation purposes.	NOAA provided specific fishing revenue and landed pounds by species, port, gear type, and state for the WDA and these data have been incorporated into Section 3.10 of the FEIS.
0093-010	As most of the shoreside processing for squid also is based in Rhode Island, the economic multiplier effects to purely ex-vessel value analysis must also be accounted for. Due to the fact that squid are not cleaned at sea, unlike sea scallops which arrive in port already removed from their shell and in edible form, the land-based economic multiplier is likely higher for squid than for scallops. However, in a fisheries mitigation proposal that Vineyard Wind did not wish to make public at the January 14, 2019 Rhode Island Fisheries Advisory Board meeting, Vineyard Wind “disagrees” with the RI DEM analysis, proposes to offer the fishing industry a compensation that is 83% lower than the incomplete RI DEM analysis, and denies shoreside multiplier economic impacts, which are in fact a routine part of fisheries economic analysis. For example, one study estimated the total economic value of the commercial fishing industry in the State of Rhode Island in 2010 alone to be over \$1 billion. Another fisheries study estimated the economic activity generated by \$81 million of ex-vessel value of surfclams to be \$626 million of total economic activity.	Economic multipliers were not estimated for the WDA; however, a study conducted by the University of Rhode Island on the Economic Impacts of the Rhode Island’s Fisheries and Seafood Sector investigated the contributions of commercial fishing and shellfish, fishing, charters, processing, professional service firms, retail and wholesale seafood dealers, service and supply firms, and tackle shops to assess their contributions to the state and national economy. The study concluded that the seafood industry generated 3,147 jobs and \$538.3 million in gross sales with the total spillover effect to other industries of 4,381 jobs and output of \$419.8 million. The vessel landings job multiplier was estimated at 32.43 jobs per one million dollars while the vessels landings economic impact multiplier was estimated at 3.06. Further, the total fishing revenue from Rhode Island is much higher compared to the revenue from the WDA landed on Rhode Island ports. Section 3.10 of the FEIS has been revised to address this topic.
0093-011	BOEM acknowledges that, if unmitigated, operational impacts and impacts to fishery resources would be “moderate to major”, but reduces this estimate to “minor to moderate” due to compensation/mitigation measures identified in Volume III of the Vineyard Wind COP. In fact, BOEM acknowledges that in some situations, a large portion of fishing vessels’ annual income may be	Section 3.10.2 of the FEIS has been revised to include a discussion of displacement and potential conflict over fishing grounds and voluntary compensation. Section 3.10 of the FEIS has been updated to include details of mitigation and monitoring measures relative to commercial fisheries, including voluntary financial compensation. Appendix D of the FEIS has also been updated

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	<p>inaccessible during operations, resulting in major impacts on individual vessel owners, but because “BOEM anticipates that the use of compensation payments to affected fishermen would reduce impacts to minor to moderate” does not further address the issue. However based on Vineyard Wind’s incomplete mitigation proposal, which undervalues direct fisheries impacts and does not include impacts to shoreside infrastructure that also rely on the same resources to survive, the negative impacts to the commercial fishing industry, particularly the squid fishery, remain “major”. Throughout the offshore wind process, BOEM has repeatedly assured the commercial fishing industry that our concerns would be fully addressed in the DEIS process, which is now for the Vineyard Wind project. We encourage BOEM to require the necessary analysis to be conducted and delay any approval of the project in order to complete due diligence.</p>	<p>to include modifications and/or additional mitigation and monitoring measures. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.</p>
0093-012	<p>We have commented to BOEM many times on. The need to avoid pre-existing hangs and other obstructions, which will become impossible once turbines and other infrastructure are in place. This will have major implications for the squid fishery, as even data collected by Vineyard Wind itself demonstrates “very high” activity within the WDA. Impacts to the fishery due to loss of fishable/maneuverable area will be “major”.</p>	<p>Section 3.10 of the FEIS has been revised to provide updated information on the assessment of impacts on fisheries and fishing locations. Section 3.10.1, Figure 3.10.-2 of the FEIS acknowledges that squid is an important fishery in the WDA, with squid fishing vessel density in the WDA characterized as medium high to high. However, less than 2 percent of the total coast-wide value for Mackerel, Squid, and Butterfish FMP is from the WDA. In addition, Section 3.10.2 of the FEIS states that “In a given year, it is possible that the center of the resource’s exploitable biomass would be found within the WDA during operations and maintenance. If that were to occur, some fisheries—like the squid trawl fishery—may not be able to safely operate and harvest the resource in the WDA using status-quo fishing techniques. In this situation, a large portion of annual income for vessels may be inaccessible during operations, resulting in major impacts on individual vessel owners for a given year that could have longer-term impacts due to low operating capital.” However, mitigation measures identified in Appendix D and the use of compensation payments to affected fishermen would reduce impacts, if consummated. Vineyard Wind has also prepared a cable burial risk assessment and may engage with the fishing industry to determine what form of placements would be the least likely to create new hangs for mobile gear. Although it is expected that initially it would be more challenging for squid fisheries to operate in the WDA, with time, most fishermen would adapt to WTGs spacing and would be able to fish successfully in the WDA.</p>
0093-013	<p>We also disagree that “Displacement of fishing vessels, leading to increased conflict over other fishing grounds” will also be “minor to moderate”...A full study on this issue should be completed for this project prior to any BOEM approval of any COP. Conflict due to displacement of fishing vessels resulting from loss of fishable area is one aspect of this issue; another is displacement of vessels resulting from loss of transitible area. It is reasonable to see that vessel transit traffic will now be concentrated in areas of the squid fishery outside the</p>	<p>Section 3.10.2 of the FEIS has been revised to discuss displaced vessels. Fishing in the WDA will continue and not all vessels will be displaced. For the displaced vessels, it is impossible to determine the alternative fishing locations as that will depend on individual choices.</p>

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	project area, which will increase conflict there as well. See, for example, vessel traffic routes through the WDA that will need to be rerouted closer to land on page 3-202.	
0093-014	<p>We additionally disagree with BOEM that “Damage or loss of deployed gear due to mobile gear striking or hooking on proposed Project infrastructure (e.g., unburied or insufficiently buried cables)” is “minor to moderate”. Rhode Island fishing vessels have already experienced this difficulty with the cables related to the Block Island Wind project, and some have already received compensation for such. However, looking at the heavy squid fishing activity that occurs over the proposed cable route, the interactions will be orders of magnitude higher with the Vineyard Wind project. We... requested an alternative cable route that did not cut through the heart of the squid fishing activity adjacent to the site, but were not accommodated. Should cable matting or insufficiently buried cables be laid in the middle of a squid tow, the entire tow may be made unworkable. As Vineyard Wind has not submitted exact cable matting/rock or other cable protection locations as part of its COP, this impact is not fully assessable, and we would encourage BOEM to require locations in the final EIS for this express purpose... We agree that BOEM should require a minimum cable burial depth between the WDA and Muskeget Channel to avoid trawl hangs; however, we believe it should be deeper than 6.5 feet to account for natural sand dynamics which could uncover the cable over time..and also stipulate a requirement that no cable mattresses/scour protection that could damage trawl fishing gear be allowed to be used in that area.</p>	<p>Mitigation measures, if consummated, provide compensation for damage or loss of deployed gear as well as compensation for the loss of fishing revenue. Additional compensation programs are outlined in the updated Appendix D and the revised Section 3.10.2 of the FEIS. In terms of economic impacts, mitigation measures that provide compensation for economic loss are appropriate to reduce the magnitude of impacts on commercial fisheries.</p> <p>Additionally, Section 2.1.1 of the FEIS has been updated to address cable burial risk for the proposed Project. The OECC would have a target burial depth of up to 5-8 feet (1.5-2.5 meters). Potential interactions with fishing gear are discussed in the revised Section 3.10.2. Daily communication plans between squid fishery representative and cable-laying vessel operator will be required to mitigate the potential for reduced access to squid resources by the commercial fishery in the spring and summer.</p> <p>Last, Section 2.1.7 of the DEIS and Section C.5 in FEIS Appendix C included information related to the following alternatives that were considered but not carried forward for analysis: alternative landfall locations, an offshore regional transmission network, a shared cable corridor. Alternate cable routes would likely be longer in length, which could contribute to other increased impacts on environmental, social, cultural, and historic resources.</p>
0093-015	<p>Communication and radar signals are of utmost importance to mariners, particularly in inclement weather, at night, in the fog, etc... BOEM should require updated analysis on the extent and scope of interference with marine radar and communication signals from 9.5 MW turbines prior to any approval or construction of the Vineyard Wind project. The only definitive document available to date analyzing the linear extent of radar interference, to our knowledge, is the UK Maritime and Coast Guard Agency’s MGN 372 (M+F) study, published in 2008 which cites a 2004 trial at a wind farm comprised of 2MW turbines, in which interference extended 1.5 nautical miles from the turbines. However, larger turbines will likely exhibit a larger interference footprint...it is a maritime safety issue of utmost importance that must be analyzed and addressed prior to project approval, particularly, as BOEM has noted, since search and rescue will also be inhibited by the project. ..Therefore, accurate, up to date analysis of radar and marine communication interference is necessary at this time...that the extent of this interference will also impact some of BOEM’s other analysis, such as vessel traffic routes.</p>	<p>The DEIS discussed how radar would be impacted during operations in maintenance in Section 3.4.7.3. The grid-array of regularly spaced WTGs could produce false and multiple radar echoes for vessels in or approaching the WDA (COP Appendix III-I, Section 7.2.2.1; Epsilon 2020b; MMS 2009; de la Vega et al. 2013; Ling et al. 2013). Pursuant to draft USCG conditions for authorizing the Project (submitted in April 2019), Vineyard Wind will conduct a project-specific study of impacts on marine communication, navigation, and radar.</p>

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0093-016	... Vineyard Wind and BOEM continue to rely on AIS data from 2016-2017 for commercial fishing vessels to determine navigational impacts within the WDA...This is therefore creating a “lowball” estimate of total vessel traffic, as AIS is only required on commercial fishing vessels of 65 feet and greater registered length, and only within 12 nautical miles of land. Recreational vessels are not required to have AIS, so recreational traffic is also undoubtedly higher... we have repeatedly requested that BOEM utilize commercial fishing VMS traffic for all analysis purposes.	VMS data have been considered by reviewing aggregated VMS data presented in Vineyard Wind’s Supplemental Navigation Risk Assessment as well as information provided by NMFS. The FEIS has been updated to include the new, best available information for assessment purposes.
0093-017	If adverse impacts to harvesting activities...during the life of the project are considered unavoidable even with mitigation, then we would also assert that impacts to commercial fisheries be considered “major” and not “minor to moderate”	Compensation programs proposed to be put in place by Vineyard Wind subject to adoption in the ROD are outlined in Appendix D and the revised Section 3.10.2 of the FEIS. In terms of economic impacts, mitigation measures that provide compensation for economic loss are appropriate to reduce the magnitude of impacts on commercial fisheries.
0094-001	As an initial matter, given the current lapse in funding for the Department of Interior and other federal agencies, I request that you extend the public comment period for the DEIS until after the shutdown ends and the previously scheduled public meetings can be held.	The public comment period for the DEIS for the Vineyard Wind Project was extended until February 22, 2019 due to the government shutdown. Furthermore, BOEM rescheduled the five public meetings and they were held on February 11, 12, 13, 14 and 15, 2019. Appendix C (formerly Chapter 4) of the FEIS was updated with this information as well as information regarding the virtual public meetings held during the SEIS comment period.
0094-002	I further note that, according to the Vineyard Wind Permitting Timeline, BOEM expects to send its preferred alternative to the agencies for review the day after the comment period closes, on January 23, 2019. If correct, this indicates that BOEM has already chosen its preferred alternative and failed to identify it in the DEIS, as required by 40 C.F.R. §1502.14. Further, this timeframe strongly suggests that BOEM has made (or will make) its decision without due consideration of the public’s comments.	The permitting timeline has been updated since publication of the DEIS. Section 2.5 of the FEIS has been included to identify the agency-preferred alternative. FEIS Identification of the preferred alternative for this project was made in accordance with the One Federal Decision process, and was finalized with the benefit of having comments from the public, resource agencies, and other stakeholders. Notwithstanding the foregoing, it is worth noting that nothing under NEPA regulations prohibits a Federal Agency from identifying its preferred alternative prior to receiving public comments, since the regulations contemplate that a Federal Agency can identify its preferred alternative at the DEIS stage.
0094-003	...as it fails to adequately analyze the significant impact of the Project on Rhode Island’s commercial fishing industry and on the State’s valuable marine resources.	The FEIS discusses the potential impact on Rhode Island fishing industry in the revised Section 3.10. Specifically, Vineyard Wind has agreed to fund a Rhode Island Fishermen’s Future Viability Trust, as described in the updated 3.10.2 of the FEIS. BOEM does not expect the proposed Project would have a significant impact on living marine resources of Rhode Island.
0094-004	Fails to recognize long term impacts to commercial fisheries — Rhode Island provides 60% of East Coast squid catch;	The revised Section 3.10.1 of the FEIS shows that the total revenue from squid. Section 3.10.2 discusses the impact of construction activities (increased vessel traffic, noise, etc.) to seasonal commercial fishing activities.
0094-005	Fails to recognize the serious and avoidable safety and navigational impacts to the commercial fishing industry from the layout of the project in a predominately	Section 3.11.2 of the FEIS has been clarified to address this comment.

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	northeast/southwest pattern, distance between each turbine (1 nm), and width of travel corridors through the project (2 nm)	
0094-006	Fails to adequately address the serious and avoidable environmental impact of the extremely tight construction schedule, including but not limited to increased vessel traffic, continuous seismic activity, interference with seasonal commercial fishing activity, etc.;	Sections 2.1.1.1, 3.3.2, and 3.10.2 of the FEIS have been updated to provide additional discussions of the cable-laying schedule, which has been updated to accommodate seasonal fishing and spawning activities in Nantucket Sound. Section 2.1.7 of the DEIS considered the possibility of phased development (similar to extending the Project schedule) and explains that this would effectively be the same as selecting Alternative F (No Action).
0094-007	Fails to sufficiently consider avoidable seismic and other impacts to North Atlantic right whales and other endangered species, marine mammals, and other aquatic animals. For example, multiple studies have found permanent damage to squid populations, one of Rhode Island’s main fisheries, from simple seismic testing, which has a significantly less severe acoustic impact than the proposed pile driving activity; ²	Section 3.3.2 of the FEIS has been updated with additional discussion of acoustic impact on finfish and invertebrate species. Section 3.4.2 of the FEIS has been refined in coordination with NOAA and includes additional information regarding acoustic impacts on marine mammals resulting from pile driving. Section 3.5.2 of the FEIS has been updated with further discussion of acoustic impacts on sea turtles resulting from pile driving activities. The updated Appendix D of the FEIS includes monitoring and mitigation relative to North Atlantic right whale that has been proposed for the agency-preferred alternative. Many of the proposed monitoring and mitigation measures will provide benefits to finfish and sea turtles. The commenter’s assertion regarding damage to squid populations is not supported by science. Reports by Solé et al. have showed that cephalopod hearing organs can be injured by loud noise, but it has not been demonstrated that this could cause any effect to populations. In addition, the lowest measured threshold for sound intensity that could cause damage to cephalopods is louder than the loudest sounds predicted to come from the proposed Project.
0094-008	BOEM concludes limited impacts to commercial and for-hire recreational fishermen but uses data that is out-of-date, non-peer-reviewed, and nonpublic	NOAA provided data on fishing revenue and landed pounds by species, gear type, port and state for the WDA that is now included in Section 3.10.1 of the FEIS. The analysis in Section 3.10.2 of the FEIS has been adjusted accordingly.
0094-009	First, coordination with Rhode Island stakeholders did not occur until many years into research and development, despite its significant effect on Rhode Island fisheries. This delay has unnecessarily put Rhode Island in the unfortunate position of having to choose between wind energy development and the sustainability of its fisheries and ocean resources. Clearly, Vineyard Wind has prioritized meeting the deadline of expiring tax incentives over the need to engage stakeholders in arriving at a project that addresses the concerns of local fisheries and the habitat of many essential and/or endangered species.	This comment is not relevant to the analysis in the DEIS or that to be performed for the FEIS.
0094-010	Currently, the world’s largest offshore wind farm, the Walney Extension Offshore Wind Farm in the Irish Sea, has a total output capacity of 659 megawatts and took over five years to plan and initiate construction. ³ Importantly, the Project size of 800 megawatts is 21.3% larger than Walney and	The FEIS has been written with the cooperation of multiple federal agencies and has incorporated analyses and agreements made for and between state agencies and the proponent.

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	2,566.7% larger than Block Island —further proving the need for a more deliberate approach to planning and implementation.	
0094-011	Ocean SAMP § 1160.1.3 states that “where the CRMC (note: Rhode Island Coastal Resources Management Council) determines that there are significant adverse effects on Rhode Island coastal resources or uses, it can require that the applicant modify the proposal to avoid and/or mitigate the impacts or the CRMC shall deny the proposal.” CRMC has indicated to Vineyard Wind that the currently proposed Construction and Operations Plan (the subject of BOEM’s DEIS) “will have an adverse impact on coastal uses, specifically, RI-based commercial fishing interests.” (CRMC letter to Vineyard Wind, LLC, dated July 2, 2018.)	Section 3.10.2 of the FEIS has been revised to include a discussion of displacement and potential conflict over fishing grounds and voluntary compensation. Section 3.10 of the FEIS has been updated to include details of mitigation and monitoring measures relative to commercial fisheries, including voluntary financial compensation. Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0095-001	We are in dire need for getting the offshore wind industry off the ground in the US to diversify our energy portfolio and generate emissions free electricity.	Thank you for your comment.
0095-002	We need wind-related jobs throughout the industry to grow and thrive. We need the Vineyard Wind project to be permitted now so we may invigorate supply chain businesses and port facilities to become engaged in the offshore wind sector. Their 800 MW wind park will help us tremendously in getting offshore renewable energy moving in the US.	Thank you for your comment.
0095-003	The Vineyard Wind project has conducted an amazing amount of due diligence within the surrounding communities, addressing constituents’ concerns and building essential relationships to overcome fear of the unknown. Their community benefits agreement addresses tangible ways for some of the economic benefits of the project to remain within the local communities.	Thank you for your comment.
0096-001	DEMAND MANAGEMENT SHOULD BE PURSUED BY THE FEDERAL GOVERNMENT BEFORE BOEMRE PROMOTES SUPPLEMENTING SUPPLY. The USDOE and the refereed academic and technical literature indicate that electricity demand can be reduced by 30%. It would NOT be necessary to design/build a project of this size, if at all, if regional demand was reduced by 33%.	Managing power demand is outside of the purpose and need of this EIS. This EIS, and BOEM’s separate and later Record of Decision, must address the proposed Project, which is to build a facility within Vineyard Wind’s lease area. Further revisions to the FEIS were not warranted.
0096-002	THE OCEAN SHOULD NOT BE INDUSTRIALIZED and MUST NOT BE PRIVATIZED. a) The sea, ocean floor and shores of the sea are part of the public domain. In my view, it is ridiculous to sacrifice this ecosystem, which is often referred to as a “frontier”, to industrial-scale energy development because of terrestrial NIMBY-ism. BOEMRE and the applicant should be required to report on the cumulative supply of all existing and projected sources of energy within the affected “energy-shed”, including intermittent land-based and net-metered sources of energy BEFORE proceeding with licensing this offshore wind project.	The impacts of opening the continental shelf to wind energy development have already been assessed in BOEM’s 2007 Final Programmatic Environmental Impact Statement for Alternative Energy Development and Production and Alternate Use of Facilities on the Outer Continental Shelf. BOEM’s decision on Vineyard Wind’s COP is needed to execute its duty to approve, approve with modifications, or disapprove the proposed Project in furtherance of the United States’ policy to manage the development of OCS energy resources in an expeditious and orderly manner, subject to environmental safeguards including consideration of natural resources and existing ocean uses (43 USC § 1332(3)). Further revisions to the FEIS were not warranted.

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0096-003	The Public Trust Doctrine (PTD) protects intergenerational interests in navigational, commercial and recreational and passive access to and use of the sea, including the floor and shores of the sea. ..The PTD requires a legislative enactment by the affected STATES to authorize this project (Illinois Central RR c. ILL) within 3 nm of land because of dredging, cabling and effects on coastal submerged lands and fringing wetlands.	Section 1.3, Regulatory Framework and Table 1.3-1 in Appendix B includes BOEM’s authority and regulatory decision-making process, as well as other permits and authorizations required for the proposed Project.
0096-004	IF the project is licensed, BOEMRE should require the Applicant to post funds sufficient to cover: - an annual lease for the entire area of the seafloor that is occupied by pylons and/or interferes with protected PTD uses, including commercial and recreational fishing, and increased shipping costs related to new navigational routes etc; - all and any harm to threatened and endangered species and their critical habitats that are protected by federal and state Endangered Species Acts; - all and any harm to non-/tidal wetlands from any aspect of the project from manufacturing to transmission and decommissioning; - decommissioning and recovery of 100% of the wind platforms and associated components; - the cascading ecological and economic effects of any accidental or intentional pollution or waste disposal incident; - annual studies re. *trends* and economic indicators.	Appendix D of the FEIS has updated the comprehensive list of monitoring and mitigation, including voluntary financial compensation and annual monitoring, that has been proposed for the agency-preferred alternative. A thorough review of impacts on ESA-protected species is provided in the Biological Assessments prepared for USFWS and NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/
0096-005	offshore wind is still in early development phase in terms of understanding risks to marine life, includingincluding marine mammals, amphibians and elasmobranchs (sharks, rays) and other electro-sensitive organisms. The preferred plan acknowledges that risks exist for protected marine mammals and amphibians.	Thank you for your comment.
0096-006	I think the preferred version of this project should NOT licensed. IF it is, it should be accompanied by extensive financial and legal obligations to protect protected species and habitats and inter-generational PTD interests.	Appendix D of the FEIS has updated the comprehensive list of monitoring and mitigation relative to ESA protected species that has been proposed for the agency-preferred alternative.
0097-001	There needs to be more studies done BEFORE install of turbines. Tagged lobsters in that area moved a 90 miles in a couple months. The impact is far greater than just the lease area. Not enough is known about the effects of energy infrastructure on marine life. But on land its not good to live under high voltage wires, could it POSSIBLY be the same in water? Probably good to know before installing hundreds.	Appendix D of the FEIS has updated the comprehensive list of the monitoring and mitigation that has been considered and evaluated for the agency-preferred alternative. Pre-construction survey monitoring has been included in Appendix D of the FEIS and evaluated in the applicable resource-specific sections, particularly Section 3.3 of the FEIS, which contains an evaluation of potential effects to lobsters.
0098-001	There is no question that the project in question will not only offset a massive amount of carbon produced by generating electricity but will also transfor and invigorate our economy with new sustainable employment opportunities. Any environmental impacts, most of which are temporary, created by the project are mitigated by the clean energy produced and the sustainable future created.	Thank you for your comment.

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0099-001	This wind farm is going to hurt an already struggling fishing industry. Regulations put on industry in the last 15 years has caused great harm and the only thing saving us is squid. Placement of the wind farm is right where we fish for squid and other fish as well it will put most of the fleet out of business and all the business's that serves the industry.	Section 3.10.2 of the FEIS has been updated to include an added discussion relating the economic impacts on squid fisheries.
0099-002	If Vinyard Wind is serious about compensation its going to have to be in the 2 million per boat to start this will be the end of a life stile for most. The average age of fishermen is now over 50 years old it will be very hard for most to start new career and after all the regulations have left most will little reserves to take them to retirement.	Section 3.10.2 of the FEIS has been revised to include an added discussion relating the economic impacts on squid fisheries.
0100-001	The people of Vineyard Wind have worked diligently to provide renewable, off-shore wind energy for the Cape and Islands. They have met with many groups including fishermen, people who are worried about views and also people who are worried about the cables. They have answered all the concerns.	Thank you for your comment.
0100-002	With this project, Massachusetts will become a national leader in the off-shore wind energy field.	Thank you for your comment.
0101-001	RIDEM strongly recommends that the Bureau of Ocean Energy Management (BOEM) select a combination of Alternatives D1, D2, and E over the Proposed Action, as it will mitigate Rhode Island fisheries concerns more substantially than compensation alone. The letter [from Rhode Island Marine Fisheries Council dated October 12, 2018] states that the RIMFC members “recommend to the Director of DEM and CRMC that all wind power leases off southern New England be required to have turbines set in an east-west pattern with 1 nm of spacing to minimize the negative impacts on historical fishing activities, and further require that all structures are removed after the lease termination to restore fishing access to the entire area.”	Section 2.5 of the FEIS has been included to identify the agency-preferred alternative.
0101-002	Compensation may still be required for certain vessels or companies, but 84 turbines in an E-W, 1-nautical mile spaced grid ameliorates a variety of concerns. • Fishing access within the turbine array (reduced conflict between the fixed and mobile gear fisheries, mobile gear physically able to operate within the array, easier fishing within the array due to simpler headings to follow while actively towing gear, etc.)	Section 3.10 of the FEIS has been revised to provide additional information related to the use of the Project area by vessels and project layout. Section 2.5 of the FEIS has been included to identify the agency-preferred alternative.
0101-003	Compensation may still be required for certain vessels or companies, but 84 turbines in an E-W, 1-nautical mile spaced grid ameliorates a variety of concerns... • Easier navigational (more logical pattern for...mariners to follow, more consistent with abutting wind farms proposed around the Vineyard Wind wind development area (WDA) and with Vineyard Wind’s future development in the southern portion of the lease area)	Section 3.11.6 of the FEIS has been updated to acknowledge that Alternative E would result in fewer structures.

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0101-004	<p>• Lowered risk of allision or collision due to more logical navigational patterns</p> <p>...merging of Alternative E with the combined Alternatives D1 and D2 will help to reduce some of the challenges associated with D1 and D2 (i.e., increased acreage caused by wider-spaced layout). Alternative E would cause a reduction of 22 turbines, allowing the increased acreage in Figure 2.1.-5 to be eliminated</p>	Section 2.5 of the FEIS has been included to identify the agency-preferred alternative.
0101-005	The 1-nautical mile spacing may also serve to reduce turbine shadowing, or power loss caused by wake effects of upstream wind turbine generators (WTGs), to accommodate the larger 9.5 MW WTGs. This would require experimental verification via modeling (see Frandsen 2007).	Section 2.5 of the FEIS has been included to identify the agency-preferred alternative.
0101-006	The Department finds the Mitigation Measures for “Compensation for lost income due to offshore wind energy facility operations and maintenance” in Appendix D to be lacking. A complete mitigation package should include more than lost net revenue due to inability to access fishery resources within the WDA.	Section 3.10.2 of the FEIS has been revised to include a discussion of displacement and potential conflict over fishing grounds and voluntary compensation. Section 3.10 of the FEIS has been updated to include details of mitigation and monitoring measures relative to commercial fisheries, including voluntary financial compensation. Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0101-007	The consideration of only ex-vessel values omits the possible fishing impacts caused by potential environmental effects of construction and/or operation. These environmental effects may affect not only the areas within the WDA, but also surrounding areas. Shoreside impacts should also be taken into consideration, as ex-vessel values are not a complete reflection of the economic value of potentially lost seafood landings to the state economy. Refer to the attached January 14, 2019 RIDEM report on the economic exposure of the Vineyard Wind COP WDA which details an estimate of the ex-vessel value of the Rhode Island commercial fishing industry, along with a projection of that value over 30 years.	The study referenced in the comment has been consider in Section 3.10.1 of the FEIS, which now provides: Recent analysis prepared by the RI DEM for the WDA, using VMS and VTR data, provides an estimate of the ex-vessel value of the Rhode Island (RI) commercial fishing industry that is derived from the WDA (RI DEM 2019). The study suggests that the ex-vessel value of fishing in the area with an assumed 2 nautical mile buffer along the north and south boundaries is \$35.6 million for a 30-year period (including lease and construction time). The analysis assumed construction of the wind farm in a manner that is consistent with traditional fishing practices. The study further showed that almost \$21.0 million of the total 30-year value would be from Mackerel, Squid, Butterfish FMP; \$4.7 million form NE Small mesh Species (Hakes); \$4.6 million from Summer Flounder, Scup, Black Sea Bass FMP; \$2.2 from Groundfish, \$1.5 million American Lobster; \$1.0 million from scallops; and with the remaining form other species.
0101-008	Section 1.5.2. Page 1-6: Please define “reasonably foreseeable actions or other projects”. Only projects with power purchase agreements or state agreements in place appear to be considered in the cumulative impacts sections.	Definitions were provided in Appendix C of the DEIS; therefore, no changes were warranted.
0101-009	Section 2.1. Page 2-6: What is the area occupied by each turbine (foundation plus scour protection)?	Appendix G, Table G-1 of the DEIS and FEIS shows the maximum area and volume of scour that would be placed around each foundation.
0101-010	Section 2.1. Page 2-7: What amount of area will 10% of the inter-array and OECC (offshore export cable corridor) equate to?	Vineyard Wind has conservatively estimated that 10 percent of the OECC would require protection, which equates to approximately 27.5 miles (44.2 kilometers).

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0101-011	The RIDEM suggests avoiding the use of concrete mattresses for cable coverage, as there have been reported and unresolved conflicts with this type of coverage in Rhode Island state waters.	Section 3.10.2 of the FEIS has an added discussion of cable burial. Concrete mattresses may need to be used in proper burial depth of cable is not achieved.
0101-012	Visual monitoring by the University of Rhode Island has shown that the mattresses have not been colonized by organisms that prefer hard bottom habitat. Rock placement or other types of cable protection may be better for allowing marine life to recolonize the area post cable installation.	The FEIS has been updated to describe scour protection under Section 3.2.2, including a mention of the observation that concrete mattresses at Block Island Wind Farm were not readily colonized. The revised 3.2.2 of the FEIS also indicates that Vineyard Wind favors rock protection. The FEIS lists potential types of cable protection in Sections 3.1.2 and 3.2.2. In addition, the potential location of cable protection, including cable burial risk assessment is discussed in Sections 3.1.2 and 3.2.2 of the FEIS.
0101-013	Section 2.1.1.2. Page 2-8: The operating phase of the project is stated as 30 years in this section. Therefore, any mitigation to the fishing industry should be done on a 30-year basis.	If the COP is approved or approved with conditions, the ROD will specify the mitigation measures that BOEM and other resource agencies will require. Some of such measures that could become requirements are outlined in Appendix D of the FEIS (updated since the DEIS), although other measures not included, or additional details of those that are, could be included in the ROD.
0101-014	Section 2.1.4. Page 2-11: Will BOEM actually consider any project alternatives that will require substantial additional survey work to resolve data gaps for WTG placements and inter-array cable locations not contemplated in the Proposed Action?	The alternatives considered in the NEPA analysis are included in Chapter 2 of the FEIS. BOEM's preferred alternative is described in Section 2.5 of the FEIS.
0101-015	Section 2.1.4.1. Page 2-11: When stating that the Proposed Action will result in a minimum of 0.75 nautical mile spacing, what is this spacing measured between? Is this between the towers, the foundations, or does it also incorporate scour protection? The Rhode Island fishing industry has stated the 1-nautical mile spacing should be between the scour protection, as it will prevent mobile fishing in close proximity, which therefore reduces the navigable and fishable region between turbines.	Section 2.1.1.1 of the FEIS has been updated to indicate the Proposed Action's minimum, maximum, and average spacing between the WTGs. The Proposed Action has an average spacing between WTGs of approximately 0.86 nautical mile within the 75,614 acre (306 km ²) WDA. The minimum distance between nearest turbines is no less than 0.65 nautical miles and the maximum distance between nearest turbines is no more than 1.1 nautical miles (COP Section 3.1.1.1, Volume I; Epsilon 2020b).
0101-016	Section 2.1.4.1. and Section 2.1.4.2. Page 2-11: Here and throughout the document, Alternative D1 and D2 seem unnecessary as they do not individually meet the needs of the Rhode Island commercial fishing industry. A combined alternative D (1-nautical mile spaced turbines in an E-W layout) would meet the request and save space throughout the document.	The DEIS analyzed potential effects from two alternatives, D1, 1 nautical mile spacing between turbines, and D2, an east-west orientation with 1 nautical mile spacing between turbines. Both alternatives are related to layout and Chapter 3 and Appendix A of the EIS includes potential effects from both alternatives considered.
0101-017	Section 2.1.7. Page 2-15: BOEM asserts that a Shared Cable Corridor was not analyzed in detail because the presence of a Vineyard Wind transmission cable does not prevent other developers from laying cables in close proximity to the Vineyard Wind cable. However, this assertion ignores potential environmental benefits and fishing mitigation due to ensuring that a smaller area will be disturbed by construction and a more limited area will potentially have new hangs created within it.	As stated in Section 2.1.7 of the DEIS, shared cable corridors was an alternative considered but not analyzed in detail and explained why it was discounted further.

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0101-018	Section 2.1.7. Page 2-16: The statement that phased development and monitoring potentially reducing environmental impacts is “speculative at this time and could impact project economic feasibility” is essentially affirming that economic gain is more important than minimizing environmental effects. Using this approach, there is limited consideration for ecosystem services, existence value of affected species, etc. A phased approach would allow for incorporation of the precautionary principle into the development process, without preventing innovation. Such an approach may slow development but allow ample research to be conducted and impacts to be addressed on a smaller scale (in both space and time).	As stated in Section 2.1.7 of the DEIS, phased development and monitoring was an alternative considered but not analyzed in detail and explained why it was discounted further. While this alternative might have the eventual effect of reducing some environmental impacts, a phased approach could present permitting challenges. This alternative would also, by its nature, create permitting delays and project risk that could potentially foreclose its economic feasibility. This alternative would therefore effectively be the same as selecting Alternative G (No Action).
0101-019	Section 2.3. Page 2-18: ...The Proposed Action has spacing of 0.75 nautical miles between WTGs, which fishermen have argued is not sufficient for safe fishing and/or navigation. They have suggested 1 nautical mile at minimum.	The average separation between WTGs is 0.86 nautical miles, with a minimum separation distance of 0.65 nautical miles, and a maximum separation distance of 1.1 nautical miles for the Proposed Action. See Section 2.1.1.1 of the FEIS. Section 3.10 of the FEIS has been revised to provide additional information related to the use of the Project area by vessels and project layout. Section 2.5 of the FEIS has been included to identify the agency-preferred alternative.
0101-020	Section 2.3. Page 2-18: The statement that cable displacement or damage by fishing gear is unlikely due to cable burial or hard armoring needs elaboration. The type of hard armor is of significance, as concrete mattresses may not stay in place if caught on towed mobile gear, which would leave the cable exposed. There were unconfirmed reports of a concrete mattress being dragged by a purse seine in Rhode Island waters. While these reports were never confirmed to RIDEM by the cable owner, it may be worth considering this possibility while deciding on cable armoring strategies.	It has been acknowledged in the revised Section 3.10.2 of the FEIS that there are unconfirmed reports of a concrete mattress being dragged by a purse seine in Rhode Island waters.
0101-021	Section 2.3. Page 2-18: The WTGs will be designed to endure sustained wind speeds of up to 112 mph and gusts of 157 mph. They will also be designed for maximum wave heights greater than 60 ft. Are these planning parameters sufficient given increased storm strengths in recent years and northward shifting peak intensities (Emanuel 2017)? The Saffir-Simpson Hurricane Wind Scale indicates that a category 5 hurricane has sustained winds greater than 156 mph, while the WTGs can only handle 112 mph sustained winds (category 3 hurricane intensity). Additionally, hurricane Florence (2018 category 4 storm) had waves that exceeded 83 ft. (www.weather.gov/wrn/florence).	Section 2.3 and Appendix E (Section E.2.4) of the FEIS includes a discussion on severe weather and natural events. The design parameters for the WTGs are sufficient based upon historical data, site-specific measurements, and engineering design practices. BOEM expects that the Vineyard Wind project will be designed in accordance with the International Electrotechnical Commission (IEC) 61400-1 and 61400-3 standards. These standards require designs to withstand forces based on site-specific conditions for a 50-year return interval (2 percent chance occurrence in a single year) for the WTGs. This means that the WTGs are not designed just for average conditions, but for the higher end event that is reasonably able to occur. The newly revised IEC standards now also include a robustness load case check for extreme metocean conditions where turbines are designed to withstand a short-lived 500-year event (0.2 percent chance occurrence in a single year), such as an extreme 3-sec wind gust. During the 160 years for which weather records have been kept, ten hurricanes have made landfall in Massachusetts and five others have passed through the

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		WDA without making landfall. The latest hurricane that made a direct landfall was Hurricane Bob in 1991. Out of those ten hurricanes, five ranked as Category 1 on the Saffir-Simpson Scale, two were Category 2 hurricanes, and three were Category 3 hurricanes. Since records have been kept, no Category 4 or 5 hurricanes have made landfall in Massachusetts. Of the hurricanes that passed through the WDA without making landfall in Massachusetts, one was Category 2, one was Category 1, and three were tropical storms when they passed through the WDA. The most recent of these storms was Beryl in 2006.
0101-022	Section 3.2.2.3. Page 3-19 Table 3.2.2-3: The estimated years between incidents are smaller than the life of the project, suggesting that BOEM anticipates that there will be small vessel collisions and large vessel collisions. If collisions are anticipated, it may be necessary to discuss culpability (i.e., who is at fault and who pays for vessel or WTG damages). This may affect vessel operators insurance rates and availability.	Section 3.10.2 of the FEIS has been revised to address the topics in this comment.
0101-023	Section 3.3.1.3. Page 3-27: The DEIS states that Vineyard Wind would restore any previously undeveloped areas on land that were disturbed by construction. Elaboration on restoration is necessary; how will the areas be restored?	Section A.8.5.2 in Appendix A of the FEIS has been revised to address the comment.
0101-024	Section 3.3.1.3. Page 3-27: The italicized portion of the following statement requires a citation: “Collisions between animals and vehicles or construction equipment might cause direct mortality. BOEM expects this to be rare, as most individuals should avoid the noise and vibration of the construction areas.”	Section A.8.5.2 in Appendix A of the FEIS has been revised to include a reference citation.
0101-025	Section 3.3.1.3. Page 3-27: It is unclear what reptiles and amphibians are being referred to when discussing limited mobility and vulnerability to construction impacts. The sentence states “reptiles and amphibians mentioned above in 3.3.1.1.”, but no specific species are discussed in the preceding text in 3.3.1.1.	Section A.8.5.2 in Appendix A of the FEIS has been revised to remove the reference.
0101-026	Section 3.3.2.2. Page 3-33: The type of lighting on the WTGs should also be considered as a relevant design parameter that may influence the magnitude of impact on birds.	Section A.8.3.2 in Appendix A (formerly 3.3.2.2) of the FEIS has been updated to include lighting as a relevant design parameter.
0101-027	Section 3.3.2.3. Page 3-34: It is stated that the risk of collisions between birds and vehicles or construction equipment is negligible, as most birds would avoid the noisy construction areas. Research supporting the claim that birds will avoid the noisy areas should be cited.	Section A.8.3.2 in Appendix A (formerly 3.3.2.3) of the FEIS has been updated to include additional citations.
0101-028	Section 3.3.2.3. Page 3-35: The following statement also requires a citation: “Loons, grebes, seaducks, and northern gannets typically avoid offshore wind developments, resulting in loss of habitat and reduced risk of collision.”	Section A.8.3.2 in Appendix A (formerly 3.3.2.3) of the FEIS has been updated to include additional citations.
0101-029	Section 3.3.3.1. Page 3-43: “Conversely, the unprecedented mortality of more than 5.5 million bats in northeastern North America as of 2015 reduces the likelihood of many individuals being present within the proposed project area.” Remove this sentence as it inappropriately downplays that the proposed project	Section A.8.4.1 (formerly 3.3.3.1) has been updated to include a clarifying sentence regarding the biological significance of Project-related mortality within the context of White Nose Syndrome related population declines.

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	may affect bat populations already in poor shape. The preceding sentence sufficiently makes this argument.	
0101-030	Section 3.3.3.9. Page 3-48: It is appropriate [inappropriate?] to state that “existing information seems adequate to assess the potential impacts of the proposed Project,” when “estimates of population size, survival rates, reproductive, rates and other biological parameters are lacking for many species of bats”. This is especially important considering drastic population declines (approaching 90% in some areas) in regional species of bats due to white-nose syndrome.	Section A.8.4 of the FEIS has been revised to provide additional information. The FEIS uses the best available information, and thus complies with the procedural requirements of NEPA to predict potential impacts on bats from the Proposed Action.
0101-031	Section 3.3.5.3. Page 3-62: Has a power analysis been done to confirm that accepted ecological and fisheries methods would be unable to detect population changes with the benthic organism mortality associated with 0.5% of WDA area? This is plausible but citing an analysis would strengthen this argument.	BOEM has not conducted a power analysis to evaluate the sampling intensity needed to detect a change in benthic organism population change. However, Vineyard Wind has used a power analysis to inform the design of its benthic monitoring plan and has conducted a power analysis for the Fisheries Monitoring Plan (SMASST Fishermen Workshops Report, https://www.vineyardwind.com/document-room). BOEM believes that a power analysis is not essential for predicting the level of impact as defined in Section A.8.5 of Appendix A. Therefore, no further revision to the EIS was warranted.
0101-032	Section 3.3.5.3. Page 3-62: BOEM states that they could reduce potential impacts by requiring time-of-year (TOY) restrictions for horseshoe crabs, winter flounder, and bay scallop to protect the spawning period, larval settlement, and juvenile development. BOEM should most definitely implement these TOY restrictions to minimize impacts to all three species.	The FEIS, Section 3.2.2 (formerly 3.3.5.3), has been updated to include monitoring initiatives to ensure documentation of potential effects on benthic resources. Mitigation measures that could be included as a condition of COP approval are included in Appendix D of the FEIS. Note that additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision. Sensitive populations of horseshoe crabs, winter flounder, and bay scallop in Lewis Bay are avoided under the revised COP. No time of year restrictions are currently proposed for Covell’s Beach.
0101-033	Section 3.3.5.3. Page 3-63: Will the fishing industry be notified of all cable and scour protection locations to prevent mobile gear interactions with the new fixed structures?	Section 3.4.5.3 of the DEIS had already stated that Vineyard Wind will communicate where cable is buried and where cable protection is used.
0101-034	Section 3.3.5.3. Page 3-63: “The conversion of soft-bottom habitat to new hard bottom would be unavoidable, but this effect would be localized and should not have a population-level adverse impact on soft bottom communities, while hard bottom communities could increase from the additional substrate.” Will there be monitoring of the soft-bottom habitat prior to construction and of new hard-bottom habitat during and post construction? This information would be valuable to understand...[what] the added hard-bottom habitat does to the local biological community.	FEIS Section 3.2.2 (formerly 3.3.5.3), cites the COP for details on the benthic monitoring plan. BOEM will be coordinating with NMFS on the development of the benthic monitoring plan. The FEIS has been updated to include monitoring initiatives to ensure documentation of potential effects on benthic resources. Mitigation measures that could be included as a condition of COP approval are included in Appendix D of the FEIS. Note that additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0101-035	Section 3.3.5.3. Page 3-64: “BOEM could reduce potential impacts of construction to minor by requiring the following mitigation measures as a condition of COP approval ... : (1) adaptive management involving refinement of exclusion zones, and (2) long-term monitoring to document the changes to the	FEIS Section 3.2.2 (formerly 3.3.5.3), has been updated to include monitoring initiatives to ensure documentation of potential effects on benthic resources. Mitigation measures that could be included as a condition of COP approval are included in Appendix D of the FEIS. Note that additional mitigation measures

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	ecological communities on, around, and between WTG foundations and other benthic areas disturbed by the proposed Project, including the movement of and habitat use of protected species.” Will BOEM implement these measures? Both should occur to minimize biological impacts to the extent practicable.	could be considered by decision makers and incorporated into the Record of Decision.
0101-036	Section 3.3.5.3. Page 3-64: It is argued that impacts related to powered transmission cables will be negligible. Prior to making this statement, it is made clear that there is limited information available on EMF impacts on invertebrates. Therefore, the impacts should be considered as a range (e.g., negligible — moderate) due to the uncertainty associated with invertebrates.	Section 3.2.2 (formerly 3.3.5.3) of the FEIS has been revised and an additional study on the effects of EMF on invertebrates is cited and compared to the proposed Project under Section 3.3.2 of the FEIS.
0101-037	Section 3.3.6.3. Page 3-75: “Although the vertical surfaces on WTG and ESP [(electrical service platform)] monopiles would also introduce a source of new hard substrate, the relatively smooth surfaces of steel monopiles are not expected to be favorable to colonization or reef formation due to their low surface complexity and rugosity (MMS 2009).” This has not been the case with the Block Island Wind Farm. The vertical structures have been heavily colonized by blue mussels. This MMS study is outdated and lessons from the Block Island Wind Farm (the first offshore wind farm in the US, which is situated near the Vineyard Wind Farm) should be incorporated here instead.	Section 3.3.2 (formerly 3.3.6.3) of the FEIS has been updated to include a discussion of mussels on the Block Island Wind Farm.
0101-038	Section 3.3.6.3. Page 3-75 — 3-76: “Localized loss of demersal eggs could lead to reduced fish recruitment; however, this would be limited and BOEM does not anticipate impacts on the flounder stock.” Is this the winter flounder stock? It is unclear based on the current wording. Additionally, what data are available to support his claim. Only Cape-Wind-modeled cable jet plowing trough reconstitution times are presented as justification of recolonization. Again, these data are outdated (2005 and 2009) and lessons learned from the Block Island Wind Farm (including unpublished) would be more appropriate, as findings are more recent and results were measured instead of modeled.	Section 3.3.2 (formerly 3.3.6.3) of the FEIS has been updated to clarify reference to winter flounder stock. In addition, please refer to the EFH Assessment for a discussion of construction related impacts on winter flounder, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/
0101-039	Section 3.3.6.3. Page 3-76: The proposed long-term monitoring to document the changes to ecological communities on, around, and between WTG foundations should occur. However, how does monitoring of changes reduce potential impacts as stated? Does this imply that action will be taken if negative effects to benthic communities are occurring?	Section 2.2.1, Section 3.3.6.3, and Appendix D of the DEIS included a discussion of monitoring and mitigation proposed for the Project. Section 3.3.2 (formerly 3.3.6.3) of the FEIS has provided additional language for monitoring. Additional monitoring requirements and mitigation measures, if any, will be developed in coordination with the NMFS and included in the Record of Decision. Refinement of monitoring strategies (such as changing monitoring zones based on field measurements of noise) could directly reduce construction impacts from this Project, long-term monitoring could indirectly reduce impacts on finfish and invertebrate resources in the region. Information gained via post-construction monitoring by Vineyard Wind could be used to inform Vineyard Wind’s decommissioning procedures, and/or could be used by others planning similar projects in the future, to assist in reducing potential impacts.

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0101-040	Section 3.3.6.3. Page 3-76: “Sub-lethal effects for mollusk eggs occur with an exposure of 200 mg/l for 12 hours; for other life stages, the minimum threshold for sub-legal effects took 24 hours at 100 mg/l.” This is only for single disturbance events. Construction would be ongoing over the course of two years, resulting in regular increased turbidity. Are data available on recurring turbidity events caused by day-to-day construction?	Section 3.3.2 (formerly 3.3.6.3) of the FEIS has been updated to include a discussion of how multiple high turbidity events could affect sessile organisms.
0101-041	Section 3.3.6.3. Page 3-76: While depositions of 0.04 in or greater may occur only in limited spaces, the effect may be more severe than minor. The overlap with the juvenile Atlantic cod habitat area of particular concern (HAPC) is especially concerning, as cod are known for high site specificity in spawning. Siceloff and Howell (2013) contend that Atlantic cod “aggregate around fine-scale bathymetric features on the spawning ground and utilize relatively small areas during spawning.” If one of these spawning areas is smothered, effects will be greater than minor.	Section 3.3.6.3 of the DEIS included a discussion of sediment deposition. Therefore, no changes to the FEIS are warranted. Please also refer to the EFH Assessment for details regarding effects to juvenile Atlantic Cod habitat, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ .
0101-042	Section 3.3.6.3. Page 3-77: “Noise impacts on fish and invertebrates in the WDA and OECC would vary depending on the ability of the fish to detect sound pressure...” This is all true for fish, but there is no discussion of particle motion in this section, which applies to invertebrates that hear by way of statocysts. Further discussion should address pile driving noise impacts on invertebrates.	Section 3.3.2 (formerly 3.3.6.3) of the FEIS has been updated with a discussion of particle motion and why it was not used to assess injury and behavioral effects to fish and invertebrates.
0101-043	Section 3.3.6.3. Page 3-80: Only half of the Hutchinson et al. (2018) paper is described in the EMF section; American lobster impacts are described, but little skate responses to EMF are not discussed. Considering little skates showed a stronger response to EMF than the American lobster, those findings and their implications should be described here.	Section 3.3.2 (formerly 3.3.6.3) of the FEIS has been updated for a discussion of EMF-related impacts on the little skate.
0101-044	Section 3.3.6.10. Page 3-85: Why are the Bay State Wind project and the three more recently leased areas not discussed in the cumulative impacts section? While these projects have not yet secured power purchased agreements, their development is still reasonably foreseeable. Given that the consecutive area leased in Southern New England alone (OCS-A 485, OCS-A 487, OCS-A 500, OCS-A 501, OCS-A 520, OCS-A 521, OCS-A 522) is over 1,400 square miles (and the largest existing contiguous array is closer to 112 square miles — the Walney Wind Farm, UK; Orsted), there is little existing information to compare to this scale of development. Consequently, impacts could be moderate to major.	BOEM has revised the list of reasonably foreseeable future offshore wind projects based on project progress since publication of the DEIS, and this information was included in the SEIS and carried forward to the FEIS. The list of reasonably foreseeable future offshore wind projects is included in Appendix A of the FEIS.
0101-045	Section 3.3.7.3. Page 3-102: How does long-term passive acoustic monitoring help to reduce the likelihood of impacts to marine mammals? Would construction activities be modified if sound levels exceed a certain threshold, as determined through monitoring?	Section 3.4.2 (formerly 3.3.7.3) and Appendix D of the FEIS have been updated to include for a discussion of monitoring and mitigation that has been proposed for the agency-preferred alternative. Long-term passive acoustic monitoring would not reduce the expected impacts on marine mammals, but the data gathered could be used to inform refinement of requirements and potentially lead to additional mitigation measures, if required. Pre- and post-construction

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		monitoring plans, if required, will be developed in coordination with the NMFS as part of the ESA Section 7 consultation.
0101-046	Section 3.4.5.1. Page 3-163: An addendum to the RIDEM 2017 report was released in 2018. The addendum provides total trip values of all trips that utilized each wind lease area. These results should also be considered, as they encompass full trips that may be eliminated altogether if E-W navigation is not feasible. The addendum is provided at the end of the 2017 report, provided here: http://www.dem.ri.gov/programs/bnatres/fishwild/pdf/107-018 . Further, the January 14, 2019 report (attached to this letter) provides the most recent estimate of economic exposure of Rhode Island fisheries in the COP area.	Exposure of Rhode Island fisheries is discussed in the revised Section 3.10.1 of the FEIS, as is the value of port landings harvested from the lease area.
0101-047	Section 3.4.5.1. Page 3-179: The inability of the National Oceanic and Atmospheric Administration National Marine Fisheries Service (NOAA Fisheries) survey vessel to operate within the WDA under any development scenario may affect scientists ability to monitor population changes, which may in turn affect management (e.g. quotas).	Section 3.12 of the FEIS has been revised to include this information.
0101-048	Section 3.4.5.1. Page 3-179: The 500 m temporary restriction zones created by construction are likely to change very regularly. This was a challenge for the Block Island Wind Farm, as construction plans changed constantly in response to a variety of external factors (e.g., weather). Construction vehicle locations and anticipated future locations for each day should be reported to the fishing industry to avoid conflicts, especially with those setting fixed gear... real-time reporting will be necessary to prevent overlaps in activity due to the regular changes in construction schedules.	The DEIS Section 3.4.5.3 had already stated that Vineyard Wind would communicate project construction activities and project schedule and work with the fishing industry to ensure that safe fishing can continue in the WDA.
0101-049	Section 3.4.5.1. Page 3-180: “Vineyard Wind would communicate where and when activities would occur in the OECC to avoid conflicts with fishing activities.” Vineyard Wind should also communicate when fishing can return to the area post cable laying.	DEIS Section 3.4.5.3 had already stated that Vineyard Wind would communicate project construction activities and project schedule and work with the fishing industry to ensure that safe fishing can continue in the WDA.
0101-050	Section 3.4.5.1. Page 3-180 - 3-181: “... construction and installation activities are expected to have a moderate impact on commercial fisheries for for-hire recreational fishing.” Based on feedback from the Rhode Island commercial fishing industry, the RIDEM disagrees with this statement that impacts will be moderate. If proper compensation to those losing access to fishing grounds cannot be achieved, impacts will be major, not moderate. BOEM later states that construction disruption payments would reduce impacts to minor, which downplays the impacts to the Rhode Island commercial fishing industry.	Section 3.10 and Appendix D of the FEIS have been revised to include the Vineyard Wind’s voluntary established gear loss and revenue compensation funds for fishing interests based in Rhode Island, Massachusetts, and other states. Please see Section 3.10 and Appendix D of the FEIS for more details on the measures.
0101-051	Additionally, [mitigation] payments[to commercial fishermen] will only reduce impacts if the developer and the fishing industry can agree on mitigation measures. How does BOEM ensure that this occurs?	Section 3.10 and Appendix D of the FEIS have been revised to include the Vineyard Wind’s voluntary established gear loss and revenue compensation funds for fishing interests based in Rhode Island, Massachusetts, and other states.

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		Please see Section 3.10 and Appendix D of the FEIS for more details on the measures.
0101-052	Section 3.4.5.1. Page 3-180 — 3-181: Does BOEM require compensation to the fishery if there are detected negative biological impacts that result in lower catches or other related cost increases (increased fuel costs due to navigational changes, lower catches due to displacement of fishing vessels into other vessels historic fishing grounds, etc.)? For instance, while BOEM anticipates that impacts to longfin inshore squid caused by construction (pile driving noise, sedimentation, and water quality) will be minimal, the lifespan of a squid may be as short as 9 months. If there are any environmental impacts, a portion of a population could be disrupted, resulting in population-level effects. Considering construction on this project and others in the area are likely to extend many years, there could be impacts at a biological level that lead to reduced catch for fishermen. How will fishermen be compensated for a potential loss of this kind?	Section 3.10 and Appendix D of the FEIS have been revised to include the Vineyard Wind’s voluntary established gear loss and revenue compensation funds for fishing interests based in Rhode Island, Massachusetts, and other states. Please see Section 3.10 and Appendix D of the FEIS for more details on the measures.
0101-053	Section 3.4.5.1. Page 3-181: “A time of year restriction, however, would not result in benefits to squid eggs given that up to 80 squid vessels throughout the year (on average between 40 and 60) are bottom trawling on spawning squid and squid egg mops...” This is only a valid comparison for activities that directly alter benthic habitat (i.e., jet plowing or pile driving). The impacts of sound are more widely distributed than individual trawl tows, as only areas where tows occurred will be affected. To complicate matters further, there are limited data on the impacts of sound to squid eggs.	This comment has been acknowledged in the revised Section 3.10.2 of the FEIS.
0101-054	Section 3.4.5.1. Page 3-182: There should be more discussion on radar interference than is presented. It would be helpful to discuss potential solutions to the problem (new radar systems, courses to demonstrate how to configure a radar within a turbine array, etc.). This is an issue that could also be reduced in severity by situating turbines on lines of latitude, as it would help the vessel operator to understand where to expect turbine foundations and towers in the absence of properly functioning radar.	The DEIS Section 3.4.7.3 had already discussed radar interference and proposed mitigation measures.
0101-055	Section 3.4.5.1. Page 3-182: “In addition, smaller vessels could drift into WTGs or ESP structures during times where steerage is limited due to haul back of gear or loss of power.” Loss of power can occur on vessels of any size and potentially result in an allision.	This has been revised in Section 3.10.2 of the FEIS to clarify the statement.
0101-056	Section 3.4.5.1. Page 3-182: Vineyard Wind should engage with the fishing industry to determine what form of cable armoring (rock placement, concrete mattresses, and/or halfshell) would be the least likely to create new hangs for mobile gear.	This has been revised in Section 3.10.2 of the FEIS to indicate a cable burial risk assessment has been performed.
0101-057	The fisheries scientific community should also be consulted to discuss what [cable armoring] options will be most likely to create habitat suitable for local	The FEIS has been updated to describe scour protection under Section 3.2.2, including a mention of the observation that concrete mattresses at Block Island

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	benthic communities. The concrete mattresses used for the Sea2Shore cable have not been colonized by benthic communities to date.	Wind Farm [Sea2Shore cable] were not readily colonized. The revised Section 3.2.2 also indicates that Vineyard Wind favors rock protection. The FEIS lists potential types of cable protection in Sections 3.1.2 and 3.2.2. In addition, the potential location of cable protection, including cable burial risk assessment is discussed in Sections 3.1.2 and 3.2.2 of the FEIS.
0101-058	Section 3.4.5.7. Page 3-189: When describing the Alternative D2 in the Conclusion, it is not discussed that all other development in the area, including future Vineyard Wind development, is expected to be situated in an E-W formation. The United States Coast Guard (USCG) has recommended a single contiguous pattern for all turbines in abutting sites. The Proposed Action (a diagonal grid) therefore creates challenges to navigation and fishing if the layout is not contiguous with surrounding developments.	Section 3.10 (formerly 3.4.5) of the FEIS has been revised to include additional information on orientation.
0101-059	The DMF estimates that the ex-vessel value of fishing in the Vineyard Wind COP area with an assumed 2 nautical mile (nm) buffer along the north and south boundaries is \$35,611,702.85 for a 30-year period (including lease and construction time)...premised on existing trips...not being taken if the wind farm is constructed in a manner that is not consistent with traditional fishing practices. The 2 nm buffer and loss of the whole trip are assumptions based on feedback from fishermen who prosecute various fisheries in this area.	This information was added to Section 3.10.1 of the FEIS.
0101-060	...A different assumption can be made that only a 1 nm buffer around the COP area would be impacted (Figure 1)...For a buffer of only 1 nm, the value associated with fishing over the 30-year period is \$30,531,599.84 (Table 2). The values in this analysis include ex-vessel value of fishing currently occurring in the COP area plus the buffer per the assumptions stated above and below and do not account for future increases in fish populations, increases in value, or inflation. [Ex-Vessel Value: A measure of the dollar value of commercial landings, usually calculated as the price per pound at first purchase of the commercial landings multiplied by the total pounds landed. https://www.fisheries.noaa.gov/insight/glossary-catch-share-terms#ex-vessel-value]	This information was added to Section 3.10.1 of the FEIS.
0101-061	It is important to re-emphasize that the values presented do not include any shoreside impacts (including crew, fuel, gear, ice, processing, or packaging costs). There are entire businesses that provide these services that may also be affected, and many of these services occur in the major RI ports, which will also see impacts from the offshore wind energy area if fishing is precluded from occurring in this area. Additionally, the value of seafood served at local restaurants has not been accounted for; restaurants may also be affected by changes in seafood availability.	Economic impacts of the fishing industry are acknowledged in the revised Section 3.10.1 of the FEIS.

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0102-001	It is being rushed through with NOT enough info regarding the impacts on Commercial fishing, and SAFE navigation. The current construction and location will destroy lucrative historical fishing grounds and will make navigation an absolute hazard THAT WILL COST Lives one day.	Section 3.10 and 3.11 of the FEIS include a discussion on commercial fish and navigation, respectively.
0103-001	I am worried that our local fishermen do not realize that climate change is a far greater threat to their livelihoods than the wind turbines that are poised to help reduce the carbon emissions responsible for this crisis by providing a substantial amount of clean energy...I urge the stakeholders in the fishing industry to partner with Vineyard Wind in this important renewable energy project.	Thank you for your comment.
0105-001	I am a very big proponent of off-shore wind and the role it can play in reducing our GHG emissions and securing clean energy in close proximity to populated areas, however Vineyard Wind risks poisoning this future by not seriously engaging in minimizing impacts to other stakeholders...Some negative impacts on other stakeholders and fisheries are unavoidable, however care must be taken to ensure that these impacts are managed and greater utility is maximized. This requires coordination and input from other industries and states, something which DOI and BOEM have started to disregard. Transparency is essential in assuring that these inputs are appropriately considered...Vineyard has not and must not be allowed by BOEM and DOI to marginalize other stakeholders and jeopardize the industry's future.	Section 1.1 of the DEIS contained information on the background of the process and project. Appendix C (formerly Chapter 4) of the FEIS has been updated with information on the coordination and consultation process to date for the proposed Project.
0105-002	The layout [Vineyard Wind has] pushed through is needlessly not conducive for fishing and they have been borderline dismissive of any attempts to work on improvements.	Thank you for your comment.
0105-003	Vineyard Wind and BOEM has been taking a very cavalier approach to environmental impacts and not approaching these studies with the rigor and good faith required.	The revised FEIS discusses the current condition of each resource in Chapter 3 and Appendix A.
0107-001	Within the DEIS, impacts are identified as negligible, minor, moderate, and major, and either negative or beneficial. The direction of impacts provided throughout the analysis appears to be left unstated in most or all cases when impacts are negative; it is unclear why this might be, but the approach creates ambiguity. Both the direction and magnitude of impacts should be denoted for each conclusion drawn.	Beneficial impact determinations presented in the FEIS are specified as appropriate. If a determination does not state that the impact is beneficial, it is assumed that the effect is adverse. Table 3-1 and 3-2 include definitions of impacts used for the FEIS.
0107-002	The expected cumulative effects are also described resource by resource, which makes it challenging to interpret important conclusions about how the proposed wind farm will affect all the related resources. BOEM should consider a comprehensive single discussion of cumulative effects rather than a resource-by-resource approach.	The FEIS considers impacts on a resource-by-resource basis because the potential area for impacts, and therefore the potential for the resources' interaction with projects identified in the expanded planned action scenario (Appendix A), varies by resource.
0107-003	Impacts of the Proposed Action and Alternatives are only considered 'major' for three of the affected resources: Environmental Justice, Fishing, and Navigation,	Thank you for your comment.

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	with the comments under Environmental Justice related specifically to fishing issues...BOEM should view fishery stakeholders as amongst their highest priority participants in this process, and that their comments and viewpoints should be carefully considered as the DEIS is revised...	
0107-004	...fisheries stakeholders have expressed significant concerns around their ability to safely navigate within wind farms... related specifically to the possibility of radar interference, the ability to safely fish and transit during severe weather, and the possibility that large number of in-water structures could make search and rescue operations more difficult. We encourage BOEM to collaborate with the United States Coast Guard and the fishing industry to mitigate these concerns.	Section 3.11.2 of the FEIS has been updated to further address the Project's effects on vessel navigation and transit through the WDA. BOEM will continue to collaborate with the USCG and the fishing industry to address these concerns.
0107-005	It is unclear why one-mile spacing and east-west layout are combined as two sub-options under a single alternative, except that both of these alternatives are linked by the need for relatively extensive additional site assessment work should they be selected (this is compared to Alternative C, which would require more limited additional site assessment).	The DEIS analyzed potential effects from two alternatives, D1, 1 nautical mile spacing between turbines, and D2, an east-west orientation with 1 nautical mile spacing between turbines. Both alternatives are related to layout and Chapter 3 and Appendix A of the EIS includes potential effects from both alternatives considered.
0107-006	...we are aware of significant concerns on the part of the fishing industry regarding turbine orientation and spacing, including the desire for wider turbine spacing in designated transit lanes. We encourage BOEM to seek the maximum level of consensus possible among developers and the fishing industry on the layout of the Vineyard Wind project.	Thank you for your comment.
0107-007	...although the Construction and Operations Plan (COP) and DEIS use a design envelope approach...our understanding from Vineyard Wind's public communication is that they intend to use 9.5 MW WTGs for the project. If this parameter has been clearly determined, the analysis in the DEIS could be made more specific to reflect the impacts of using 9.5 MW WTGs.	The development of the EIS has been based on Vineyard Wind's utilization of the PDE, which included a range of 8-10 MW WTGs as assessed in the DEIS and was updated to allow for up to 14 MW WTGs. The FEIS assesses the impacts of the reasonable range of Project designs that are described in the Vineyard Wind COP and presented in Appendix G by using the "maximum-case scenario" process. Therefore, utilization of a 9.5 MW WTG falls within the PDE and impacts have been accounted for.
0107-008	BOEM suggests [in Section 3.3.6] there is plenty of similar surrounding habitat around the project site as justification for assessing various impacts as negligible, minor, and moderate. Is this a reasonable assessment at the present time? Will this statement remain true if all potential sites attractive for offshore wind energy and currently leased offshore Massachusetts and Rhode Island are developed in 30-year project operation window? We suggest that BOEM should think critically about the availability of similar suitable habitats considering the plausible cumulative development of large areas of the continental shelf for wind power.	Section 3.3 (formerly 3.3.6) of the FEIS has been updated to state that the Proposed Action would develop approximately 0.5 percent of the WDA and future wind facilities would likely develop similar proportions of other Wind Lease Areas. The potential impacts are discussed in a revised Section 3.3 of the FEIS.
0107-009	...the assessment of [cumulative] impacts [in Section 3.3.6.10] as 'moderate' for installation and 'minor' for operations are not well justified in the text especially given the likelihood of additional wind projects. It seems plausible that both	A revised Section 3.3 of the FEIS acknowledges the potential for unforeseen impacts. However, the level of potential unforeseen impacts cannot be determined.

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	<p>WTG underwater noise and electromagnetic frequency emissions (EMF) from cables could have ongoing impacts on benthic and demersal species beyond what is currently known, especially because this is the first major project planned for the Northeast U.S. This would argue for a larger range of potential impacts of operations, i.e. minor to moderate, vs. just minor.</p>	<p>Over the years, there have been hundreds of studies conducted at different wind facilities in regards to their impacts on the marine biological environment. Recently there has been work to synthesize the information in these reports (see Thompsen et al 2016 and Bergstrom et al 2014). In addition to these impact assessments, some countries like Belgium and Denmark have funded long-term monitoring programs. These studies broadly show that long-term operational impacts on the marine benthic environment are noted by an increase in animal abundance close to the turbines, and no reported impacts at the OWF scale (Bergstrom et al 2014). In Belgium, monitoring conducted at wind facilities between 2005 and 2016 found the number of epibenthic and demersal-benthopelagic fish species remained similar over the years and was not affected by the construction of the wind facilities. Epibenthic density and biomass showed a similar trend with an increase in the first two years after construction. These higher values however levelled off three years after construction. As for epibenthos, demersal-benthopelagic fish seemed to show more variance in densities only in the first few years after construction. These results indicate that the soft sediment ecosystem in between the turbines (at distances > 200 m) has not measurably changed five to six years after construction and that species assemblages within the offshore wind farms seem to be mainly structured by temporal variability playing at larger spatial scales (e.g., temperature fluctuations, hydrodynamic changes, plankton blooms). Similar to studies in other parts of the North Sea, there were some species of fish that seemed to respond positively to the offshore wind facility, but these potentially positive effects cannot be untangled from the reduction in fishing effort within the wind facility. With the exception of the UK, other European countries have prohibited mobile trawl fishing within offshore wind facilities (something the US does not intend to do).</p>
0107-010	<p>...the list of projects considered to be reasonably foreseeable (Appendix C, table C.1-3) is extremely narrow. It is evident that energy companies have made significant financial investments in developing these areas, even considering areas that have only been leased (Tier 5, leases OCS-A 0520, 0521, and 0522), given that the December 2018 leases commanded record prices at auction. It seems overly conservative to place only projects with approved or submitted permits and plans into the reasonably foreseeable category.</p>	<p>BOEM has revised the list of reasonably foreseeable future offshore wind projects based on project progress since publication of the DEIS, and this information was included in the SEIS and carried forward to the FEIS. The list of reasonably foreseeable future offshore wind projects is included in Appendix A of the FEIS.</p>
0107-011	<p>While turbidity, construction noise, and sediment and water withdrawal may all be considered temporary, operations noise and EMF cannot reasonably be considered as such since the project is expected to operate for 30 years.</p>	<p>Section 3.3.1 of the FEIS has been revised to clarify that EMF and operational noise would be continuous while the Project is in operations.</p>
0107-012	<p>1) None of the ‘relevant design parameters’ listed on page 3-74 are related to ongoing operations. For example, are there limits on operations during certain wind conditions that would affect the ongoing impacts of the project?</p>	<p>Section 3.3.6.2 of the DEIS included the relevant design parameters for the Proposed Action and did not include any potentially variable design parameters related to operations. The FEIS does not warranted any changes to the text.</p>

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0107-013	2) In ‘Construction and Installation of Offshore Components’, there is a comment that “BOEM could further reduce potential impacts as a condition of COP approval, requiring Vineyard Wind to conduct long-term monitoring to document the changes to the ecological communities on, around, and between WTG foundations and other benthic areas disturbed”. We agree that long-term monitoring is critical and should be a condition of COP approval but fail to see how monitoring will reduce impacts, because it will not change the way the windfarm is constructed. However, monitoring would allow Vineyard Wind and BOEM to better understand the effects of wind farm construction and operations on living resources and habitats and could inform decisions about mitigation and the overall management of these resources.	Section 3.3.2 of the FEIS clarifies that monitoring would not reduce the level of construction impact, but could help inform how to reduce the level of impact from decommissioning or the impact of future projects.
0107-014	In ‘Construction and Installation of Offshore Components’, the discussion of pile driving noise impacts is confusing, and Table 3.3.6-1 is not sufficiently explained. We suggest moving this table to an appendix and rewriting this section to more clearly articulate in narrative form what the radial distance and total areal impact of noise damage to species is expected to be. The first paragraph in this section suggests that fish can be physiologically injured by the pile driving noise up to 5.7 miles away, but impacts are assessed as only minor, owing to the impact area being small relative to “overall habitat available”. This conclusion should be thoughtfully evaluated and better justified if it is valid based on available data.	Section 3.3.2 of the FEIS has been revised and includes a discussion of potential effects of pile driving noise.
0107-015	Given that turbines will be operated for 30 years and the way sound travels underwater, there could be more detailed discussion of impacts in the section on ...(page 3-79). The DEIS states “no study has shown any behavioral impact of sound during the operational phase of wind energy facilities ...” but does not clarify whether studies have been done at all, and impacts have not been identified, or is there simply a lack of research on this topic. If there is a lack of research on this issue, it should be added to the list of topics for which information is ‘incomplete or unavailable’, in section 3.3.6.11 (page 3-86). The effects of cable EMF on marine organisms could also be added to this list of topics.	Sections 3.3.2 and 3.3.6 of the FEIS include a discussion of potential effects of operational noise and of EMF. Appendix H includes findings of incomplete and unavailable information.
0107-016	In the Operations and Maintenance section, is light flicker a potential concern? It is not addressed as an impact but has been identified as an issue of concern for land-based wind energy projects. The DEIS should note if this is not an operational concern for marine projects, and why not, or alternatively, should address this issue if there are potential effects on marine organisms.	Sections 3.3.2 and 3.3.6 of the FEIS include a discussion of potential effects of shadow flicker. Appendix H includes findings of incomplete and unavailable information.
0107-017	In the Operations and Maintenance section, reef effects are assessed as ‘moderate’ beneficial impacts. This seems generous based on the lack of information. The DEIS only cites two studies, and one of these indicates that	Sections 3.1.2, 3.2.2, and 3.3.2 of the FEIS have been revised to include additional information on the potential reef effect from the proposed Project and cite a 2018 study by Causon and Gill, among others.

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	monopoles (which are planned for use for part of the project) are not expected to have much of an effect. Given the studies referenced, perhaps an assessment of ‘minor’ benefit is more appropriate.	
0107-018	BOEM focuses on relatively direct effects that could impact fishing operations, including reduced access to fishing grounds, competition over alternate fishing locations, the potential for allisions with structures and cables, etc. There is limited discussion of how fisheries might be indirectly affected if fish populations decline or shift as a result of wind farm construction or operations. These population-level effects are difficult to estimate and will be difficult to attribute to any specific wind farm project, but this issue should be discussed in the EIS to the extent possible.	As discussed in the revised Section 3.3.2 of the FEIS, populations of soft-bottom species are likely to be unaffected, while populations of hard-bottom species are likely to increase.
0107-019	A major question facing the fishing industry is how effort may shift as a result of the windfarm. The DEIS does not reference any studies or experience from other regions on whether or how well fishing operations may be able to continue within offshore wind project areas. The DEIS should reference any lessons learned from the Block Island Wind Farm, as well as from wind farms in Europe. It would be helpful to include this type of information to support the conclusion that displacement will have a moderate impact.	Lessons learned from the Block Island Wind Farm are now included in Section 3.10.2 of the FEIS.
0107-020	...the possibility of ‘Disruption to Fishing’ doesn’t include any consideration of whether fishermen’s insurance policies would constrain their ability to fish within WDA. These concerns have been raised to the Councils by fishery stakeholders. We suggest that the EIS acknowledge this issue and provide an assessment of whether this is a valid concern.	This information was added to Section 3.10.2 of the FEIS.
0107-021	1) In the Regional Setting section (3.4.5.1), conclusions about the magnitude of different types of fishing in either the Wind Energy Area (WEA) or WDA are uncertain, and vessel trip report and vessel monitoring system data each have important limitations. These uncertainties should be referenced in the DEIS. Section 3.4.5.12 on page 3-194 describes these caveats very briefly, but this paragraph would be more useful in the section where the fisheries data are presented and could be expanded upon.	The report acknowledges that VMS and VTR data collection methods have different benefits and limitations. Both VMS and VTR sources are included in the FEIS. Please see the revised Section 3.10.1 (formerly 3.4.5.1) of the FEIS.
0107-022	Pages 3-179 through 3-181 discuss potential disruption of fishing associated with construction. The DEIS concludes that compensation will help to offset impacts to fisheries, but also notes on page 3-181 that the Construction and Operations Plan provides insufficient detail to determine the effectiveness of these compensation programs. The reliance on compensation programs to mitigate impacts despite a lack of clarity about how they would operate is concerning.	Section 3.10.2 of the FEIS has been revised to include a discussion of displacement and potential conflict over fishing grounds and voluntary compensation. Section 3.10 of the FEIS has been updated to include details of mitigation and monitoring measures relative to commercial fisheries, including voluntary financial compensation. Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.

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0107-023	3) On page 3-182 the section heading ‘Navigation – Port Impacts’ seems inaccurate, since this section includes impacts of navigation constraints on fishing activities, not just on ports.	The impact on ports is discussed in terms of impacts on fishing vessels and their access to infrastructure. Section 3.10.2 of the FEIS has been revised.
0107-024	5) On page 3-183, there is a lengthy discussion of trip costs, but then these data aren’t used to project increased costs associated with potential effort displacement and changes in transiting behavior. We suggest that these trip cost data could be better utilized to estimate impacts, and to justify why this is a moderate vs. major impact, since fuel costs are a key element of trip costs.	The trip cost data was provided to illustrate the scale of costs likely involved but there is significant uncertainty and variability in specific vessel costs and how vessels will travel (transit through the WDA or avoid it). Individual vessel fishing costs will vary with transit routes, area fished, etc. No change since DEIS.
0107-025	6) On page 3-184 in reference to fishing vessel displacement issues, it says that “BOEM expects that disruptions to access or unavailability of fish as a result of the Proposed Action during operations and maintenance may be limited to pelagic fisheries and highly migratory species”. Based on previous comments in this section of the DEIS and on our own knowledge, a variety of fishing vessel types may be impacted by displacement, and availability of other species, particularly sessile species, may be reduced. This sentence should be reworked if the meaning is not as intended.	Section 3.10.2 of the FEIS has been revised to address displacement.
0107-026	7) In the following paragraph on page 3-184, effects of hanging up on project infrastructure are described as moderate for mobile and for-hire recreational gears, but minor for fixed gear fishermen. It is counter-intuitive that for-hire recreational fishing with hook and line would be as likely as mobile bottom-tending gear fishing to have moderate negative impacts due to interactions with infrastructure, particularly with respect to cables.	Section 3.10.2 of the FEIS has been revised to include additional information on the risk of damage or loss of deployed gear as a result of the operations and maintenance to have a moderate to major effect on mobile and fixed gear commercial fisheries and for-hire recreational fishing.
0107-027	8) In the fourth paragraph on page 3-184, BOEM refers to pelagic resources as especially interannually variable, but the description of the affected environment for the commercial and for hire fishery component describes variability across many fisheries, including those for demersal species. The focus here on pelagic species seems inconsistent with the earlier discussion. The comments from item 2 above about compensation being relied on to reduce impacts from moderate/major to minor/moderate apply here as well; without a clear sense about how the compensation program will work, and that it will be effective, it is difficult to reach a conclusion about the resulting reduction in impacts.	Section 3.10.2 of the FEIS has been revised to include a discussion of displacement and potential conflict over fishing grounds and voluntary compensation. Section 3.10 of the FEIS has been updated to include details of mitigation and monitoring measures relative to commercial fisheries, including voluntary financial compensation. Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0107-028	9) Tables 3.4.5-10 and 3.4.5-11 that summarize the impacts of each alternative considered across the different aspects of commercial and for-hire fisheries are not very effective, because the impacts are the same across all the alternatives, except for Alternative F. It would be much more useful to discuss the additive impacts of a range of plausible combinations of Alternatives B-F in addition to the impacts of Alternative A.	Please see Section 2.4 and 3.10.8 of the FEIS, which discusses the Preferred Alternative.
0107-029	10) In the cumulative impacts on page 3-193, there are a very large number of potential WTGs (232) that are considered Tier 3 and therefore not reasonably	The SEIS considered a broad range of potential reasonably foreseeable planned actions. The basis of the SEIS was carried forward to the FEIS.

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	foreseeable, which again, seems an overly conservative estimate of foreseeable future projects. Understanding the overlaps in fisheries uses between the Tier 1, 2, and 3 projects would provide a more realistic sense of how wind farm development might affect fisheries in the coming years, even if these projects are less certain. The discussion about affected fisheries the South Fork Wind Farm project area (last paragraph on page 3-193) is very useful. Including these additional projects could increase impacts from moderate to major to major.	
0107-030	11) Section 3.4.5.12 describes 'Incomplete or Unavailable information'. Not mentioned in this section is the substantial uncertainty surrounding whether or how well it will work for fishing operations to take place in and around WTG and the cables. This seems like a huge gap in available information that is fundamental to estimating the magnitude of impacts to commercial and for-hire fisheries.	Section 3.10.2 of the FEIS has been revised to include a discussion on maneuverability of fishing within the WDA. Appendix H of the FEIS includes a discussion on Incomplete or Unavailable Information for each resource.
0107-031	Section 4.2.5 describes consultation with the NMFS on development of the EIS. It would be useful for this section to summarize coordination with NMFS on non-EFH aspects of the analysis. It would also be useful to include the draft EFH assessment as part of the DEIS for review by the public.	Sections C.1.2.2.1, C.1.2.5, and C.1.2.6 in Appendix C in the FEIS have been updated on the status of NMFS coordination and consultation as part of the EIS. The EFH Assessment has been incorporated by reference and summarized in the EIS. The EFH Assessment can be found on at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ .
0108-001	The Marion Institute...supports the Vineyard Wind project in New Bedford, MA. Wind energy is a sustainable resource that generates no pollution or hazardous waste and therefore has a direct and immediate benefit to health impacts associated with air pollution, such as asthma. With wind power, the region can reduce CO2 emissions.	Thank you for your comment.
0109-001	I am writing to express my strong support for the Vineyard Wind Project... I am writing on behalf of my own family and also as a member of Elders Climate Action (ECA) on the Vineyard... The power provided by Vineyard Wind will make an important contribution toward ECAs goal of a livable future, reducing CO2 emissions by over one and a half million tons annually and powering almost half a million homes.	Thank you for your comment.
0109-002	The Vineyard Wind project is the product of many years of planning and consultation. It has taken community concerns, interests, and needs into account.	Section 1.1 of the DEIS contained information on the background of the process and project. Appendix C (formerly Chapter 4) of the FEIS has been updated with information on the coordination and consultation process to date for the proposed Project.
0109-004	Concerns about turbine spacing in the waters have been addressed.	Thank you for your comment.
0109-005	Turbines will be well off-shore, out of sight, and not a visual impediment.	The DEIS addressed this in Section 3.4.4.3. Therefore, no change to the FEIS is warranted.
0110-001	...please see it fit to eliminate the possibility of any transmission cables to ever be layed through Lewis Bay.... There are multiple alternatives of landing sites that are well prepared to accept the cables, ie; [Brayton] Point as one.	As specified in Section 2.1 of the FEIS, the DEIS, and SEIS contemplated two Onshore Export Cable Routes (OECRs), with alternative options within each route; however, since the publication of those documents, Vineyard Wind has

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		stated all necessary state and local permits for the Covell's Beach landfall location have been acquired. Therefore, the Proposed Action (Alternative A) and action alternatives only contemplate the one landfall location, Covell's Beach landfall and onshore route. Alternative B therefore is no longer evaluated as an action alternative in this FEIS. In addition, Section 2.5 of the FEIS has been included to identify the agency-preferred alternative.
0110-002	Lewis Bay is very shallow with scallop beds, clam flats, oyster farms, migrating fish stocks, seals feeding in the autumn, many beaches for swimming and recreation. Boating, which includes 2 sailing schools, Hyannis yacht club which send many sail boats out on the water each day. With lessons and many regattas, along with this there power boating, water sports, skiing, wake boarding, kite boarding, wind surfing, kyacking and what ever else you can name for water activities.	As specified in Section 2.1 of the FEIS, the DEIS, and SEIS contemplated two Onshore Export Cable Routes (OECRs), with alternative options within each route; however, since the publication of those documents, Vineyard Wind has stated all necessary state and local permits for the Covell's Beach landfall location have been acquired. Therefore, the Proposed Action (Alternative A) and action alternatives only contemplate the one landfall location, Covell's Beach landfall and onshore route. Alternative B therefore is no longer evaluated as an action alternative in this FEIS
0110-003 there is the main navigatiion channel into the Bay that is one of the main supply routes to the islands and the passenger ferries that transport the multitude of vacationers to and fro. What would happen if this was to interrupted, island commerce would suffer. There is also the major problem of shifting sands from winter storms, the possibility of hurricanes, that could upheave any cables and pose a danger to the users of Lewis Bay.	As specified in Section 2.1 of the FEIS, the DEIS, and SEIS contemplated two Onshore Export Cable Routes (OECRs), with alternative options within each route; however, since the publication of those documents, Vineyard Wind has stated all necessary state and local permits for the Covell's Beach landfall location have been acquired. Therefore, the Proposed Action (Alternative A) and action alternatives only contemplate the one landfall location, Covell's Beach landfall and onshore route. Alternative B therefore is no longer evaluated as an action alternative in this FEIS.
0111-001	I am writing to express my wholehearted support for the Vineyard Wind project, and to urge the BOEM to minimize delays in the permitting process to the greatest extent possible. This project, and indeed the development of offshore wind as a major source of renewable, clean energy, is of the utmost importance to the citizens of the Commonwealth of Massachusetts, the United States, and the entire world. It is the single largest opportunity we have to replace coal, oil, and gas as primary sources of electricity in the eastern United States...before it is too late to counter the effects of climate change.	Thank you for your comment.
0111-002	A number of concerns have been raised regarding the projects possible impact to marine life and navigational safety. Those unknowns must be respected, and thoughtfully accounted for by the offshore wind operators. Vineyard Wind is doing so. [Offshore wind power] it has been in commercial use globally for nearly 30 years...there is no evidence to indicate significant hazards to marine life and to maritime navigation than cannot be effectively mitigated with techniques in use today.	Thank you for your comment.
0112-001	We write to submit comments in support of the Vineyard Wind offshore wind farm proposal. As the United States' first large-scale offshore wind farm, this	Thank you for your comment.

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	project will deliver invaluable benefits to our districts by protecting our environment and creating a new green economy for the Cape and the Islands.	
0112-002	Since 2010, Vineyard Wind has worked extensively within our communities to increase local involvement in the planning and development process through dozens of forums and public events. Vineyard Power Cooperative signed the first offshore Community Benefits Agreement with Vineyard Wind in January of 2015... Since then, the Vineyard Wind Connector Projects has conducted extensive and sustained outreach...Vineyard Wind recently signed a Host Community Agreement (HCA) with the Town of Barnstable. This agreement establishes a cooperative relationship between the town and the Company to bring power to shore on the Cape, to provide resiliency...while providing extensive economic benefits...ensures the town’s active involvement in reviewing...operations, ensuring protection of local environmental resources.	Thank you for your comment.
0112-004	Approving and implementing the Vineyard Wind Project will be a tangible demonstration of our commitment to chart a clean energy future... This will be a vital step in meeting our renewable energy and greenhouse gas reduction targets, and protecting our fragile coastal environment...this project will not only help transition our energy supply to renewable sources and support our local economy, but will critically enhance the reliability of power supply across the Cape and Island.	Thank you for your comment.
0112-005	We recognize that with any construction project there will be short-term disturbances to residents along the land cable routes, but Vineyard Wind has actively engaged public works and public safety officials in Barnstable as well as state transportation officials to minimize disturbance.	Thank you for your comment.
0112-006	Vineyard Wind has also committed to a Resiliency and Affordability Fund... This fund will contribute \$1 million annually for 15 years to provide substantial and self-sustaining benefits to local towns...	Section 3.4.1.3 of the DEIS provided information on the proposed Resiliency and Affordability Fund. Therefore, no change to the FEIS is warranted.
0112-007	We cannot afford to overlook the enormous economic benefits of this project, which will help sustain a year-round economy for the Cape and Islands.	Section 3.6.2 of the FEIS has been updated to include information on the benefit of year-round jobs for Duke’s County.
0112-008	Vineyard Wind’s successful development is crucial to fulfilling [state renewable energy goals].	Thank you for your comment.
0113-001	It should be noted that the total annual associated economic impact of the Atlantic Surfclam and Ocean Quahog industries has been calculated in excess of \$1.3 billion ¹ with major portions of the harvests coming from within Southern New England. It is important that offshore wind is developed in a manner that does not unnecessarily harm the Atlantic Surfclam, Ocean Quahog or any fishing industries..great care must be taken to preserve and manage these waters with sound science and reasoning.	The importance of the surfclam and ocean quahog industry is discussed in Section 3.10 of the FEIS and potential impacts on shellfish resources are assessed in Section 3.3.2 of the FEIS.

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0113-002	The DEIS fails to properly and completely analyze all instances of unavoidable adverse impacts associated with the proposed action which will impact the Atlantic Surfclam and Ocean Quahog (SC/OQ) Fisheries. ... In many cases literature reviews, syntheses, and workshops will not yield the necessary data needed to determine the environmental impacts because little research has been done in many areas, noted herein, that are of concern. Field surveys, empirical studies, and ecosystem modeling must be conducted to address these concerns before BOEM can prepare a complete, comprehensive and accurate FEIS.	Potential impacts on individual stocks are beyond the scope of this document. However, the revised Section 3.3.2 of the FEIS describes applicable research regarding field studies, empirical studies, and ecosystem modeling of the effects of offshore wind energy development. The information available is sufficient for predicting the impacts required in a NEPA analysis.
0113-003	The introduction of areas containing wind arrays will complicate navigation for vessels in the areas of wind arrays and make transiting the areas in and around wind farms more dangerous. Traffic management systems, AIS transponders on fixed structures, wind farm monitoring, crew training and tugs available for emergencies could reduce risks associated with navigation near wind farms but will not eliminate the risks. Traffic management systems for all wind farms must be designed by the United States Coast Guard to determine what will be necessary for safe navigation in and around wind arrays.	Section 3.11.1 of the FEIS has been updated to include the findings of USCG's Final MARIPARS.
0113-004	A 2 nm wide transit lane through a wind farm will not provide the necessary measures of safety for mariners; nothing less than a 4nm traffic corridor should even be considered as adequate for this area unless the process of determining safe traffic corridors is handled by the U.S. Coast Guard. Only the U.S. Coast Guard has the expertise and should be engaged in a study of the potential traffic density and the need for vessel traffic routing measures for the Vineyard Wind Farm and any other wind farms planned off our coasts...It should be the Coast Guard that proposes to BOEM, routes through WEAs that follow very nearly the routes currently being used by both fishing vessels and commercial vessels alike as they transit the area. The Coast Guard should work with BOEM towards finding routing solutions with appropriate traffic lane widths, set-backs and areas of separation that balance the many competing demands, will ensure an appropriate level of safety and will avoid impediments to vessels traveling along designated routes through WEAs.	Sections 2.1.1.2 and 3.11 of the FEIS have been updated to discuss the 2-nautical-mile-wide northeast-southwest navigational safety corridor identified by the Massachusetts Fisheries Working Group on Offshore Wind, as well as the USCG's Final MARIPARS that evaluated the need for establishing vessel routing measures to enhance navigational safety. Section C.5 in Appendix C of the FEIS, has been clarified to indicate that a 2 nautical mile transit corridor or greater was an alternative considered but not analyzed in detail and explained why it was discounted further.
0113-005	Design modifications such as East-West orientation, adequate turbine spacing of 2nm so that larger vessels can harvest within the wind lease areas, and transit lanes determined by the U.S. Coast Guard are all absolutely feasible within the economic parameters, particularly if VW will request a short extension of its Power Purchase Agreement with the State of Massachusetts.	Section 2.1 of the DEIS described the Proposed Action and Alternatives considered. The suggested design modifications would create permitting delays and Project risk due to the need for additional surveys for some or all of the Project area, which would be inconsistent with EO 13807 in addition to impacting the proposed Project's ability to meet the requirements of its power purchase agreements, potentially foreclosing its economic feasibility. In addition, the suggested design modifications would involve turbines being outside the lease area and would essentially constitute a different proposal. This would therefore not meet the purpose and need of this EIS, and would effectively be the same as selecting Alternative F (No Action).

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0113-006	The proposed spacing of the turbines and inter-cable arrays, capable of carrying 66,000 within the Vineyard Wind Farm will have unavoidable major adverse impact to the Atlantic Surfclam and Ocean Quahog Fisheries. The area within the Vineyard Wind Farm will no longer be able to be safely or efficiently harvested when the wind farm is in operation. The SC/OQ biomass is patchy, vessels need large spatial areas to locate and harvest clams. The gear type and vessel size used in the SC/OQ fishery has a minimum operability threshold that will not permit vessels to work within wind energy areas with turbine spacing of ≈ 1 nm.	Maneuverability with the WDA would vary depending on the fishing gear and species targeted. Although it is expected that initially it would be more challenging for some fisheries to operate in the WDA, with time, most fishermen would adapt to WTGs spacing and would be able to fish successfully in the WDA.
0113-007	What is the impact of a crewmember or fishing vessels coming into contact with a broken 66,000-volt cable...	Direct contact with the OECC cable could potentially cause damage to fishing equipment or vessels, as well as potential severe injury or death. Vineyard Wind would bury the inter-array cables (connecting the WTGs and the ESPs within the WDA) and export cable to a target burial depth of 5 to 8 feet (1.5 to 2.5 meters). Vineyard Wind anticipates no more than 10 percent of the cables may not achieve the proper burial depth and would require cable protection in the form of rock placement, concrete mattresses, and/or half-shells. Such covers can change the fish habitat (soft-bottom habitat to hard-bottom habitat) and can also damage fishing gear and equipment, which in turn could cause a potential safety hazard should gear snag or hook on seabed structures.
0113-008	The DEIS states that there will be “Minor impacts on scientific research and surveys in all Project phases.” As concerns the Atlantic Surfclam and Ocean Quahog fishery scientific research and biomass surveys, this is incorrect, the impacts will be major within the Vineyard Wind offshore wind farm. The operation of the Vineyard Wind offshore wind farm with turbine spacing of ≈ 1 nm will present navigational obstructions for clam and fishery surveys. Vineyard Wind and other developments with similar spacing will collectively prevent scientific research and surveys in the cumulative wind energy areas... Stock assessments are heavily based on data coming from regular clam surveys and biannual bottom trawl surveys performed by National Marine Fisheries Service North East Fisheries Science Center on the commercial vessel ESS Pursuit and the research vessel Henry B. Bigelow. The stratified random design that the survey has followed for the past several decades will be impacted by the ship’s limited accessibility to the wind farm(s), whether it is unable to tow within a certain distance of each turbine or unable to tow anywhere in the entirety of the wind farm...Changes to surveys result in greater scientific uncertainty in a stock assessment. Additional uncertainty will cause the Fishery Management Councils to reduce quotas fishery-wide. Moreover, developing novel stock assessment methods to accomodate lost survey area will take significant time and resources.	Section 3.12.1 of the FEIS has been revised to include information on conducting biological/stock surveys in the WDA.
0113-009	... wind farms are expected to act as aggregating structures for many MAB species, and it is unclear if that is likely to be an attraction effect that might affect the location of animals but not necessarily total abundance, or if it could create	Section 3.12.1 of the FEIS has been revised to include information on conducting biological/stock surveys in the WDA.

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	new habitat that might affect total species abundance. This has the potential to disrupt a long-standing and important time-series of fisheries data, and the new uncertainties could have a significant impact on management decisions and fishery allocations...These impacts can be mitigated somewhat by spreading the turbines out a minimum of 2nm so that survey vessel can sample within the wind farm(s).	
0113-010	The DEIS requires a 5-8 ft burial depth of inter-array cables. This is inadequate based on last summer's Block Island cable exposures. ... monitoring [of cable placements] should be independently conducted or verified on a biannual basis.	Section 2.1.1 of the FEIS has been updated to address cable burial risk for the proposed Project. The OECC would have a target burial depth of up to 5-8 feet (1.5-2.5 meters). Appendix D of the FEIS has been revised to address monitoring of cable burial.
0113-011	No protective equipment such as circuit breakers, fuses and relays are mentioned for the electrical system that will pose a grave danger to commercial fishermen in the event the vessel's gear or a crewmember comes into contact and breaks the electric cables.	As discussed in the DEIS, cables will be buried or covered with protective material to reduce any potential contact from fishing gear or anchors. The cables are heavily reinforced to reduce damage if disturbed. Safety precautions for potential contact with the cables will be specified in the FDR and FIR.
0113-012	Decommissioned cables left in place will eventually become a hazard to commercial fishing vessels and plans and funds to remove all debris, including cables, must be allocated now...If Vineyard Wind puts material in the ocean decommissioning plans should be made for its removal before construction begins.	As described in Section 2.1.1.3 of the FEIS, pursuant to 30 CFR Part 585 and other BOEM requirements, Vineyard Wind would be required to remove or decommission all installations and clear the seabed of all obstructions created by the proposed Project. Vineyard Wind would need to obtain separate and subsequent approval from BOEM to retire any portion of the Proposed Action in place.
0113-013	Multi-decadal projections of spatial shifts stock and fishery, relative to wind energy installation locations must be considered when consequences to fisheries associated with these projects. These analysis must be done before the likely environmental impacts can be reasonably estimated for the operational period of the project. To Implement a financial compensation program only for documented loss of income due to inability of fishing vessels to access previously fished locations within the WDA is inadequate in a region of rapid climate change and associated shift in fisheries. Loss of grounds will impact all harvesters as all harvester lose the fishing opportunity associated with the area, as those displaced from one area move to another and the available grounds are consolidated for all harvesters.	Potential impacts on individual stocks are beyond the scope of this document. Multi-decadal projections of fishery behavior and economics are beyond the scope of this document, which already analyzed in Section 3.3.5 of the DEIS the economic exposure of commercial and for-hire recreational fishers who use the WDA. Further revisions to the FEIS were not warranted.
0113-014	...the extent to which windfarms could affect recruitment behavior in bivalves is unknown...Compensation that is restricted to a demonstrated loss of net revenue due to inability to access fishery resources within the WDA does not account for the loss potential of sustained consequences to early life history stages of shellfish as a direct result of the WDA.	As discussed in the revised Section 3.3.2 of the FEIS, a field survey of a Dutch wind farm found no effect of the wind farm on bivalve recruitment (Bergman et al. 2010). The revised Section 3.3.2 of the FEIS also indicates that the rate of egg and larval survival to adulthood for many species of marine organisms is very low (MMS 2009), and mortality of larvae as a result of the proposed Project would not likely be significant.
0113-015	Bivalve larval settlement and metamorphosis are highly sensitive processes for which nearly nothing is known about the role of the soundscape but the	As discussed in the revised Section 3.3.2 of the FEIS, offshore wind farms have been demonstrated to increase biomass of bivalves near turbines.

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	possibility for major potential negative impacts is real and must be researched before these environmental impacts on clam larvae are known. Acoustic alteration by wind farms may create zones where settlement or metamorphosis may be unavoidably distorted	
0113-016	The Nantucket Shoals and New England Shelf appear to be the source of the coldest water found in the MAB in late winter, yet the potential of unavoidable environmental impact, of the Vineyard Wind Farm on the Cold Pool isn't even discussed in the DEIS. The projected impact of the Vineyard Wind Farm, and the cumulative impacts of multiple projects, on stratification and cold pool stability must be examined...To ignore the Cold Pool as an Essential Fish Habitat is simply negligent; not modeling the likely impacts of the removal of wind energy from this region and the impacts of the wind farm wake effects of this project and those projects likely to follow is irresponsible.	Waters of the cold pool are not included in any designated EFH. A revised Section 3.3.2 of the FEIS mentions that WTGs could affect mixing and the thermocline, and discusses the potential consequences for the cold pool and marine organisms.
0113-017	It is our opinion that the true environmental impacts of this and other wind energy areas will be much worse than those described in the DEIS. We encourage BOEM to require Vineyard Wind to pay \$500,000 annually into a Regional Scientific and Monitoring Program. If construction is allowed to proceed on this fast track schedule, adequate time is not being allowed for the meaningful environmental research needed to proceed responsibly.	Section 3.10 and Appendix D of the FEIS have been revised to include the Vineyard Wind's voluntary established gear loss and revenue compensation funds for fishing interests based in Rhode Island, Massachusetts, and other states. Please see Section 3.10 and Appendix D of the FEIS for more details on the measures.
0113-018	...the DEIS doesn't address potential impacts to the water column of removing large amount of wind energy from the atmosphere layer above. Extracting energy from wind changes regional air currents, which can in turn affect how the nearby ocean circulates, according to Goran Brostrom of the Norwegian Meteorological Institute in Oslo. In a paper published in 2008 in the Journal of Marine Systems, Brostrom shows in a model that winds swirling at 11 to 22 miles per hour downwind of large farms are uneven. As they blow over the ocean, they can roil the waters, causing upwelling.	Brostrom (2008) postulates that upwelling may "strongly influence the local ecosystem," but concedes that further studies are needed to determine wind farm influence on the upper ocean. Further, Clark et al. (2014) state that the phenomenon of upwelling caused by wind farms has yet to be explored. Appendix E in the FEIS has been updated to address the potential atmospheric and oceanic impacts associated with offshore wind facilities. Please see Sections E.2.6 and E.4.4 of Appendix E of the FEIS, which has been revised.
0113-019	When does BOEM address the cumulative impacts of multiple projects on an ecosystem level? The development of the adjacent lease sites is foreseeable and cannot be simply ignored. When does the full-WEA analysis occur? Only a total disregard of our environment would permit simple incremental analyses, never determining the impact if the full goals of the states for offshore energy in the mid-Atlantic Bight / Southern New England are realized compared to a true "no action" of not having wind energy facilities in this area at all.	BOEM has revised the list of reasonably foreseeable future offshore wind projects based on project progress since publication of the DEIS, and this information was included in the SEIS and carried forward to the FEIS. The list of reasonably foreseeable future offshore wind projects is included in Appendix A of the FEIS.
0113-020	The DEIS has failed to address the multiple impact factors from the proposed project working together to impact fish and fisheries on an ecosystem level. If fish stocks are subject to scour, sedimentation, changes in currents, increase temperature, EMF, substrate change, and turbine noise how is survivability cumulatively impacted?	The potential effects of wind farms on offshore ecosystem functioning are discussed in the revised Section 3.3.2 of the FEIS, along with three recent modeling studies that generally indicate that offshore wind farms can provide positive impacts on local ecosystems.

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0113-021	All layout alternatives presented in the Vineyard Wind COP will turn the entire area into a no-go zone for the Atlantic Surfclam and Ocean Quahog Fishery...While fishermen should be compensated for exclusion from fishing during any project phase, direct, one-off negotiations with those in the SC/OQ industry are inappropriate. ...the entire SC/OQ harvest industry should be compensated appropriately. U.S. Fisheries are all different, mitigation and compensation plans can't be one size fits all and the compensation plan described in the Vineyard Wind COP will not work for the Atlantic Surfclam and Ocean Quahog industry.	Section 3.10 and Appendix D of the FEIS have been revised to include the Vineyard Wind's voluntary established gear loss and revenue compensation funds for fishing interests based in Rhode Island, Massachusetts, and other states. Please see Section 3.10 and Appendix D of the FEIS for more details on the measures.
0113-022	... the ecosystem impact of this farm and the cumulative impacts of multiple projects on an ecosystem have the potential to have catastrophic consequences to our industry. What is the compensation plan if that happens? There has not been any ecosystem modeling to see what it would mean to take 8 or 9 gigawatts of wind energy from the ecosystem or what the wake effects would be on the cold pool with that many turbines in our oceans right on top of the most productive fishing grounds on the U.S. Eastern Seaboard.	Sections 3.2.2, 3.3.2, and 3.10.1 of the FEIS have been revised to include additional details on the potential habitat impacts resulting from proposed Project and the action alternatives. Furthermore, Sections 3.3 and 3.10 of the FEIS have revised the discussion of impacts on fish species and commercial fisheries, respectively. Further discussion of impacts is provided in Appendix A of the FEIS.
0113-023	we would like to see comparative environmental impact analyses with putting wind farms inshore or on land. Putting such large-scale wind energy projects in the middle of such a rich ecosystem and to determine that impacts will only be minor to moderate without the necessary analyses is purely speculative.	As stated in Section 2.1.7 of the DEIS, alternative locations for the wind energy facilities outside of lease OCS-A 0501 was an alternative considered but not analyzed in detail and explained why it was discounted further.
0113-024	we hope that this process can be slowed down so that the necessary research and ecosystem modeling can be done to properly and completely, analyzing all instances of unavoidable adverse impacts, noted herein, associated with the proposed action.	As stated in Section 1.3, EO 13807 on Establishing Discipline and Accountability in the Environmental Review and Permitting Process for Infrastructure Projects states that it is the policy of the Federal Government to complete all federal environmental reviews and authorizations for major infrastructure projects, such as the proposed Project, within 2 years of the publication of the NOI.
0114-001	I am reaching out to you in favor of this upcoming project...This project is a step in the right direction towards becoming sustainable and environmentally friendly...	Thank you for your comment.
0114-003	It also will reduce 1.6 million tons of carbon which is not only beneficial for our environment but for our health, reducing asthma, various cancers, diseases and many other illnesses that have been contributed to the burning of fossil fuels.	Section A.8.1 in Appendix A of the FEIS has been revised to include an analysis using EPA's AVERT and COBRA tools to assess air quality and health benefits.
0115-001	On January 22, 2019, Vineyard Wind signed a landmark agreement with NRDC, NWF, and CLF to deploy additional mitigation measures to protect the North Atlantic right whale during activities pertaining to the Project's construction and operations...We strongly recommend that BOEM incorporate these planned mitigation measures detailed in Attachment A into the FEIS, re-running the analysis to accurately factor these actions into the agency's assessments of	Section 3.4.2 of the FEIS has been revised in coordination with NMFS and includes the proposed mitigation and monitoring measures for marine mammals. Furthermore, Section 3.4 and Appendix D of the FEIS include the draft Incidental Harassment Authorization measures proposed to be issued under the MMPA.

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	potential impact levels and evaluations of mitigation measures for other protected and endangered species.	
0115-002	Fundamental to satisfying NEPA’s requirement of fair and objective review, agencies must ensure the “professional integrity, including scientific integrity,” of the discussions and analyses that appear in environmental impact statements. To this end, they must make every attempt to obtain and disclose data necessary to their analysis. The simple assertion that “no information exists” will not suffice; unless the costs of obtaining the information are exorbitant, NEPA requires that it be obtained. Agencies are further required to identify their methodologies, indicate when necessary information is incomplete or unavailable, acknowledge scientific disagreement and data gaps, and evaluate indeterminate adverse impacts based upon approaches or methods “generally accepted in the scientific community.” Such requirements become acutely important in cases where, as here, so much about an activity’s impacts depend on newly emerging science. Finally, NEPA does not permit agencies to “ignore available information that undermines their environmental impact conclusions.” Thus, BOEM’s review must be thorough and must abide by the legal standards discussed above.	The DEIS and FEIS include all currently available information and/or survey information that BOEM requires as part of the COP development. In addition, BOEM has an extensive environmental studies program, which it uses to fill data gaps. Pursuant to 40 CFR § 1502.22, when an agency is evaluating reasonably foreseeable significant adverse effects on the human environment in an environmental impact statement and there is incomplete or unavailable information, the agency shall always make clear that such information is lacking. Appendix H of the FEIS includes a discussion on Incomplete or Unavailable Information for each resource.
0115-003	...BOEM needs to rigorously review the potential impacts of offshore wind development on marine wildlife and habitat here in the U.S. and develop and adopt appropriate mitigation measures. Various potential impacts that may be associated with offshore wind construction and operations have the potential to directly, indirectly, and cumulatively impact marine species and habitats in the coastal zone and offshore environment. The likelihood, nature, and significance of potential impacts will vary based on the siting, design, construction, and operation plans of specific projects. As noted above, NEPA requires the examination of mitigation measures for identified environmental impacts and many forms of mitigation are available. BOEM should also thoroughly review and document the potential positive environmental, public health, and socioeconomic benefits of the offshore wind energy project.	The revised FEIS discusses the current condition of each resource, and potential impacts, in Chapter 3 and Appendix A and discusses potential monitoring and mitigation measures in the updated Appendix D. Additional monitoring and mitigation measures, if required, will be developed in coordination with applicable Federal, State, and local resource agencies and/or other stakeholders.
0115-004	BOEM should re-run its impacts analysis for marine mammals based on Vineyard Wind’s updated whale protection plan submitted to BOEM on January 22, 2019 and include this new analysis in the FEIS..It is imperative that all potential stressors acting on this species be minimized and mitigated to the full extent practicable in order to ensure the species continues...We strongly recommend that BOEM incorporate all the planned mitigation measures described above in Section I and included in Attachment A into the FEIS, re-running the analysis to accurately factor these actions into the agency’s assessments of potential impact levels and evaluations of mitigation measures for other protected, endangered or threatened species of marine mammals and sea turtles. As the DEIS notes [page 3-90], in addition to the North Atlantic right	Section 3.4.2 and Appendix D of the FEIS have been updated to for a discussion of monitoring and mitigation that has been proposed for the agency-preferred alternative relative to the North Atlantic right whale. Pre- and post-construction monitoring plans, if required, will be developed in coordination with the NMFS as part of the ESA Section 7 consultation. Further discussion of mitigation measures protective of listed marine mammals is provided in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ .

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	whale, NMFS has declared UMEs for humpback whales and minke whales; these species should be closely considered by BOEM, with additional mitigation measures established if needed.	
0115-005	<p>BOEM should re-run its sea turtle regional density estimates and exposure models and update the FEIS accordingly. The FEIS should include updated sea turtle density estimates and related acoustic exposure models. The most recent survey data incorporated into the DEIS sea turtle density surface models is from 2009 and does not reflect current knowledge of sea turtle occurrence in the Project Area. Re-running the density models with more recent data collected from the Project Area and immediate vicinity – the Northeast Large Pelagic Survey data conducted from October 2011 through June 2015 and additional regional data (e.g., Atlantic Marine Assessment Program for Protected Species [AMAPPS] data), as appropriate – would more accurately represent the current status quo and, in turn, provide more accurate estimates of acoustic exposures...We recommend new density surface models and accompanying abundance estimates – which are often easier for public understanding (e.g., 10 loggerhead turtles as opposed to a density of 0.1117 loggerhead turtles per 100 km²) – be generated and included alongside new acoustic exposure models in the FEIS. BOEM should also incorporate into the FEIS the more recent stranding data for 201735 and 2018, particularly as high numbers of sea turtles, mostly endangered Kemp’s ridley sea turtles, stranded in Massachusetts in the Fall of 2018. [AUTHOR: ORIGINAL FOR REFERENCES]</p> <p>...[Footnote 34] The revised model should provide a clearer indication of on-the-water reality. For example, the DEIS model sed a density estimate of zero for leatherback turtles during the summer whereas Kraus et al. 2016 recorded 98. [Footnote 36] We also recommend that relative occurrence designations not be based on abundance or number of records, as species not vulnerable to cold stunning may naturally have fewer stranding records than others.</p>	<p>Section 3.3.8.3 of the DEIS included a discussion of acoustic impacts on sea turtles. Therefore, no changes to the acoustic discussion are warranted for the FEIS. Appendix D of the FEIS includes the monitoring and mitigation relative to sea turtles that has been proposed for the agency-preferred alternative.</p> <p>The DEIS was developed with the best available science at the time of publication. Sea turtle density estimates are derived from Strategic Environmental Research and Development (SERDP) Spatial Decision Support System (SDSS) and represent the best data set to be used for animal movement modeling, as agreed to by BOEM and NMFS on July 24, 2018.</p>
0115-006	<p>The FEIS must consider the full scope of impacts to federally protected birds. BOEM must ensure that the FEIS retains consideration of the full range of potential impacts on all bird species known to forage and rest in or near the Project Area, or to migrate through the area, including those species protected under the Migratory Bird Treaty Act and the Endangered Species Act...we are aware that the Department of the Interior (DOI) and the U.S. Fish and Wildlife Service (FWS) are now relying on a new interpretation of the Migratory Bird Treaty Act that limits the scope of the Act to the purposeful take of birds.³⁸ Our organizations strongly oppose this interpretation as contrary to the plain language and intent of the law, and we urge BOEM to continue to implement its Migratory Bird Treaty Act responsibilities as all previous administrations have done in the past, with explicit recognition that incidental take is prohibited. This would also</p>	<p>A discussion of all potential impacts on Roseate Terns, Piping Plovers, and Rufa Red Knots is provided in the Biological Assessment submitted to USFWS.</p> <p>Section A.8.3 in Appendix A of the FEIS includes a discussion on listed species, and a discussions of effects for each alternative.</p> <p>Section A.8.3 of the FEIS has been updated with a discussion of the MBTA and includes discussions of measures and Standard Operating Conditions that will be used to ensure that impacts to migratory birds are minimized.</p>

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	<p>be consistent with the memorandum of understanding that BOEM signed with FWS in 2009 to protect migratory bird populations.³⁹ If DOI’s new interpretation changes BOEM’s analysis and associated requirements for impacts to migratory birds in any way, a detailed description and explanation of such changes must be included in the FEIS. We note that signatories of these comments (NRDC and Defenders of Wildlife), together with many other organizations and states, have challenged DOI’s unlawful reinterpretation of the Migratory Bird Treaty Act in court.</p>	
0115-007	<p>...the FEIS should take care to ensure that all bird species covered by the Migratory Bird Treaty Act are accounted for in the impacts assessment. All Massachusetts bird species are protected and the statement that jaegers and gulls are not species of conservation concern is incorrect.</p>	<p>Section A.8.3 in Appendix A of the FEIS includes a discussion on listed species, and a discussions of effects for each alternative.</p> <p>Section A.8.3.1 of the FEIS has been updated with a discussion of the MBTA and includes discussions of measures and Standard Operating Conditions that will be used to ensure that impacts to migratory birds are minimized.</p> <p>In Massachusetts, jaegers and gulls are not listed as Special Concern species (MNHESP 2019).</p>
0115-008	<p>The Final EIS should account for avian survey flaws and incorporate further monitoring measures. Given that existing survey efforts do not appear to have adequately captured avian use of the Project Area, BOEM should adopt a conservative approach in the Final EIS’s avian impact analysis. Modeling issues stemming from recent survey efforts must be addressed. For example, BOEM’s recent aerial surveys off the Massachusetts coastline aggregated many medium-sized tern sightings into a shared “tern species” category, which cannot be parsed out to provide detail on the number of endangered roseate terns. Further, the Marine-Life Data and Analysis Team (MDAT) predictive models, while excellent for estimating broad-scale, relative patterns of avian abundance along the Atlantic, are not suitable for estimating range and abundance for a rare and narrowly distributed species like the roseate tern. As a result, when these and other data deficiencies⁴³ are factored into BOEM’s impact model, roseate tern presence is likely to be underestimated. The core of the roseate tern’s breeding range, which overlaps the Project Area, is small⁴⁴ and so a conservative approach for this species and others that may be impacted by these surveys is required by the Final EIS.</p> <p>[Footnote 43]. The BRI spring tern surveys failed to identify any roseate terns, though of the total of 23 terns found 22% unidentified and a high proportion of unidentified terns (86%) were noted in transit surveys to and from the lease area. The unpublished nanotag study did not include MOTUS receivers within the area, potentially skewing data results.</p>	<p>Parameter used to model predicted bird occurrence used in the EIS is based on the best available science at the time of publication. The MDAT dataset (Curtice et al., 2018; Kinlan et al., 2016) was used to support a regional analysis of survey data and the MassCEC dataset (Veit et al. 2016) dataset was used to analyze local scale patterns of abundance. A framework for post-construction monitoring program for birds and bats will be developed in coordination with applicable Federal and State resource agencies. Additional mitigation or monitoring measures and/or modifications to existing mitigation and monitoring measures may be adopted in the ROD as a result of ongoing ESA Section 7 consultation with USFWS.</p>

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0115-009	...BOEM, in partnership with Vineyard Wind and in consultation with Rhode Island and Massachusetts, should undertake long-term Project monitoring before, during, and after construction for endangered species like roseate terns, red knots, and others with a suspected high collision risk, such as shearwaters and jaegers, and incorporate adaptive management measures to address impacts, as needed.	Section A.8.3 in Appendix A and Appendix D of the FEIS have been updated to include the mitigation and monitoring measures that would be implemented to avoid, minimize, and mitigate adverse impacts on birds. Pre- and post-construction monitoring plans, if required, will be developed in coordination with the USFWS during the course of ESA Section 7 consultation. No additional monitoring or mitigation measures relative to birds were included in the FEIS.
0115-010	The FEIS should include recommendations to minimize and monitor impacts of the Project on fish, invertebrate and benthic resources and Essential Fish Habitat. ...With respect to the proposed cable routes, we have a strong preference for Alternative B which would limit the offshore export cable landfall to the Covell's Beach location and enable the use of the horizontal direct drilling (HDD) technology to avoid disturbance of the nearshore and beach environment. ⁴⁵ This location and the use of HDD will result in fewer impacts and risks to winter flounder spawning areas, horseshoe crabs, and other benthic resources as compared to the Lewis Bay landfall option described in Alternative A. Horseshoe crabs are of particular concern because of their declining abundance in New England. ⁴⁶ Because horseshoe crabs use Covell's Beach as a spawning site, we believe that additional protective measures are warranted, including the use of HDD, ⁴⁷ to avoid disruption of horseshoe crab spawning activities. [FOOTNOTE 47] - It is our understanding that the Massachusetts Division of Marine Fisheries (MA DMF) has determined that the use of HDD for landfall at Covell's Beach "should avoid any disturbance to horseshoe crab spawning habitat." See the letter from MA DMF in the Massachusetts Final Environmental Impact Review, p. 199, available at https://vineyardwind.app.box.com/s/9mg2zp4nuy80cf8pd1jd1dw08ku8deh6 .	The revised COP would utilize the landfall only at Covell's Beach and would use HDD; the FEIS has been revised accordingly in Sections 2.1, 3.1, 3.2, and 3.3. In light of this, Massachusetts Division of Fish and Wildlife has declared that no time-of-year restriction is necessary to protect the horseshoe crab.
0115-011	As a general matter and to ensure minimal impact on Essential Fish Habitat species and those listed under the ESA, we recommend that BOEM and Vineyard Wind work closely with Rhode Island and Massachusetts fishery managers and NMFS to consider and implement appropriate mitigation measures to avoid, minimize, and mitigate potential adverse impacts to Essential Fish Habitat, fish and invertebrate populations which may be affected by construction activities particularly during vulnerable times of spawning, larval settlement, and juvenile development.	Section 2.2.1, Section 3.3.6.3, and Appendix D of the DEIS included a discussion of monitoring and mitigation proposed for the Project. Section 3.3.2 of the FEIS has provided additional language for monitoring. Additional monitoring requirements and mitigation measures, if any, will be developed in coordination with the NMFS and appropriate other agencies and will be included in the Record of Decision.
0115-012	Given that the offshore wind energy industry is in its infancy in the Atlantic and much will be learned during the construction and operation of this Project, a comprehensive monitoring effort is needed. BOEM, in partnership with Vineyard Wind and in consultation with Rhode Island and Massachusetts fishery managers and NMFS, should conduct long-term monitoring before, during, and after construction to document changes to the marine environment and its ecological communities in and around the Project Area as suggested above, and, if	Section 2.2.1, Section 3.3.6.3, and Appendix D of the DEIS included a discussion of monitoring and mitigation proposed for the Project. Section 3.3.2 of the FEIS has provided additional language for monitoring. Additional monitoring requirements and mitigation measures, if any, will be developed in coordination with the NMFS and appropriate other agencies and will be included in the Record of Decision.

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	necessary, design appropriate adaptive mitigation strategies to address impacts identified.	
0115-013	The FEIS should acknowledge the scientific uncertainty surrounding bat presence and potential interactions...we recommend that BOEM adopt a more conservative approach in the FEIS by exploring the incorporation of additional data into the document and by highlighting areas of scientific uncertainty. ...there is not enough data to authoritatively conclude, as the DEIS does [page 3-42] that exposure risk is low....BOEM should also factor consideration of cave-hibernating bats in its FEIS impact analysis....We further encourage the agency to discuss with FWS the potential benefit of incorporating data from the Motus Wildlife Tracking System into its analysis, which may involve additional consideration of the endangered Indiana bat in this impact analysis.	The DEIS included information on cave bats in Section 3.3.3.1 and BOEM determined that the proposed Project-related impacts had the potential to result in impacts on cave bat populations already affected by White Nose Syndrome. Furthermore, while WTGs on the OCS may not impact cave bats, onshore activities could have impacts on cave bats and this was analyzed in the DEIS. Therefore, the FEIS does not warrant any changes. More information on cave bats can be found in the Biological Assessment submitted to USFWS for listed species located at this link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ . The Biological Assessment is currently under review by the USFWS.
0115-014	Although more research is needed to characterize how bats are using offshore areas in the Atlantic, it would be reasonable to assume that bats – particularly migratory, tree-roosting species that seem to be attracted to land-based wind turbines – may experience a similar attraction to turbines offshore, which could put them at increased risk for collision. BOEM’s assessment of the impacts to bats should, therefore, be conservative. Determining whether local bat species are attracted to offshore wind turbines via robust post-construction monitoring will be critical to assessing potential impacts and whether adaptive management measures should be considered, as needed. The FEIS should also note the scientific uncertainty surrounding the degree to which bat mortality may increase with tower height and should adjust the language regarding bat impacts in Alternative E accordingly. [AUTHOR: ORIGINAL FOR REFERENCES]	Section A.8.4.4 in Appendix A of the FEIS has been updated to include additional information on bats and height of structures, specifically the increase in mortality rates associated with increased turbine height documented at some land-based WTG.
0115-015	The FEIS should provide the aggregate impact of each stress category for each biological resource category. For example, in estimating the aggregate impact of the stressor that is noise on the biological resource category of marine mammals, one would aggregate the impacts from the noise from pile driving plus vessel noise plus operational noise, etc. Instead the DEIS separates out noise exposure categories, having pile driving resulting in a minor to moderate risk, ⁵⁷ potential behavior impacts from vessel sound as minor to moderate, ⁵⁸ etc.; there is no summary of impacts from the serious stressor that is noise. Without estimating the overall impact of stressors like noise to each biological resource category like marine mammals, it clouds the full extent of a potential impact or stressor, whether and when recovery may occur, and what mitigation measures are appropriate. BOEM must ensure NEPA review fully calculates biological impacts, and this would help provide the accurate assessment necessary to identify and mitigate impacts and allow firm footing for the Project and industry to thrive.	The biological resources sections of the FEIS have been updated to address this and similar comments, specifically related to pile driving impacts as well as noise generated by Project vessels and operational WTGs. BOEM has coordinated with NMFS in the development of the Biological Assessment relative to marine mammals and the potential adverse effects relating to noise for the proposed Project, taking into consideration their feedback and, in some cases, their direct edits to the FEIS.

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0115-016	<p>The FEIS should better account for ecosystem uncertainty... BOEM should adopt a precautionary approach to account for fundamental gaps in our understanding of species and their behavioral responses and employ the best available scientific methods to monitor and, if necessary, design adaptive mitigation strategies. BOEM provides commentary on “incomplete or unavailable information”; however, this assessment does not appear to be carried forward for complete consideration in all parts of the impacts analysis and the agency should adopt a more open approach to the appraisal of data gaps and uncertainties in the FEIS.</p>	<p>Appendix D of the FEIS has updated the comprehensive list of the monitoring and mitigation that has been considered and evaluated in the updated assessment in the document. As explained in the updated Appendix D of the FEIS, Vineyard Wind has committed to monitoring efforts for a number of resources. According to the Council on Environmental Quality (CEQ), monitoring is “fundamental for ensuring the implementation and effectiveness of mitigation commitments, meeting legal and permitting requirements, and identifying trends and possible means for improvement” (Council on Environmental Quality 2011). Because monitoring efforts proposed are specifically intended to perform these functions described by CEQ – to identify trends and possible means for improvements through refinement - they are a critical element of mitigation, and also identified in Table D-1, Appendix D of the FEIS. Monitoring programs would be developed in coordination between BOEM and agencies with jurisdiction over the resource to be monitored. Appendix H of the FEIS includes a discussion on Incomplete or Unavailable Information for each resource.</p>
0115-017	<p>As a result, in addition to the consideration of potential individual and aggregate impacts from the Project, BOEM must also analyze the cumulative impacts of reasonably foreseeable offshore wind development projects on habitat as well as the physiology, behavior, and overall health of marine life cumulatively for the U.S. East Coast.</p> <p>In conducting this analysis, BOEM should define cumulative impacts to encompass: (i) repeated disturbance from the same activity over time and space; (ii) the interactions between different types of potential impacts; (iii) multiple wind energy development projects; and, (iv) the broader context of other ocean uses both within the leasing area and that may be encountered by transboundary and migratory species during their life cycle. The potential impacts of offshore wind development will occur in an already-compromised acoustic and otherwise affected environment. In this context, BOEM must consider the impacts of other activities and events as part of its environmental analysis, including, but not limited to, vessel collisions, bycatch and entanglement, and the potential for large-scale seismic exploration and offshore oil and gas drilling. BOEM must not only consider past and present federal and non-federal actions, but also reasonably foreseeable future federal and non-federal actions.</p>	<p>BOEM prepared a SEIS that included an expanded planned action analysis, which described the methodology in Chapter 1 and the list of projects considered in Appendix A of the SEIS. Potential impacts are considered as described in Appendix A and in individual resource sections. BOEM has revised the list of reasonably foreseeable future offshore wind projects based on project progress since publication of the DEIS. Each resource section addresses, in the DEIS, SEIS, and FEIS, potential environmental impacts of reasonably foreseeable future projects identified in Appendix A. The effects assessments in each resource-specific section have been updated based on recent project updates as well as new information received between preparation of the DEIS and FEIS. Appendix H of the FEIS includes a discussion on Incomplete or Unavailable Information for each resource.</p>
0115-018	<p>The FEIS should fully consider the cumulative impact of oil and gas development and other stressors on right whales...in its analysis of stressors potentially affecting North Atlantic right whales, it is imperative that BOEM afford more detailed consideration of seismic surveys for oil and gas development in the Mid- and South Atlantic in the FEIS. While it is true that the issuance of permits for these activities by BOEM is still pending at the time of this letter, five incidental harassment authorizations have already been issued by</p>	<p>The five IHAs issued in November 2018 for incidental harassment of marine mammals have been added to the scenario as described in Appendix A of the FEIS. Section 3.4 and Appendix A of the FEIS have revised the discussion of Geological and Geophysical surveys associated with oil and gas development that may contribute to impacts on marine mammals.</p>

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	NMFS under the Marine Mammal Protection Act and therefore this action should be considered “reasonably foreseeable” by BOEM	
0115-019	The FEIS should fully consider the cumulative impact of oil and gas development and other stressors on right whales. BOEM must recognize...that [seismic surveys for oil and gas development] would result in a serious additional and long-term stressor for North Atlantic right whales throughout much of their range and would interact cumulatively with other stressors, including those potentially arising from offshore wind development...BOEM should clearly acknowledge the serious risks posed to North Atlantic right whales by seismic surveys, including the expectation that those risks would result in a “major” cumulative impact level when combined with other existing and potential stressors. In addition, BOEM should carefully consider the cumulative impacts of vessel noise, as vessel traffic has already been demonstrated to have drastically reduced communication of North Atlantic right whales in the Northeast.	Section 3.4 and Appendix A of the FEIS have revised the discussion of Geological and Geophysical surveys associated with oil and gas development that may contribute to impacts on marine mammals.
0115-020	BOEM should include active offshore wind lease areas in its analysis of cumulative impacts. The FEIS for the Project – and each offshore wind EIS that follows – should address the cumulative impact of a build-out of East Coast offshore wind power [including] South Fork Wind Farm (90 MW for New York), Revolution Wind (400 MW for Rhode Island, 300 MW for Connecticut), U.S. Wind’s Maryland project (248 MW for Maryland), Skipjack Wind Farm (120 MW for Maryland), and Dominion’s Coastal Virginia Offshore Wind Project (12 MW for Virginia), which have all received offtake commitments at this time. As a result, it is within BOEM’s purview, in collaboration with state-coordinated efforts (e.g., the NYSERDA Environmental Technical Working Group), as appropriate, to ensure potential cumulative impacts occurring across different lease areas are analyzed and used to inform mitigation and monitoring efforts.	BOEM has revised the list of reasonably foreseeable future offshore wind projects based on project progress since publication of the DEIS, and this information was included in the SEIS and carried forward to the FEIS. The list of reasonably foreseeable future offshore wind projects is included in Appendix A of the FEIS.
0115-021	We question, however, BOEM’s decision to only consider wind energy projects falling within Tiers 1, 2, and 3 as “reasonably foreseeable” and to only analyze the cumulative impacts of development activities in these lease areas. In our view, at minimum, site assessment and characterization activities in all lease areas are “reasonably foreseeable” within the timeframe that the Project will be operational, and have the potential to contribute cumulative impacts. We therefore recommend that BOEM also consider the cumulative impacts of site assessment and characterization activities for lease areas classified as Tier 4 or 5.	BOEM has revised the list of reasonably foreseeable future offshore wind projects based on project progress since publication of the DEIS, and this information was included in the SEIS and carried forward to the FEIS. The list of reasonably foreseeable future offshore wind projects is included in Appendix A of the FEIS. Site assessment activities are considered reasonably foreseeable for all leased areas.
0115-022	The FEIS should fully analyze the Project’s environmental, climate, public health, and socioeconomic benefits. The DEIS touches briefly on the Project’s benefits in various sections. However, the Project’s environmental, public health, and jobs benefits are more extensive than those described. As noted above, the	Information based on public and stakeholder comments has also been added to Section 2.4 of the FEIS summarizing the potential benefits of the project.

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	<p>Project will have an array of positive environmental, public health, and climate benefits... Benefits to climate and public health from an increase in offshore wind projects vary across different scenarios, and the quantity of benefits or drawbacks are often site-specific. Factors including local electrical grid infrastructure, local constraints, and market conditions contribute to variability of these benefits. Offshore wind projects also produce environmental benefits because unlike fossil fuel generation or nuclear facilities, offshore wind power does not rely on large sources of freshwater or seawater for cooling, nor do offshore wind facilities produce the same solid or liquid wastes that are associated with conventional sources of power. Further, offshore wind facilities do not produce the fly ash or bottom ash waste that result from coal-fired plants or spent fuel rods that result from nuclear plants. The Project will also create both construction and long-term operations and maintenance jobs. For all these reasons, BOEM should more thoroughly document and describe the Project's environmental, public health, and climate benefits in the FEIS, including the cumulative benefits of the Project.</p>	
0115-023	<p>Similarly, the FEIS should expand upon and provide greater detail on the negative environmental and public health impacts of Alternative F (the No Action alternative under which the project is not built).</p>	<p>Alternative F has been fully evaluated in the DEIS and subsequently the FEIS. Chapter 3 and Appendix A of the FEIS provides more information on each resource area.</p>
0115-024	<p>Overall, in this specific case, we think the way that the PProject DEIS incorporates the project envelope approach is appropriate... We caution that should Alternatives D1 or D2 be selected that care be taken to ensure that impacts resulting from eventual construction and operations would fall within the maximum design scenario identified in this DEIS. Currently, the DEIS notes that should Alternatives D1 or D2 be selected, additional survey work is necessary. If survey work entails impacts that extend beyond the full spectrum of this DEIS's maximum design assumptions, then a supplemental environmental review could be necessary, which would negate the efficiency benefits of the PDE process.</p>	<p>Thank you for your comment.</p>
0115-025	<p>It is imperative that all potential stressors acting on [the North Atlantic right whale] this species be minimized and mitigated to the full extent practicable in order to ensure the species continues...We strongly recommend that BOEM incorporate all the planned mitigation measures described above in Section I and included in Attachment A into the FEIS, re-running the analysis to accurately factor these actions into the agency's assessments of potential impact levels and evaluations of mitigation measures for other protected, endangered or threatened species of marine mammals and sea turtles. As the DEIS notes,²⁹ in addition to the North Atlantic right whale, NMFS has declared UMEs for humpback whales and minke whales;³⁰ these species should be closely considered by BOEM, with additional mitigation measures established if needed.</p>	<p>Section 3.4.2 and Appendix D of the FEIS have been updated to include a discussion of monitoring and mitigation that has been proposed for the agency-preferred alternative relative to the North Atlantic right whale. Pre- and post-construction monitoring plans, if required, will be developed in coordination with the NMFS as part of the ESA Section 7 consultation.</p>

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0115-026	BOEM must ensure that the FEIS retains consideration of the full range of potential impacts on all bird species known to forage and rest in or near the Project Area, or to migrate through the area, including those species protected under the Migratory Bird Treaty Act and the Endangered Species Act.	<p>An updated discussion of collision (Section 4.2.1.6) and displacement (Section 4.2.2) impacts on Rufa Red Knots, Piping Plovers, and Roseate Terns is discussed in the Biological Assessment submitted to USFWS, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/.</p> <p>Section 3.3.2 of the FEIS includes a discussion on impacts on fish species; Section A.8.3 in Appendix A of the FEIS includes a discussion on listed species, and a discussions of effects for each alternative.</p>
0115-027	As little data exists on bat species' use of the offshore environment and the potential for interactions with offshore wind turbines, we recommend that BOEM adopt a more conservative approach in the FEIS by exploring the incorporation of additional data into the document and by highlighting areas of scientific uncertainty. While studies to date reveal bat activity appears to decline with increased distance from shore, there is not enough data to authoritatively conclude, as the DEIS does, ⁵⁰ that exposure risk is low. In offshore bat surveys of the Atlantic, migratory tree-bats were widespread, with, for example, eastern red bats detected at 97% of all surveyed sites, including the most remote site. ⁵¹ BOEM should also factor consideration of cave-hibernating bats in its FEIS impact analysis. Recent survey data of bats offshore the United States found clear evidence of cave-hibernating bats, including Myotis species like the threatened northern long-eared bat and little brown bats, offshore. ⁵² We further encourage the agency to discuss with FWS the potential benefit of incorporating data from the Motus Wildlife Tracking System into its analysis, which may involve additional consideration of the endangered Indiana bat in this impact analysis. ⁵³	Section A.8.4 of the FEIS has been revised to provide additional information. The FEIS uses the best available information, and thus complies with the procedural requirements of NEPA.
0115-028	... in addition to the consideration of potential individual and aggregate impacts from the Project, BOEM must also analyze the cumulative impacts of reasonably foreseeable offshore wind development projects on habitat as well as the physiology, behavior, and overall health of marine life cumulatively for the U.S. East Coast. In conducting this analysis, BOEM should define cumulative impacts to encompass: (i) repeated disturbance from the same activity over time and space; (ii) the interactions between different types of potential impacts; (iii) multiple wind energy development projects; and, (iv) the broader context of other ocean uses both within the leasing area and that may be encountered by transboundary and migratory species during their life cycle. The potential impacts of offshore wind development will occur in an already-compromised acoustic and otherwise affected environment. In this context, BOEM must consider the impacts of other activities and events as part of its environmental analysis, including, but not limited to, vessel collisions, bycatch and entanglement, and the potential for large-scale seismic exploration and offshore oil and gas drilling.	Appendix A of the FEIS has been updated to provide additional discussion of impacts.

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	BOEM must not only consider past and present federal and non-federal actions, but also reasonably foreseeable future federal and non-federal actions.	
0115-029	The COP must provide enough specifics on each possible configuration covered by the proposed envelope to evaluate impacts on affected species and to fully evaluate the proposal.	Thank you for your comment.
0115-030	Additionally, to encompass the full range of reasonably foreseeable impacts, BOEM’s analysis must include an alternative that combines the most disruptive components for each option included in the envelope.	The development of the EIS has been based on Vineyard Wind’s utilization of the PDE, which is detailed in Appendix G. The FEIS assesses the impacts of the reasonable range of Project designs that are described in the Vineyard Wind COP and presented in Appendix G by using the “maximum-case scenario” process. Chapter 3 and Appendix A of the FEIS assesses the maximum-case scenario.
0115-031	As a general matter with respect to all offshore wind projects going forward, we strongly advise BOEM to ensure all project details relevant for assessing potential impacts are provided and reviewed so that a solid, legally defensible Record of Determination may be issued.	Thank you for your comment.
0115-032	it is essential that BOEM conduct a technical, quantitative analysis of the cumulative impacts of offshore wind development, against a baseline of other reasonably foreseeable actions, on the North Atlantic right whale. This analysis should then be incorporated into the agency’s NEPA compliance documents. We recommend that the analysis quantify the percentage of the North Atlantic right whale population potentially exposed to conceivable impacts from offshore wind development on an annual basis ⁸⁵ and, as a worse-case scenario, the potential impact on population viability of a long-term or permanent loss of foraging and other habitat within all lease areas expected to be developed. The analysis should also examine the additional energetic expenditure experienced if right whales were to avoid all lease areas expected to be developed during their migration.	Section 3.4.2 of the FEIS has been revised in coordination with NMFS. The revised Section 3.4.2 of the FEIS includes a discussion of impacts on North Atlantic right whales. Section 3.4 of the FEIS has revised the discussion of impacts on North Atlantic right whales. Further discussion of impacts on North Atlantic right whale is provided in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ . The FEIS incorporates by reference the technical quantitative analysis of the North Atlantic right whale presented in the Biological Assessment submitted to NOAA and the Incidental Harassment Authorization submitted in relation to this proposed Project.
0115-033	Habitat avoidance may also result in right whales being displaced into shipping lanes, thereby increasing the risk of ship strikes, one of the leading causes of North Atlantic right whale mortality. ⁸⁶ The analysis should estimate the additional potential risk that displacement into shipping lanes, and the increased vessel traffic resulting from wind development itself, may pose along the East Coast and evaluate that risk against that of jeopardy to the species’ survival and recovery as required by the ESA and, more broadly, all impacts short of jeopardy as required by NEPA. Such an analysis will allow BOEM to determine if existing mitigation measures are adequate or if potential impacts need to be managed as projects are developed concurrently and sequentially. For example, considering vessel collision risk for the entire East Coast may illuminate that more comprehensive vessel speed mitigation measures need to be in place at the project level in order to reduce the overall cumulative risk.	Section 3.4.2 of the FEIS has revised the discussion of vessel strike impacts on marine mammals. Section 3.4.2 and Appendix D of the FEIS have been updated to include a discussion of monitoring and mitigation that has been proposed for the agency-preferred alternative. Further details regarding vessel strikes are provided in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ . The Biological Assessment predicts that NARW could be displaced from their usual habitat by noise for no more than 6 hours per day during monopile installation and up to 14 hours per day during jacket installation; according to Pýc et al. 2018 (COP Volume III Appendix M; Epsilon 2020a), the maximum radial distance that whales would be displaced would be approximately 2.2 nautical miles (4 kilometers). The shipping lanes lie greater than 21.6 nautical miles (40 kilometers) away from the closest potential location

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		for pile driving; therefore, the risk that whales would be displaced into shipping lanes is minimal. All Project-specific Avoidance, Minimization, and Mitigation measures relative to the NARW are being developed in coordination with the NMFS as part of the ESA Section 7 consultation. Per the Vineyard Wind -NGO agreement: A mandatory speed restriction of 10 knots shall be observed within Dynamic Management Areas (“DMAs”) established by National Oceanic and Atmospheric Administration (“NOAA”) Fisheries, with the exception of crew transfer vessels. A mandatory speed restriction of 10 knots shall be observed within DMAs by crew transfer vessels, unless under approved conditions.
0115-034	BOEM should conservatively assess the potential loss to the right whale of communication and hearing range ⁸⁷ and assume that any substantial decrement will result in adverse impacts on the species’ foraging, mating, or other vital behavior. A conservative approach is justified given the species’ extreme vulnerability, where any additional stressor may potentially result in population-level impacts, and the difficulty in obtaining empirical data on population-level impacts on wild animals.	Section 3.4.2 of the FEIS has revised the discussion of acoustic impacts on marine mammals. Further details regarding acoustic effects to these species are provided in Appendix F of the FEIS and in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ . All Project-specific Avoidance, Minimization, and Mitigation measures relative to the NARW are being developed in coordination with the NMFS as part of the ESA Section 7 consultation.
0115-035	...to best account for the impacts of the simultaneous development of multiple lease areas on North Atlantic right whales, we further recommend that the agency take steps to prepare a Programmatic Environmental Impact Statement encompassing all U.S. East Coast offshore wind development as soon as possible to help inform future offshore wind leasing and permitting reviews. Such an approach will ensure that alternatives and mitigation measures are considered at the scale at which impacts would occur.	BOEM believes that the information available is adequate for analyzing potential impacts on NARW from the proposed Project.
0115-036	...BOEM should ensure the necessary research and monitoring is carried out to address offshore wind/wildlife uncertainties in the offshore environment regarding... mitigation options may be needed to ensure species’ protection and provide the certainty that will allow for further ramp-up of the industry. Improved and sustained data compilation would also advance understanding of species’ occurrence in the Project Area and region. As the U.S. offshore wind industry moves forward, we recommend BOEM support the collection and analysis of comprehensive baseline data and undertake a regional approach to ongoing data collection in collaboration with developers, scientists, resource managers, and other stakeholders.	Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. Additional mitigation and monitoring measures may arise from consultations and coordination with Federal and State resource agencies. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0115-037	BOEM should also take immediate measures to address uncertainty related to the influence of climate change on coastal and marine species and habitats (e.g., range shifts). While global climate change is acknowledged as a potential cumulative impact in the DEIS, ⁸⁸ this is not enough. BOEM should act expeditiously to obtain additional empirical data on current shifts in species and	The FEIS considers the benefits that could result from the project in the context of climate change. See Chapter 2 and Section A.8.1 in Appendix A of the FEIS.

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	habitat distributions and work to improve its predictive modeling of future species distributions. This information should then be factored into BOEM's review of offshore wind development activities in order to account for uncertainty related to climate-induced dynamic shifts in species distribution (e.g., marine mammals, birds, forage fish, and sharks). ⁸⁹	
0115-038	BOEM also retains the ability to adopt supplemental mitigation measures should monitoring or the agency's data collection efforts identify an unexpected negative impact. While it would be inappropriate for BOEM to rely on an adaptive management plan to address the environmental considerations highlighted in a DEIS in lieu of specifying necessary mitigation measures, the agency is allowed and encouraged to adopt further adaptive management measures if needed.	Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. Additional mitigation and monitoring measures may arise from consultations and coordination with Federal and State resource agencies. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0115-039	...in determining the potential impact of noise from geophysical surveys, and construction and operations activities, BOEM should request from NMFS new guidelines on thresholds for marine mammal behavioral disturbance that are sufficiently protective and consistent with the best available science. Multiple marine species have been observed to exhibit strong, and in some cases lethal, behavioral reactions to sound levels well below the 160 dB threshold defined by NMFS for Level B take, leading to calls from the scientific community for the agency to revise its guidelines. ⁹⁰ Acceptance of a 160 dB threshold for Level B take will result in BOEM's significant underestimation of the impacts to marine mammals and potentially the permitting, recommendation, or prescription of ineffective mitigation measures (e.g., under-protective exclusion zones).	Section 3.4.2 of the FEIS has been revised in coordination with NMFS and includes the proposed mitigation and monitoring measures for marine mammals. Furthermore, Section 3.4 and Appendix D of the FEIS include the draft Incidental Harassment Authorization measures proposed to be issued under the MMPA.
0115-040	...fundamental gaps remain in our knowledge of the sensory (e.g., hearing and navigation) ecology of sea turtles. ⁹¹ It has been determined that sea turtle hearing sensitivity overlaps with the frequencies and source levels produced by many anthropogenic sources; however, more research is needed to determine the potential physiological and behavioral impacts of these noise sources on sea turtles.... As the offshore wind industry advances, studies are needed to determine critical ratios and temporary and permanent threshold shifts so that accurate acoustic threshold limits for anthropogenic sound sources can be added to NMFS's sound exposure guidelines for protected species like sea turtles, and additional monitoring and mitigation protocols can be developed to minimize impacts to sea turtles during offshore wind development and operation and other anthropogenic activities. Experiments are also needed to: (i) spatially separate acoustic pressure and intensity to determine which component(s) of sound sea turtles detect to determine if hearing sensitivity changes under pressure; ⁹⁵ and (ii) conduct underwater audiograms of sea turtle species of all age classes, as hearing sensitivity is known to change with age. ⁹⁶ Given this, not only should monitoring of sea turtle sensory ecology be conducted, but a conservative	BOEM believes that the information available is adequate for analyzing potential impacts on sea turtles from the proposed Project.

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	approach should be adopted in EISs to guard against impacts to these threatened and endangered species.	
0115-041	BOEM should require offshore wind developers to commit to carry out scientific research and long-term monitoring to advance understanding of the effects of offshore wind development on marine and coastal resources and ocean uses and the effectiveness of mitigation technologies (e.g., noise attenuation, thermal detection) over the life of the Project. Science should be conducted in a collaborative and transparent manner, utilizing recognized marine experts, engaging relevant stakeholders, and making results publicly available and shared, as appropriate, on the Northeast and Mid-Atlantic Ocean Data Portals. Developers should coordinate with state and regional scientific efforts ⁹⁷ to ensure results from individual lease areas can be interpreted within a regional context and contribute to the generation of regional-scale data, which is required to address questions related to population-level change and cumulative impacts across the geographic range of the North Atlantic right whale and other affected species.	Appendix D of the FEIS has updated the comprehensive list of monitoring and mitigation, including the commitment to contribute funds to regional monitoring programs that has been proposed for the agency-preferred alternative.
0115-042	Developing and testing vessel design solutions that could reduce risk of collision, collision-related mortality, serious injury, and other impacts for North Atlantic right whales and other large whales and sea turtles as well as disturbance from noise (e.g., enclosed propellers, modified hull design) should also be a priority for BOEM. Ship strikes are a serious concern for marine mammals and sea turtles and it is of vital importance that solutions be developed and their efficiency be independently and scientifically tested. For the solutions aimed specifically at reducing the incidence and severity of vessel collision, such tests must be conducted in a manner that enables direct comparison with the efficacy of vessel speed restrictions in reducing the risk of collisions. ‘	Section 3.4.2 of the FEIS has been revised in coordination with NMFS and includes the proposed mitigation and monitoring measures for marine mammals. Furthermore, Section 3.4 and Appendix D of the FEIS include the draft Incidental Harassment Authorization measures proposed to be issued under the MMPA.
0116-001	... request BOEM to reopen the public comment period....following the public meetings in Massachusetts and Rhode Island that were canceled due to the government shutdown....and to schedule a public hearing regarding the VW DEIS in New York, specifically on the eastern end of Long Island, either in Montauk or Shinnecock... New York’s fishing communities should not be left out of the public meeting process. Without a dedicated Long Island meeting, those from New York who wish to attend to give input at a soon-to-be-rescheduled BOEM public meeting will suffer undue hardship of excessive travel and cost to travel to RI and/or Ma for a public hearing.	The public comment period for the DEIS for the Vineyard Wind Project was extended until February 22, 2019 due to the government shutdown. Furthermore, BOEM rescheduled the five public meetings and they were held on February 11, 12, 13, 14 and 15, 2019. Appendix C (formerly Chapter 4) of the FEIS was updated with this information as well as information related to the virtual public meetings held during the SEIS public comment period.
0116-002	New York’s commercial fishermen have been left out of the BOEM MA process...New York State’s Department of State at no time was invited to any of the BOEM MA task force meetings, as they should have been, to request federal consistency review of the MA WEAs, as Rhode Island has.... even though New	Section 1.1 of the DEIS contained information on the background of the process and project. Appendix C (formerly Chapter 4) of the FEIS has been updated with information on the coordination and consultation process to date for the proposed Project.

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	York commercial fishermen have fished in the area of the Vineyard Wind lease area for decades	
0116-003	New York has several fisheries regulated by the NEFMC or jointly with the Mid-Atlantic Fishery Management Council (MAFMC) and since the 1980s has ranked in the top three states landings for squid, whiting, ling, butterfish and scup, all fisheries that take place within the Vineyard Wind WEA.	This has been acknowledged in Section 3.10.1 of the FEIS.
0116-004	BOEM should no longer ignore the errors made during the BOEM MA task force process in 2010-12 and instead make an attempt to right the errors before this DEIS goes any further.	Thank you for your comment.
0116-005	The squid fishery that exists within the Vineyard Wind WEA, with a 20-year lease, is a short-term use of the environment compared to the harvesting of millions of pounds in squid from the area for over 40 years by New York’s fishermen. In fact, in some years, 90 percent of their June through September summer season has been spent in the Vineyard Wind WEA catching squid.	Section 3.10.1, Figure 3.10-2 of the FEIS acknowledges that squid is an important fishery in the WDA, with squid fishing vessel density in the WDA characterized as medium high to high. However, as specified in the FEIS, less than 2 percent of the total coast-wide value for Mackerel, Squid, and Butterfish FMP is from the WDA. In addition, Section 3.10.2 of the FEIS states that “In a given year, it is possible that the center of the resource’s exploitable biomass would be found within the WDA during operations and maintenance. If that were to occur, some fisheries—like the squid trawl fishery—may not be able to safely operate and harvest the resource in the WDA using status-quo fishing techniques. In this situation, a large portion of annual income for vessels may be inaccessible during operations, resulting in major impacts on individual vessel owners for a given year that could have longer-term impacts due to low operating capital.” However, mitigation measures identified in Appendix D and the use of compensation payments to affected fishermen would, if consummated, reduce impacts.
0116-006	There is nothing that will have a greater detrimental effect on the long-term productivity of the area south of Nantucket, within the VW WEA, then creating an offshore wind energy site there, destroying the ocean via pile driving, jet plowing and criss-crossing the ocean floor with miles of EMF-laden transmission cables in a dynamic tide environment in an area that not only harvests millions of pounds of seafood for humans each year, but feeds the entire ecosystem each summer, whales, birds, turtles, and man. It will be an environmental crisis of epic proportions, one that can be avoided.	Thank you for your comment.
0117-001	APCC believes Vineyard Wind has largely addressed the major issue areas associated with the project through proposed actions that would avoid, minimize or mitigate most of the potential environmental impacts in the offshore and onshore aspects of the project.	Thank you for your comment.
0117-002	...APCC is also keenly aware that impacts to the environment and to humans will be catastrophically more significant if nothing is done to address climate change, and if projects such as Vineyard Wind do not move forward. As the first major	Thank you for your comment.

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	offshore wind project in the United States, Vineyard Wind will be a significant step forward in the effort to shift our reliance from greenhouse gas-causing fossil fuels to clean renewable energy sources.	
0117-003	APCC supports the package of mitigation proposed by Vineyard Wind to protect marine mammals...in addition to Vineyard Wind’s mitigation proposals, APCC recommends that BOEM require the implementation of other mitigation measures described in Appendix D of the DEIS, including long-term passive acoustic monitoring, daily pre-construction passive acoustic monitoring and visual surveys, and the prohibition of pile driving from sunset to sunrise during construction. Protection of marine mammals must be a fundamental component of this project, and APCC calls on BOEM, the National Marine Fisheries Service and Vineyard Wind to continue to seek additional mitigation strategies to further reduce the potential for adverse impacts, especially potential impacts to North Atlantic right whales.	Section 3.4.2 of the FEIS has been revised in coordination with NMFS and includes the proposed mitigation and monitoring measures for marine mammals. Furthermore, Section 3.4 and Appendix D of the FEIS include the draft Incidental Harassment Authorization measures proposed to be issued under the MMPA.
0117-004	APCC recommends that BOEM require additional mitigation measures it has considered in its analysis that would further reduce potential for impacts to avian species during construction as well as during ongoing operation phases of the project, particularly mitigation that could help reduce the potential for fatalities of federally listed bird species... In its written comments on the project’s Supplemental Draft Environmental Impact Report (SDEIR), NHESP noted Vineyard Wind’s comprehensive mitigation strategy to protect marine mammals and recommended that a similar approach be implemented for listed avian species. APCC supports NHESP’s recommendation and looks to further coordination between Vineyard Wind and NHESP, along with BOEM’s input, to develop a strategy to maximize protection of listed avian species.	A framework for post-construction monitoring program for birds and bats will be developed in coordination with applicable Federal and State resource agencies. Additional monitoring or mitigation measures relative to birds were included in the FEIS. Section A.8.3.2 and Appendix D of the FEIS include updated mitigation and monitoring measures that would be implemented to avoid, minimize, and mitigate adverse impacts on birds.
0117-005	APCC applauds the efforts of Vineyard Wind and the town of Barnstable to develop a Host Community Agreement that facilitates the use of Covell’s Beach as the cable landing site, enables onshore underground cable routing to be located entirely within existing roadway layouts, and establishes coordination between Vineyard Wind and the town on protecting groundwater at the substation site through a spill containment system, stormwater management plan and other mitigation.	Thank you for your comment.
0117-006	APCC strongly encourages the project applicant to continue to pursue the possibility of using biodegradable dielectric fluids for the substation’s main transformers, as described in the FEIR...Ensuring that water supplies are protected from hazardous material spills is of paramount importance, and APCC therefore recommends that DRI approval be conditioned on the Commission’s and the town of Barnstable’s review and approval of a completed plan.	Section 3.2.2.3 of the DEIS (A.8.2 in the FEIS) includes a discussion of the proposed substation and the proposed impervious containment sumps for dielectric fluids, as well as, additional substation components and measures to minimize or avoid potential impacts on water quality in the event of a potential spill. Therefore, no change to the FEIS is warranted.

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0118-001	[The Madeket Residents Association members are] concerned about the potential for visual blight, particularly at night if there are red lights at the top of each turbine that will blink every two seconds. We would very much appreciate it if BOEM were to require the installation of an Aircraft Detection Lighting System (ADLS).	Section 3.9.2 of the FEIS has been updated to include revised discussion of the importance of nighttime sky and the potential implementation of ADLS.
0119-001	I support Vineyard Wind for the economic benefits, environmental responsibility and community benefits that have all been carefully built into the project. Please permit this project as defined by Vineyard Wind, LLC. Americans continue to consume more power every year, and this is a model project for meeting energy demands sustainably.	Thank you for your comment.
0120-001	The Vineyard Wind proposal for offshore wind turbines is part of a major, and entirely necessary, scaling up of renewable energy in the Northeast United States...The proposed turbines will produce electricity for tens of thousands of homes in the ISO-New England electrical grid service area. It will allow us to turn off natural gas and oil burning plants, and with the other proposed sitings of offshore wind, will steeply reduce our impact on the global climate system.	Thank you for your comment.
0120-002	It is unfortunate that siting did not incorporate the concerns of fishers, including their customary East-West trawling routes. To delay the project to remap and relocate and re-approve these concerns now will delay the project, and potentially lead to its cancellation. Significant compensation, technical support, and retraining of fishers affected is appropriate.	Section 3.10 of the FEIS has been revised to provide additional information related to the use of the Project area by vessels and project layout. Section 2.5 of the FEIS has been included to identify the agency-preferred alternative.
0123-001	I write to you in strong support of Vineyard Wind LLC offshore wind project. Having been born and raised on Nantucket and being a small business owner I have seen the effects of climate change taking place on Nantucket... This project has the ability to galvanize support for offshore wind and move us a big step forward in addressing climate change by producing energy locally.	Thank you for your comment.
0123-002	I feel that Vineyard Wind has done an excellent job in addressing fisheries, whale, bird and human concerns.	Thank you for your comment.
0124-001	I am writing to express strong and unequivocal support for the Vineyard Wind proposed offshore wind energy project... we need to do as much as we can to mitigate the effects of climate change by transitioning to clean, renewable energy.	Thank you for your comment.
0124-002	I care about the environmental impact of a project like this, but given that similar projects have been so successful in Europe, I do not see reason for concern.	Thank you for your comment.
0125-001	This project is important not only because it would be the first commercial-scale offshore wind project in the country but because it represents a major step forward in tackling climate change, including meeting Massachusetts goals for emissions reductions.	Thank you for your comment.
0125-002	I support this project because Massachusetts sorely needs energy diversity and offshore wind is the only renewable energy technology that can sustainably	Thank you for your comment.

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	deliver at scale and replace the coal-fired power and nuclear power stations that have closed down or will close down. Rather than building new natural gas pipelines or biomass power stations, Massachusetts should be doing everything it can to support offshore wind, solar, onshore wind, energy efficiency and other sustainable approaches to reduce emissions, save money, and grow our economy.	
0125-003	The project will also bring substantial economic benefits to Massachusetts, including more than 3,000 jobs.	Thank you for your comment.
0126-001	I am writing to express my enthusiastic support for this offshore wind project. Moving this project forward is critical for the protection of Rhode Island coastlines, fisheries (due to climate change’s impact on ocean acidification, sea level rise, fish migratory patterns, and more), air quality, and all of the other countless impacts that climate change has.	Thank you for your comment.
0126-002	In addition, Vineyard Wind has worked tirelessly to make sure the project will protect local ecosystems. In fact, Vineyard Wind has proposed a \$30 million comprehensive funding package for the RI Fishing Industry that is based on a study conducted by Dennis M. King, Ph.D., a leading expert in this field... This project has taken the utmost care to protect fisheries and locals who rely on fisheries for the income in the near and long term.	Thank you for your comment.
0128-001	This project is a step towards helping to reduce our dependence on fossil fuels...The research found that the negative impacts of the project would be minor to negligible...Along with taking steps toward helping to fight Climate Change there will be financial benefits for the local community ... Please consider moving forward with this project.	Thank you for your comment.
0129-001	It’s important to enable wind energy projects like this one, as soon as possible, to help meet the reduction in CO2 than needs to happen to prevent the worst impacts from climate change. Cape Cod will be hit very hard by climate change, and we have an opportunity to lead the nation by moving forward with this great new source of clean energy.	Thank you for your comment.
0130-001	I speak in favor of the Vineyard Wind project and offshore wind in general...I believe that wind-generated electricity is an important resource for New England. Shallow-water and close-to-shore projects such as Vineyard wind are an important demonstration of this energy source.	Thank you for your comment.
0131-001	[Clean Water Action] supports the Vineyard Wind project for several reasons. First, the project will deliver 800 MW of emission-free electricity generation to Massachusetts from the nation’s first large-scale offshore wind farm.	Thank you for your comment.
0131-002	Second, Vineyard Wind will reduce Massachusetts’ reliance on natural gas and lower ratepayers’ electricity bills.	Thank you for your comment.

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0131-003	Third, Vineyard Wind has worked closely with local communities in developing its project and has made improvements to it based on community and other stakeholder input.	Thank you for your comment.
0131-005	...the project more than addresses the limited community concerns about noise and light pollution.	Thank you for your comment.
0131-006	Vineyard Wind is committed to responsible renewable energy project development as evidenced by the recently announced agreement with environmental organizations to protect the critically-endangered North Atlantic right whale (NARW). This historic agreement sets a strong standard of protection for this species and will help Massachusetts achieve its climate change and renewable energy goals without further endangering the NARW.	Thank you for your comment.
0132-001	This area is frequented by many highly migratory pelagic fish from tuna, marlin, and mahi mahi as well as countless marine mammals. As a recreational fisherman, boater and lover of the ocean, its critical to keep this area open to all. Furthermore, there are commercial fishermen who depend on this area to earn their living and provide for their families. Please allow unrestricted access to the area of the Vineyard Wind project.	<p>Section 3.9.2 of the FEIS has been revised to discuss vessel access to the WDA.</p> <p>Fishing activities within the WDA might be impacted to the extent access to the WDA is restricted; fishing gear is entangled with protections placed over cables or around foundations of WTGs or ESPs; and/or maneuverability restrictions within the WDA result in the displacement of fishing vessels.</p> <p>Concerning vessel access to the WDA, it is worth mentioning that temporary limited or restricted access areas (safety zones) may be set up around active construction areas where applicable. However, note that BOEM does not have the authority to restrict access to the WDA during operations. In addition, the USCG has stated that they will not restrict access to the WDA during operations. The USCG's authority to establish safety zones only extends to the boundary of the territorial waters of the United States, which is 12 nautical miles from shore and outside the WDA.</p>
0134-001	The Vineyard Wind project is critical for the Island of Martha's Vineyard and the Commonwealth of Massachusetts. The benefits of the project are environmental; economic; and community.	Thank you for your comment.
0134-002	The project will contribute in a major way to slowing the rate of climate disruption, chiefly by the avoided carbon dioxide emissions of over 1.6 million tons annually. The project has the potential to supply as much as 6% of the Commonwealth's energy consumption.	Thank you for your comment.
0134-003	The project will improve air quality in the region by avoiding over 1,000 tons annually of NOx emissions, which will improve the respiratory health of the Commonwealth.	Thank you for your comment.
0134-004	The project will improve the health of our surface waters both fresh and ocean by avoiding over 860 tons per year of sulfur dioxide emissions, a principal component of acid rain.	Thank you for your comment.

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0135-001	The Vineyard Wind project is crucial and critical step in helping reverse the effects of climate change on the Earth. Its benefits far outweigh its detriments and, as was so eloquently said at the hearing tonight in Vineyard Haven, if we do not reverse the effects of climate change, the fishing industry and others' short term concerns will be moot.	Thank you for your comment.
0135-002	Vineyard Wind will support [Martha's Vineyard] environmentally and economically.	Thank you for your comment.
0136-001	As a long time climate activist I am eager to see wind power developed off the coast of New England to mitigate the carbon footprint of electricity generation.	Thank you for your comment.
0136-002	...it looks like alternative 2 is marginally better than the others, because it only goes ashore in one location causing less disruption of the environment there.	Section 2.5 of the FEIS has been included to identify the agency-preferred alternative.
0136-003	I don't particularly care if there are 80 bigger turbines versus 100 smaller ones, as long as the output remains about 800MW. Though I suspect there may be less environmental disruption with putting in just 80, which would be good.	Thank you for your comment.
0136-004	I know there is going to be short-term disruption of the aquatic life, and I am particularly concerned about the Right Whale population being impacted, but the long term effects of doing nothing would be more destructive ultimately to life in the region.	Section 3.4 of the FEIS includes a discussion of potential effects on marine mammals.
0136-005	I am concerned by the objections of the fishing industry to any wind farm- I think they are being short sighted by not acknowledging the long-term effects of fossil fuel energy generation. The fisheries are already being decimated by the acidification and heating of the oceans- we need to address climate change immediately and on a very wide scale if there are going to be any fish to catch in 50 years.	Thank you for your comment.
0137-001	I stand in strong support of this development which will make use of RI's natural resources to help bolster renewable energy production and protect our environment and coastline which is impacted by climate change.	Thank you for your comment.
0139-001	I would advocate for some monitoring of the effects on waterman and their families. Different fish species may need to be harvested. This may require refitting of gear and the expenses involved. I would advocate for more clear language about use of leased areas by the public.	Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. Additional mitigation and monitoring measures may arise from consultations and coordination with Federal and State resource agencies. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0139-002	The proposed cable landing at Craigville Beach may be problematic. Thousands of visitors are on the beach on any given summer weekend. There are basically two ways out: 1-Craigville Beach Road and then Main Street in Centerville, 2-Strawberry Hill Road...If Vineyard Wind continues as planned, the access via Strawberry Hill Road would be compromised. This will have an economic impact on residents and businesses in the area...I would advocate that the cable on land be placed in a tunnel/culvert large enough to allow human access to inspect	Section 3.4.6.2 of the DEIS included Vineyard Wind's proposed construction timing, including scheduling onshore construction to occur after Labor Day and before Memorial Day, outside of the busiest tourist season; therefore, no change to the FEIS was necessary.

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	and repair the entire distance from landing on Craigville Beach to the point where the cable crosses South Main Street or even Route 28 without having to work in the traveled roadway.	
0140-001	Spacing: 1 mile spacing of turbines is not enough for safe fishing practices. Bad weather, mechanical breakdown while in the area would severely impact the safety of a commercial fishing vessel.	Sections 3.11.2 of the FEIS has been updated to further describe navigational impacts on fishing vessels within the WDA, while Section 3.10 of the FEIS has been updated to further describe the Project's impacts on commercial fisheries.
0140-002	Habitat Impacts: NEFS X feels that the DEIS overstates the potential for reef effects/benefits. There is no real evidence that supports this. It is just as likely that there would be negative effects such as attracting an invasive species with the construction.	FEIS Sections 3.1.2, 3.2.2, and 3.3.2, have been updated to explain potential benefits and caveats of the reef effect and acknowledge the possibility of infestation by invasive species.
0140-003	Scope: The scope of the area analyzed is too small. It needs to address the impacts to all adjacent ecosystems, not just the construction footprint.	BOEM believes that the geographic scope of the analysis is adequate. Refer to Appendix A of the FEIS for a visual representation of the geographic analysis area for each resource.
0140-004	Monitoring: There is no monitoring plan. NEFS X would like to see at minimum a three year pre construction monitoring study to adequately survey and establish a baseline for this area. Sixteen months is not enough given the variance in stock assessments. The monitoring plan should be done by an institution such as SMAST.	Appendix D of the FEIS has updated the comprehensive list of the monitoring and mitigation that has been considered and evaluated for the agency-preferred alternative. Pre-construction survey monitoring has been included in Appendix D of the FEIS and evaluated in the applicable resource-specific sections, particularly Section 3.10 of the FEIS for commercial fisheries.
0140-005	Mitigation: There is no Mitigation Plan. This project has the potential to negatively impact fishing all along the East Coast. Damage to prey species, mortality to marine mammals, displacement of fishing effort can have far reaching effects. An open and transparent negotiation with all parties should be the standard by which we manage this development of our public resource.	Sections 3.2.2 and 3.3.2 of the FEIS have been revised to address biological monitoring, while Section 3.10.2 has been revised to discuss compensation to commercial fishermen. Appendix D of the FEIS has also been revised to include updated list of the monitoring and mitigation that has been considered and evaluated for the agency-preferred alternative.
0141-001	This project is being pushed too fast. There is no environmental impact study. There is history over in Europe where environmental damage has been done due to the installation of wind turbines. The damage was in Scotland and Ireland.	The revised FEIS discusses the current condition of each resource in Chapter 3 and Appendix A.
0141-002	The future impacts on the fishing industry will be tragic and won't be known for years. Fishing grounds will be decimated or off limits. There also could be interruptions in migration patterns of the right whales, cod and flounder, and squid and scallop larva flows. Fishermen do not know what will happen and neither do you.	Sections 3.10.2, 3.4.2, 3.2.2, and A.8.6.2 (Appendix A) of the FEIS have been revised to provide additional discussion of impacts on commercial fisheries and NARW.
0141-003	It's time for you to protect the ocean environment by initiating a monitoring program, one that will be ongoing and look at all the systems and species that could be hurt.	Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. Additional mitigation and monitoring measures may arise from consultations and coordination with Federal and State resource agencies. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0141-004	There is also no mitigation program in place that can do justice to the commercial fishing industries that will be affected.	Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. Additional mitigation and monitoring measures may arise from consultations and coordination with Federal

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		and State resource agencies. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0141-005	The transit lanes should be 4 miles wide.	Section C.5 in Appendix C of the FEIS, has been clarified to indicate that a 2 nautical mile transit corridor or greater was an alternative considered but not analyzed in detail and explained why it was discounted further.
0141-006	The decommissioning plan should include the purchaser of the electricity being responsible for all decommissioning costs when the entity that will hold the bond defaults.	As described in Section 2.1.1.3 of the FEIS, pursuant to 30 CFR Part 585 and other BOEM requirements, Vineyard Wind would be required to remove or decommission all installations and clear the seabed of all obstructions created by the proposed Project. Vineyard Wind would need to obtain separate and subsequent approval from BOEM to retire any portion of the Proposed Action in place.
0142-001	I propose that BOEM delay the Vineyard Wind (VW) project as outlined in their COP by a minimum of 2 years. This delay is requested to allow VW time to complete the legally required environmental surveys regarding their impact on other stakeholders.	Thank you for your comment. EO 13807 on Establishing Discipline and Accountability in the Environmental Review and Permitting Process for Infrastructure Projects states that it is the policy of the Federal Government to complete all federal environmental reviews and authorizations for major infrastructure projects, such as the proposed Project, within 2 years of the publication of the NOI.
0142-002	The COP does not allow for adequate time to establish the environmental impact baselines. VW itself time and again in public reports and statements has admitted that sufficient data do not exist. The State of RI requires at least 5 years of baseline data prior to construction. The US Government has similar requirements.	The revised FEIS discusses the current condition of each resource in Chapter 3 and Appendix A.
0142-003	Rapid installation of any offshore wind farm without these [environmental] baselines are illegal but the regulations are going slack due to environmental pressure and unrealistic political pressure.	Section 1.2 of the DEIS provided a discussion of the Purpose and Need for the proposed Project. As such, no change to the FEIS was warranted.
0142-004	In reading the objections of the RI Fisheries Advisory Board (FAB) and news articles from MA, I was confused by... [the objection that] the wind turbines impact our radar negatively... but I consulted other experts in the Oceanographic field and I would like to share my enlightenment with you here... RADAR would be great for detecting the wind farm structures when they are not rotating. However when they are rotating the reflections from the blades will cause a great deal of noise and confusion. Thus the wind farms are going to limit the usefulness of RADAR in their vicinity, other ships and wind structures will be difficult to see with RADAR when the turbines are spinning. Even on sunny days, ships use radar to navigate and maintain separation between other objects. This is a serious safety concern.	Section 3.11.2 of the FEIS discusses impacts on marine radar. Pursuant to draft USCG conditions for authorizing the Project (submitted in April 2019), Vineyard Wind will conduct a project-specific study of impacts on marine communication, navigation, and radar.
0142-005	In reading the objections of the RI Fisheries Advisory Board (FAB) and news articles from MA, I was confused by... [the objection that] we need to fish from East to West... but I consulted other experts in the Oceanographic field and I would like to share my enlightenment with you here... East to West orientation	Thank you for your comment.

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	<p>based on a standing gentlemen’s agreement is a misrepresentation of this point. What this really means is that over decades of stakeholder use, the fishing community has realized how to maximize their efficiency. This reduces fuel use, effort and increases their profit and safety (less time at sea). When you dig into this deeper and consult the fishermen and the Oceanographers, what you find is that the contours of the seabed (bathymetry, elevation contours) roughly follow an East to West orientation in the lease area for VW. But what they really are doing is mostly following the old LORANC navigation lines. This was already on charts and easy for a diverse community to agree on and work together within a common resource. Fishing boats try to catch along these lines and crustacean anglers wait for prey to cross these lines moving onshore and offshore. Why do the fish and benthic dwellers live this way? At the end of the day, most organisms will try to minimize the energy they spend to live, if they stray far beyond this they could exhaust their energy reserves and die. These ones are removed by evolution. These organisms eat, evade being eaten and reproduce. The ocean is always in motion due to tides, thermodynamics or wind stress. Oceanographic Theory (e.g. A.E. Gill, “Atmosphere - Ocean Dynamics” among many other Oceanographic texts) shows that flow in the ocean will be trapped to follow the bathymetry. The vorticity due to the Earth’s rotation and the difference in pressure when you go across the slope regulate this balance. So for the most part the water is flowing along the contours of the bottom trying to stay at the same level and not progressing to the shore. The waves that you see crashing on the shore are a transport of energy not a transport of mass as occurs in currents. The motion of the water carries plankton with it. Plankton, either zooplankton or phytoplankton serve as food for our species of commercial interest. So fish can find the depth they like and patrol these currents for food. Big fish eating the smaller fish... the benthic dwellers migrate to and from shore in their feeding patterns. So to maximize fishing efficiency, humans have learned to follow these contours which in this case, happen to mostly lie East to West.</p>	
0143-001	<p>Potential damage to sea birds and migratory birds is inadequately proven. It should be mandated that netting be placed under the base of all moving uprights to collect any dead birds, with daily checks observed by non government monitors, and mandated weekly reporting for the total duration of the time the structures are in place. Findings of substantial deaths should result in the removal of the turbines.</p>	<p>Section A.8.3.2 and Appendix D of the FEIS include updated mitigation and monitoring measures that would be implemented to avoid, minimize, and mitigate adverse impacts on birds.</p>
0143-002	<p>In addition, the comparisons to passive solar use of emerging and more effective panels has not been adequately measured in comparison with these turbines. New consumer panels that operate in partial sun and winter conditions with double the effectiveness of current technology are expected on the market in 2022. This new technology can be piggy backed onto existing panels for rapid installation. Other</p>	<p>Considering another technology, such as distributed generation, as opposed to the project proposal would equate to the no action alternative because Vineyard Wind only acquired the rights to develop a wind energy project in its lease. Further revisions to the FEIS were not warranted.</p>

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	new passive solar is on the horizon and should be given a higher priority for the greater control they offer.	
0144-001	Compare the minimal cost to survey sites to the financial, social and scheduling costs it is going to cost from the delays and court cases. Let the citizens profit from this project, not the lawyers. Look what happened for years in MA to result in no offshore wind energy. You need to plan ahead so the next wind farm can go in with ease, and the next and the next. Are we going to lawyer up for each set of turbines to be installed? This should become routine, not a fight and negative political perceptions resulting. We have enough drama in the White House. Please do something balanced and sensible.	Thank you for your comment.
0144-002	The only stakeholder in this proposed project that opposes working together is Vineyard Wind. They have repeatedly ignored the concerns of other stakeholders and bluntly insist on pushing forward due to their risky economic proposal. Why do the citizens, taxpayers and tourists need to pay for their success? Simply read the documents submitted by Vineyard Wind to the State of Rhode Island, who actually has the authority to stand up for the other stakeholders.	Thank you for your comment.
0144-003	The risk with this developer is too great to the citizens. Do not start down a path that is not optimized for all stakeholders. Do not start down a path that will set the stage for the many, many more wind farms to come. Do not start down a path that is going to raise the prices of seafood and increase our dependence on seafood imported from China (e.g. most of our consumed cod). This is not an economically viable plan on many fronts. They are going to fail to meet their schedule.	Section 3.7.2 and Tables 3.7-3, 3.7-4 and 3.7-5 in the FEIS summarize Vineyard Wind's estimates of construction-phase employment, tax revenues (state and local), and operations-phase economic activity that would potentially be generated in Massachusetts by the Vineyard Wind 1 Project. These data were also provided in the DEIS.
0144-004	What Vineyard Wind should be forced to do, by BOEM, is to step back and do the simple geophysical survey for the locations that are beneficial to all. If they would relocate the WTGs in accordance with their negotiations with the Fisherman's Advisory Board as described very well in earlier comments by the RI-CRMC we could all move forward. We will set the initial conditions for the massive development that is to come; we can save lives.	Thank you for your comment.
0144-005	What is the risk to simply surveying again and making a new layout versus attempting to proceed and going to the courts?	While all the action alternatives considered in the DEIS, the SEIS, and the FEIS meet the purpose and need, some of the alternatives could require additional survey work as specified in Chapter 2 of the FEIS.
0144-006	They gave MA until June to rule on their CZMA enforceable policies but they keep making RI try to rush through the process. They are doing this since RI has an Agency that can contest them on behalf of stakeholders and MA does not. From other comments, NY also does not.	Thank you for your comment.
0144-007	It is obvious that Vineyard Wind cares only about the money, so why not do an economic study and take the economically best path, which I suspect will be to	This EIS provides an evaluation of both beneficial and adverse effects of the Proposed Action and the alternatives to the Proposed Action. Per 40 CFR 1502.23, a cost-benefit analysis is only required if it is relevant to the choice

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	simply survey sites appropriate to all the stakeholders who are also making changes for any installation.	among environmentally different alternatives being considered. No edits to the EIS are warranted.
0145-001	Please provide full information to the public and extend the comment period. Vineyard Wind DRAFT COP Vol. II-A October 22, 2018 is incomplete. Sections 1 - 4 are redacted in their entirety. If the main issue is the placement of the wind turbines then please provide sufficient data for the public to make informed comments.	<p>The public comment period for the DEIS for the Vineyard Wind Project was extended until February 22, 2019 due to the government shutdown. Furthermore, BOEM rescheduled the five public meetings and they were held on February 11, 12, 13, 14 and 15, 2019. Appendix C (formerly Chapter 4) of the FEIS was updated with this information as well as information regarding the virtual public meetings held during the SEIS public comment period.</p> <p>Portions of the COP have been redacted due to confidentiality and proprietary information.</p>
0146-001	Imperative vineyard Wind project permitted w/outmost urgency&expedience - allowance of Vineyard Wind(& similar projects) is crucial to welfare of Nantucket,C&I, Mass., greater region, nation& planet.	Thank you for your comment.
0147-001	American Bird Conservancy has some concerns with the Appendix III-O Vineyard Wind Spring Tern Survey. We appreciate that these boat surveys attempted to record flight heights of birds, but boat surveys are inadequate in estimating such factors. First, the boat surveys only sample during fair weather (sea state 2-4 on the Beaufort Scale, which qualifies as up to about 15 knot winds, or 17 mph), and birds tend to fly at higher heights during higher winds (Ainley 2015). Second, boat surveys are notorious for underestimating flight heights (Johnston and Cook 2016 and Harwood et al. 2018). Advancements in digital aerial survey technology in the last couple of years have shown that many collision and displacement vulnerability scores are likely to be higher than estimated in previous studies based on boat surveys, particularly for gannets and terns. Johnston and Cook (2016) showed that boat surveys underestimate flight heights, where over 50% of terns and gannets were estimated within the rotor swept zone (RSZ) in digital aerial surveys, compared to less than 15% of both species observed in the RSZ during boat surveys (see Table 2 of report). This underestimation of flight heights in boat surveys was additionally validated with the use of drones (Harwood et al. 2018). Given the paucity of information on flight heights that is specific to the proposed site, a scientifically rigorous monitoring plan will be necessary to adequately minimize and mitigate birds at risk of collision and displacement. -----Ainley, D., Porzig, E., Zajanc, D. and Spear, L. (2015). Seabird flight behavior and height in response to altered wind strength and direction. <i>Marine Ornithology</i> 43: 25–36. -----Johnston, A., & Cook, S. C. P. (2016). How High Do Birds Fly?: Development of Methods and Analysis of Digital Aerial Data of Seabird Flight Heights. <i>British Trust for Ornithology, Report No. 676</i> , 53pp. -----Harwood, A. J., Perrow, M. R. and Berridge, R. J. (2018). Use of an optical rangefinder to assess the reliability of	Parameters used to model predicted bird occurrence in the EIS are based on the best available science at the time of publication. The MDAT dataset (Curtice et al., 2018; Kinlan et al., 2016) was used to support a regional analysis of survey data and the MassCEC dataset (Veit et al. 2016) dataset was used to analyze local scale patterns of abundance. A framework for post-construction monitoring program for birds and bats will be developed in coordination with applicable Federal and State resource agencies. No additional monitoring or mitigation measures relative to birds were included in the FEIS. However, additional mitigation or monitoring measures and/or modifications to existing mitigation and monitoring measures may be adopted in the ROD as a result of ESA Section 7 consultation with USFWS.

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	seabird flight heights from boat-based surveyors: implications for collision risk at offshore wind farms. <i>J. Field Orn.</i> 89(4): 372-383.	
0147-003	<p>Recommendation: Monitoring Program: If Vineyard Wind wishes to proceed with collecting flight height information on boat surveys, then, at the very least, they should use range finders designated specifically to measure heights at different distance bins from the observer (see Harwood et al. 2018). However, this is not enough, as other methods are much better at estimating flight height (e.g., digital aerial imaging surveys, radar, or tracking studies). Without the use of range finders, they may as well continue without collecting information on flight heights during boat surveys. In fact, we encourage Vineyard Wind to continue to conduct boat surveys, so that they may be able to analyze their pre- and post-construction surveys using “Before, After – Control, Impact” (BACI) or “Before-After Gradient” (BAG) protocols. In other words, they have set an important baseline against which the results of future pre- and post-construction surveys should be compared, using the same methods. Controlling the method over which distribution and abundance data on birds are collected will allow the surveyors to evaluate displacement over the long term. For example, Mendel et al. (2019)⁴ used a BACI approach with 14 years of pre-construction data and 3 years of post-construction data from boat-based and aerial surveys. They showed that wind facilities in the North Sea caused a loss (i.e., reduction and redistribution) of loon habitat, which could lead to indirect long-term effects on their populations. To adequately quantify flight heights, Vineyard Wind and other developers will need to conduct additional surveys designed for this purpose, for example high resolution digital aerial imaging. Previous studies have found that boat- and aerial surveys each provide important complementary information when it comes to estimating the exposure of birds to offshore wind energy development (Camphuysen et al., 2004; Camphuysen and Garthe, 2004). For example, boat surveys are better at identifying the foraging behaviors of small seabirds and providing in situ data on fish biomass via echosounder (i.e., “fish finder”), whereas digital aerial surveys are better at identifying large submerged animals, such as marine mammals and sea turtles (Goyert et al. 2018). If Vineyard Wind proceeds with high resolution digital aerial surveys, then we recommend that they include control plots adjacent to the wind turbines, for both pre- and post-construction surveys. However, such “reference” or control plots (without turbines) will require careful selection based on oceanographic characteristics (e.g., depth, distance to shore, and productivity) to ensure that they are representative of the treatment plots (with turbines). This will help to remedy the lack of an adequate baseline due to limited pre-construction survey time. We urge Vineyard Wind and other developers in the region to implement a suite of complementary survey methods to adequately assess the collision and</p>	<p>Parameters used to model predicted bird occurrence in the EIS are based on the best available science at the time of publication. The MDAT dataset (Curtice et al., 2018; Kinlan et al., 2016) was used to support a regional analysis of survey data and the MassCEC dataset (Veit et al. 2016) dataset was used to analyze local scale patterns of abundance. A framework for post-construction monitoring program for birds and bats will be developed in coordination with applicable Federal and State resource agencies. Additional monitoring or mitigation measures relative to birds were included in the FEIS. However, additional mitigation or monitoring measures and/or modifications to existing mitigation and monitoring measures may be adopted in the ROD as a result of ESA Section 7 consultation with USFWS.</p>

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	<p>displacement vulnerability of birds during the 30-year lease period. -----Mendel, B. Schwemmer, P., Peschko, V., Müller, S., Schwemmer, H., Mercker, M., Garthe, S. 2019. Operational offshore wind farms and associated ship traffic cause profound changes in distribution patterns of Loons (<i>Gavia spp.</i>). <i>Journal of Environmental Management</i> Volume 231: 429-438 -----Camphuysen, C. J., Fox, A. D., Leopold, M. F., and Petersen, I. K. (2004). Towards standardised seabirds at sea census techniques in connection with environmental impact assessments for offshore wind farms in the U.K. Pages 1–38 in <i>A comparison of ship and aerial sampling methods for marine birds, and their applicability to offshore wind farm assessments</i>. Royal Netherlands Institute for Sea Research, Texel, Netherlands. -----Camphuysen, C. J., and Garthe, S. 2004. Recording foraging seabirds at sea: standardised recording and coding of foraging behavior and multi-species foraging associations. <i>Atlantic Seabirds</i>, 6: 1–32. -----Goyert, H.F., Gardner, B., Veit, R.R., Gilbert, A.T., Connelly, E., Duron, M., Johnson, S., Williams, K., (2018). Evaluating habitat, prey, and mesopredator associations in a community of marine birds. <i>ICES Journal of Marine Science</i>, 1-11.</p>	
0147-004	<p>We are considering a combination of the proposed Alternatives in the EIS (e.g., Alternatives A, B, C, E), but require more detailed information in the subsequent draft of the EIS. As explained in our prior letter, we ask for further discussion of Alternatives A and B, with respect to how they will help minimize impacts to impacted bird species (Piping Plovers and Least, Common and Roseate Terns), particularly given the proposed mitigation stated in Appendix D (i.e., time restrictions on activities near the alternative cable landfall sites).</p>	<p>Section A.8.3 in Appendix A of the FEIS has been updated to include a discussion of mitigation measures for terns and piping plovers. Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. Additional mitigation and monitoring measures may arise from consultations and coordination with Federal and State resource agencies. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision. No additional mitigation or monitoring measures relative to birds were included in the FEIS. A detailed discussion of potential impacts as well as the potential benefits of proposed mitigation measures to ESA-listed species is provided in the Biological Assessment submitted to USFWS, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/.</p>
0147-005	<p>An avian tracking study by Loring et al. (in review) should be able to provide more information to inform Alternative E. The final report has been delayed for release due to the government shutdown, but we urge BOEM to consider its results to inform Alternative E. Alternative E increases the rotor height from 27-191m (8 MW turbines) to 31-212m (10 MW turbines). Roseate Terns tend to fly below and within the lower limits of the rotor swept zone, while other migratory species (e.g., Piping Plovers, Red Knots) tend to fly above and within the upper limits of the rotor zone (Loring et al. 2018). There is a chance that increasing the lower limit of the rotor height to 31m would reduce the collision risk of Roseate Terns, by avoiding their dominant flight heights. However, there exists a tradeoff in identifying which other protected birds (e.g., Piping Plovers, Red Knots) may be at greater risk of increased rotor height. We strongly urge BOEM to take this</p>	<p>A discussion of Loring et al. 2018 and 2019 relative to Roseate Tern, Piping Plover, and Rufa Red Knot flight heights is provided in Section 3.1 of the Biological Assessment submitted to USFWS. The Band Collision Risk Model used the 9.5 MW (taller) turbines to model predicted collision mortality. In both cases Piping Plover and Rufa Red Knot mortality rate was estimated as zero.</p> <p>Section 3.3.2 of the FEIS includes a discussion on impacts on fish species. Section A.8.3 in Appendix A of the FEIS includes a discussion on listed species, and a discussions of effects for each alternative. The Biological Assessment submitted to NOAA can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/.</p>

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	into consideration when identifying the optimal level of mitigation, and whether Alternative E provides the least impact to birds. ----Loring PH, McLaren JD, Smith PA, Niles LJ, Koch SL, Goyert HF, Bai H. 2018. Tracking movements of threatened migratory rufa Red Knots in U.S. Atlantic Outer Continental Shelf Waters. Sterling (VA): US Department of the Interior, Bureau of Ocean Energy Management. OCS Study BOEM 2018-046. 145 p.	
0147-006	Additionally, as explained in our prior letter, we recommend a revision of the collision risk assessment of Roseate Terns, Piping Plovers and Red Knots, using conservative avoidance rates that are supported by the literature (see biological assessment (BA) conducted by the US Fish and Wildlife Service). This is necessary to justify whether an incidental take permit should be required for the Threatened and Endangered species exposed to the Vineyard Wind project.	Citations for avoidance rates used in the Band Collision Risk Model are included in the Biological Assessment submitted to USFWS. Section A.8.3.1 in Appendix A of the FEIS includes a discussion of listed species status as well as the Biological Assessment submitted to USFWS, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ .
0147-007	To reiterate the summary from our prior letter: in their current form, the COP and EIS are incomplete without a transparent, scientifically rigorous monitoring, minimization, and mitigation plan. The monitoring, minimization, and mitigation plan should be approved by a non-affiliated avian stakeholder advisory group, with state and federal agency oversight. Long term (>5 years) pre- and post-construction studies need to follow “Before, After – Control, Impact” (BACI) or “Before-After Gradient” (BAG) protocols (e.g., with appropriately-selected control plots adjacent to the Vineyard Wind lease area for comparison). Such studies should be conducted independently from the developer (i.e., supported through a bird mitigation fund) and be systematically designed to accurately and precisely quantify the collision and displacement vulnerability of protected birds to offshore wind energy development. Mortality estimates need to be submitted to the overseeing agencies (e.g., USFWS, MassWildlife) and detection-and-curtailement systems tested and installed (for larger bird species, such as kittiwakes and gannets), along with deterrent technology.	Section A.8.3 in Appendix A and Appendix D of the FEIS have been updated to include the mitigation and monitoring measures that would be implemented to avoid, minimize, and mitigate adverse impacts on birds. Pre- and post-construction monitoring plans, if required, will be developed in coordination with the USFWS during the course of ESA Section 7 consultation. No additional monitoring or mitigation measures relative to birds were included in the FEIS.
0147-008	We also recommend that Vineyard Wind follow an adaptive management plan based on the results of the monitoring, minimization, and mitigation plan (see ABC’s comments on BOEM’s EA). This needs to include the reassessment of a Section 7 ESA consultation (i.e., determining the likelihood for adverse effect).	Effectiveness of the mitigation and monitoring measures would be required of Vineyard Wind as a condition of COP approval pursuant to 30 CFR § 585.633. Appendix D of the FEIS includes monitoring efforts proposed that are intended to identify trends and possible means for improvements through refinement and are a critical element of mitigation. Continued consultation with resource agencies has occurred during the development of the FEIS, and any additional monitoring or mitigation measures as part of that process that are not already included in Appendix D of the FEIS may be included in the ROD, if the COP is approved or approved with modifications.
0148-001	[Commercial fishing] businesses support hundreds of fishing families and form the backbone of our area’s coastal economy. It is of paramount importance that	Please see revised Section 3.10 (formerly 3.4.5) of the FEIS for a discussion on commercial fisheries and for-hire recreational fisheries.

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	any Environmental Impact Statement prepared for projects off our coast accurately account for the impact that the project may have on the commercial fishing industry here. Unfortunately, the DEIS as it currently stands, does not inspire confidence that such an accounting is taking place. In our review of Section 3.4.5 (Commercial Fisheries and For Hire Recreational Fishing) we found that 75% of the tables containing publicly accessible data contained errors including mixing up landings between years or not accurately representing the value of landings in a given year. The fact that these issues (and others, fully detailed in our attached letter) occurred throughout this section of the report leads us to the inescapable conclusion that this report does not represent the quality of work that the American taxpayers deserve. If the remainder of the report is written with the same lack of care and attention to detail on display in Section 3.4.5, how can stakeholders trust any of it? This section needs a careful rewriting, and the entire EIS needs another thorough review to ensure that comparable errors are not included throughout the document.	
0148-002	Table 3.4.5-3: Years are misreported. The 2011 column is actually 2015 data. The 2012 column is 2016 data. The 2014 column is 2012 data. The 2015 column is 2014 data, and the 2016 column is 2011 data. Additionally, several values for Chatham, MA and New Bedford, MA are misreported. The correct information can be found in Table 11 in the Rhode Island DEM’s analysis (Livermore 2017).	Section 3.10.1 of the FEIS has been revised and the data have been updated.
0148-003	Table 3.4.5-4: Again, years are misreported. The 2011 column is actually 2016 data. The 2012 column is actually 2011 data. The 2013 column is actually 2012 data. The 2014 column is actually 2013 data. The 2015 column is actually 2014 data, and the 2016 column is actually 2015 data. Additionally, many of the values listed are incorrect for otter trawl and scallop dredge. The actual data can be found in Table 18 of the Rhode Island DEM analysis (Livermore 2017).	Section 3.10.1 of the FEIS has been revised and the data have been updated.
0148-004	Table 3.4.5-6: Again, years are misreported. The 2011 column is actually 2013 data. The 2012 column is actually 2015 data. The 2013 column is actually 2011 data. The 2014 column is actually 2012 data. The 2015 column is actually 2014 data. The 2016 column appears to be correct. The actual data can be found in Table 25 of the Rhode Island DEM analysis (Livermore 2017).	Section 3.10.1 of the FEIS has been revised and the data have been updated.
0148-005	This misreporting has a dramatic effect on how the data look. For example, the way Table 3.4.5-4 is currently written, the value of combined landings over time appear to be decreasing, while in reality, they are increasing.	Section 3.10.1 of the FEIS has been revised and the data have been updated.
0148-006	Table 3.4.5-2 (data from Kirkpatrick et al. 2017) appears to be correct, meaning that 75% of the tables produced using publicly available datasets are inaccurate.	Section 3.10.1 of the FEIS has been revised and the data have been updated.
0148-007	There are three additional tables (5, 7a, and 7b) that were produced with data from personal communications, and are therefore not able to be cross-referenced by a third party reviewer. Given the dismal percentage of correct reporting using	Data provided in are publicly available at https://www.boem.gov/Renewable-Energy-GIS-Data/ . No change since DEIS.

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	publicly available data, it is difficult to trust that these tables are reported accurately.	
0148-008	...in tables 7a and 7b, it is unclear whether the “top seven FMPs” refers to the top seven in the region or the top seven in the WDA. Please make this clear.	Section 3.10.1 of the FEIS has been revised to clarify.
0148-009	Another dataset that appears to exist only as a personal communication with NOAA was used to develop Figure 3.4.5-3. This graphic violates basic tenets of appropriate data reporting laid out by the National Center for Educational Statistics in their “NCES Kids Graphing Tutorial” (National Center for Educational Statistics 2019). Line graphs are appropriate for reporting trends over time, not across categories. Also, the figure legend is wrong. All of these missteps together make the figure difficult to interpret and further undermine our trust in this document.	Section 3.10.1 of the FEIS has been revised, as well as the figure.
0148-010	In Figure 3.4.5-4, it is unclear why lobster fishing data from outside the region of interest is included. Trap fishing for lobsters is spatially managed, with each permit holder only able to fish in areas where he / she has a history of fishing. Therefore, it is not possible for harvesters to easily transfer between areas, should the lobster fishery in their permitted area collapse. Thus, the inclusion of lobster pot landings from the North Shore and Cape Cod Bay are largely irrelevant to the DEIS. We would encourage decreasing the spatial coverage of this figure to allow for better visibility of the areas actually impacted by the Vineyard Wind project, as is the case in most of the other maps in Section 3.4.5.	Figure 3.10.-3 on Lobster Pot Landings in Section 3.10.1 of the FEIS shows the importance of lobster resources in the WDA compared to other, nearby locations. This is a valid approach where the relevance of a resource is shown with respect to the total resource/effort. The FEIS includes revisions to this figure.
0148-011	Figures 3.4.5-2, 5, and 6 are misleading as well. The maps purport to show “Fishing Intensity” and on page 3-186 are used to justify the obviously false statement that Lewis Bay itself has “high to very high density of fishing vessels targeting squid, medium high density of vessels targeting surfclam and ocean quahog, medium-high to high density of vessels targeting scallop...”. These graphics currently purport to demonstrate “Fishing Intensity.” However, VMS tracks also include non-fishing activity, such as transiting. For example, in Figure 3.4.5-5 clear transit lanes are visible where vessel traffic is concentrated coming out of New Bedford before spreading out into fishing grounds west and northwest of the Vineyard Wind Lease Area.	Section 3.10.1 of the FEIS clarifies that the figures show fishing vessel density.
0148-012	There is certainly value to including transit lanes in these figures; however, it needs to be made absolutely clear that these figures represent both fishing effort and transit, NOT solely fishing effort. The absence of this distinction artificially and incorrectly increases the amount of area that could be considered “fishing grounds,” potentially reducing the relative proportion of fishing effort impacted by the wind project. In the interest of providing an honest accounting of the projects impact, this distinction must be made. If maps of “fishing effort” are desired, simply producing the same maps but filtering out VMS tracks > 4 knots	Section 3.10.1 of the FEIS clarifies that the figures show fishing vessel density.

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	would be a better indicator. Additionally, removing any tracks inside state waters (as VMS is used in federal waters fisheries) would provide another filter to pull out slow-speed transiting in harbors / canals.	
0148-013	The “Conditions and Trends” section of this analysis is also misleading....As written, this section suggests declining landing values. However, selecting years of high landing value to compare with 2017 is an inappropriate way of looking at this data. For example, the surfclam/ocean quahog value in 2017 is 81% higher than it was in 2012, and the mackerel/squid/butterfish value in 2017 is almost eleven times higher than the 2007 value. A more informative look at the data would be to z-standardize it across each fishery. Z standardized values describe deviation from the mean in number of standard deviations, such that a z-score of 1 indicates a value that is one standard deviation above the mean. Z scores are calculated as $z=(x-\mu)/\sigma$, where x is the point of interest, μ is the mean of the data set and σ is the standard deviation of the data set. ... Modeling these values over the time series available shows no trends for four fisheries (scallop, multispecies, mackerel/squid/butterfish, and monkfish), negative trends for two fisheries (surfclam, $\beta = -0.24$, $p = 0.003$; skate, $\beta = -0.21$, $p = 0.014$), and a positive trend for one fishery (fluke/scup/black sea bass, $\beta = 0.26$, $p < 0.001$). If BOEM is not willing or able to present a similar trend analysis, you should at least remove the inappropriate language currently used to describe trends.	Section 3.10.1 of the FEIS has been revised to provide clarification on the conditions and trends.
0148-014	The statement is made that “More than 70 percent of the Jonah crab catch landed in southern New England came from the region that includes portions of the WDA and OECC.” Why is this fishery barely mentioned in Section 3.4.5?	Section 3.10.1 of the FEIS was revised to provide additional information on Jonah Crab in the WDA.
0148-015	The statement is made that “BOEM could further reduce potential impacts as a condition of COP approval, requiring Vineyard Wind to conduct long-term monitoring to document the changes to ecological communities on, around, and between the WTG foundations and other benthic areas disturbed by the proposed project, including protected species movement and habitat use as well as to centrally fund long-term regional monitoring of population level impacts.” Does BOEM intend to do this? If so, please include such language; if not, please remove this language as a potential option for mitigation / monitoring.	Section 2.2.1, Section 3.3.6.3, and Appendix D of the DEIS included a discussion of monitoring and mitigation proposed for the Project. Section 3.3.2 of the FEIS has provided additional language for monitoring. Additional monitoring requirements and mitigation measures, if any, will be developed in coordination with the NMFS and included in the Record of Decision.
0148-016	The impacts of jet plowing on species with demersal eggs or pelagic eggs are acknowledged on pages 3-76 and 3-77. Are there any plans to enforce seasonal prohibitions on jet plowing to protect these eggs? If not, why was that alternative not considered in this analysis? Similar closures to protect other species are mentioned, so why not commercially valuable fish species?	Section 3.3.2 of the FEIS has been revised to explain why the loss of a fraction of eggs and larvae would not likely have a population-level impact. Section 2.2.1, Section 3.3.6.3, and Appendix D of the DEIS included a discussion of monitoring and mitigation proposed for the Project. Section 3.3.2 of the FEIS has provided additional language for monitoring. Additional monitoring requirements and mitigation measures, if any, will be developed in coordination with the NMFS and included in the Record of Decision.

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0148-017	Why are the only alternatives considered to have the same impacts (Table 2.4-1)? Were only a narrow range of options considered? It seems odd that there are no differences between any alternatives for air quality, water quality, birds, bats, coastal habitat, benthic resources, finfish/inverts/EFH, marine mammals, sea turtles, demographics/economics, cultural/historical resources, commercial fisheries, land use, or other uses (14 out of 18 impact categories). The only categories that showed differences centered around the proposed landfall in Lewis Bay.	Please see Chapter 2 for a discussion on additional alternatives BOEM considered.
0149-001	Analytical Inconsistencies: There are several instances in the DEIS and COP where significant inconsistencies exist in the descriptions of fisheries and the analysis of impacts from the proposed action. Where these disparities arise from the content of the COP (and particularly in studies that Vineyard Wind has conducted), BOEM has the federal responsibility to conduct an independent and comprehensive review to determine their accuracy. In but one example, references to the lobster fishery include: 1. “[A]n estimated five to six lobster boats fished in the Vineyard WLA” (COP Section 7.6.2.2, Volume III; Epsilon 2018); 2. “No pots and traps or fishing effort by longline occurred in the WDA or along the OECC.” (COP Section 7.6.2.2, Volume III; Epsilon 2018); and 3. “Following engagement with commercial fishermen, Jim Kendall, Vineyard Wind’s Fisheries Representative, estimates that the majority of fishing vessels operating in the WDA are fixed gear vessels (i.e., gillnetting and lobster pot fishermen)” (Kendall, 2016; Vineyard Wind, 2011). These statements, and others in the COP and DEIS as noted in these comments and those of other fishing industry members, are clearly inconsistent and make it difficult to provide informed comments regarding its analysis and conclusions.	The most recent information on lobster revenue and landings (provided by NOAA) has been incorporated in the revised Sections 3.10.1 and 3.10.2 of the FEIS. Information in the EIS has been checked for consistency and BOEM is confident that the information in the EIS is accurate.
0149-002	Impacts Characterization: The DEIS defines “moderate” impacts as those where “[i]mpacts on the affected activity or community are unavoidable.” RODA feels that many of the impacts characterized as “moderate” could in fact be further mitigated or avoided with proper research and safeguards that have not been contemplated in the DEIS. These are too numerous to specifically address in these comments, therefore we have highlighted some of the major ones and encourage BOEM to continue to engage in communications with fishing industry members—and support relationship-building between the offshore wind energy and fishing industries—to identify existing or innovative methods to minimize impacts and promote coexistence.	Thank you for your comment.
0149-003	We also submit that the DEIS’s list of “unavoidable” impacts should include ecosystem-level changes related to shifts in habitat suitability, species composition and abundance, and other factors.	The EIS analyses has not concluded that the Proposed Action or any of the action alternatives would result in ecosystem-level changes related to shifts in habitat suitability, species composition and abundance, and other factors. Therefore, no additional changes in the FEIS were warranted.

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0149-004	Wind Turbine Generator (WTG) Layout Orientation: As noted in the DEIS, RODA continues to support an East-West turbine orientation to slightly lessen (but not eliminate) impacts to current fishing vessel operators in the WDA, per Alternative D2 (Section 2.1.4.2). As stated in the DEIS, additional survey work would be required to re-orient WTG placement, potentially delaying the construction schedule and timing of the project for at least one year (Section 2.1.4.2). RODA supports additional survey work implementing layout alternatives to reduce moderate and major impacts to the fishing community. The DEIS concludes that conducting such survey work would render the project economically unviable, but provides no justification in the record for that conclusion. It is therefore impossible to provide meaningful comments comparing the proposed action with Alternative D2.	While all the action alternatives considered in the DEIS, the SEIS, and the FEIS meet the purpose and need, some of the alternatives could require additional survey work as specified in Chapter 2 of the FEIS.
0149-005	WTG Spacing: As we have commented previously, the spacing between turbines is likely to be more indicative of impacts to fishing activity than the orientation. Even if the WDA was designed with an East-West orientation, there would remain a substantial number of fishing industry professionals who would not be capable of safely operating their vessels and gears within the array if turbines are separated by only one nautical mile or less. According to RODA members and input from the fishing industry at large, most commercial fisheries will not be able to operate in an array with spacing of only one nautical mile. If wider spacing between WTGs was implemented, additional vessels would be able to actively fish in the WDA, but each gear type and vessel size would have specific operability thresholds that have not yet been studied or conclusively established. Again, RODA supports additional survey work and collaboration between BOEM and Vineyard Wind and other developers to investigate adequate turbine spacing to allow for fishing efforts with multiple gear types and vessels at this, and future, wind development sites.	Section 3.10 of the FEIS has been revised to provide additional information related to the use of the Project area by vessels and project layout. Section 2.5 of the FEIS has been included to identify the agency-preferred alternative. Vineyard Wind’s supplemental navigational risk assessment (COP Volume III, Appendix III-I, Epsilon 2020a), which BOEM and USCG reviewed and found adequate for the purposes of this EIS, demonstrates that it is technically possible to fish and transit through the proposed project. Section 3.10 includes a discussion of access and maneuverability with the WDA by fisherman.
0149-006	RODA strongly disagrees with the statement in the DEIS that there would be a net increase in environmental impacts if the spacing between turbines were to be increased to 1.5 or 2 nautical miles. While larger spacing between turbines would increase the initial proposed project area, an increase in spacing to 1.5 nautical miles would still appear to accommodate the placement of ample turbines within the lease area to achieve the project’s stated purpose and need of procuring 800 megawatts (MW) of offshore wind energy. Furthermore, it is irresponsible to cite the negative environmental impacts of cable laying and increased vessel trips during construction (as referenced in the DEIS) without also looking at the potential environmental benefits of increasing the spacing between turbines—environmental benefits that could include, but would not be limited to, decreased biological impacts to fishery stocks due to larger undisturbed area between	Resource-specific sections of Chapter 3 and Appendix A of the FEIS have been updated to include an updated discussion of potential adverse and/or beneficial impacts of the Project. While various alternatives may modify the degree of impacts, none were found to reverse the direction of an impact. The description and analysis of Alternative D1, as well as that in Section C.5 in Appendix C of the FEIS have been revised to acknowledge the benefits of those alternatives, as well as the impacts.

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	turbines, reduced economic impacts if more fishing could continue within the project area, and fewer safety risks.	
0149-007	<p>Range of Alternatives Regarding Project Design: The DEIS does not sufficiently present all reasonable alternatives to the proposed action. RODA disagrees with the conclusion that “Alternative Spacing between Wind Energy Turbines” (Section 2.1.7) would not meet the purpose and need of the project and thus we believe it should be considered as a full alternative to the Proposed Action. With the information provided by the DEIS, we believe that rough calculations show that a spacing of 1.5nm between turbines would fit the purpose and need of the project. Approximately 800 MW are proposed to be generated from this project, and it is our understanding that Vineyard Wind plans to construct turbines with an individual output of 9.5 MW. In the current proposed action, 100 turbines will be constructed in the lease area, with locations for an additional six turbines for a total of 100-106 turbines in the VW Lease Area. It is unclear whether spacing of 2 nm between turbines would allow the project to meet its stated goals, but many fishing industry participants support a minimum 2-nm spacing so this possibility should be fully considered. According to Figure 2.1-6 (page 2-17) the layout of alternative spacing of 1.5nm between turbines shows 14 turbines, out of 106, outside of the lease area. With the expectation of installing turbines that generate 9.5 MW, the 800 MW threshold for this project will still be met with only 92 turbines – all of which fit within the current lease area. There is no information that suggests that the 800 MW must be procured from within only one portion of the overall lease area (the WDA) in order to preserve room for future projects, when the entire WLA was delineated and leased without a specific procurement need. Thus, it is necessary for an alternative including increased turbine spacing to be added to the Final Environment Impact Statement and be explored in full.</p>	<p>BOEM decided not to analyze in detail an alternative that contemplates the use of 84 9.5-MW WTGs, spaced 1.5 nautical miles between them. When compared to other alternatives being analyzed in detail (i.e., Alternatives A, B, C, and E), this alternative will substantially increase the footprint of the project and its environmental impacts—particularly due to increased seabed disturbance for inter-array cables and increased duration of vessel trips during construction and operations. While increased spacing between WTGs would allow for better maneuverability of fishing vessels that are actively fishing within the Project area, the substantial increase in project footprint would also increase the OCS areas that are subject to navigational impacts resulting from the project by introducing WTGs in OCS areas not reached by other alternatives (i.e., Alternatives A B, C and E). Therefore, this alternative was not analyzed in detail because BOEM expects it to result in more impacts than those expected from other alternatives being fully analyzed (e.g., Alternatives A B, C, and E). Section C.5 and Figure C.5-1 in Appendix C of the FEIS show that spacing 1.5 nautical miles or greater would exceed the boundary of the Vineyard Wind Lease Area, which would not be consistent with the Purpose and Need of the proposed Project. To achieve 800 MW utilizing the 9.5 MW machine, which Vineyard Wind announced in November 2018, the proposed Project would only need 84 turbines, but the greater spacing options would still exceed the limits of the boundary.</p>
0149-008	<p>Cable Burial: The DEIS currently does not provide sufficient analysis that a 5- to 8-foot burial depth of cables would be adequate to prevent exposure of cables (Section 3.4.5.3). Cable exposure is problematic for many reasons, and RODA suggests Vineyard Wind conduct thorough studies to ensure the best location and depth of cables to limit exposure risk, as well as the risk of impacts from heat or electromagnetic fields that may transfer from the cable to benthic sediment or the water column. ...Robust approaches for evaluating cable burial best practices exist, and RODA recommends that the developer follow guides used in European offshore energy projects such as the Cable Burial Risk Assessment (CBRA), or similar methodology, to reduce exposure risk... It is imperative that the cable is not only initially buried to the correct depth, and that its depth is in fact verified by permitting authorities, but that a monitoring system is in place to ensure that it remains sufficiently below the surface...</p>	<p>Sections 2.1.1 and 3.10.2 of the FEIS have been updated to address cable burial risk for the proposed Project. The OECC would have a target burial depth of up to 5-8 feet (1.5-2.5 meters). Vineyard Wind considers cable burial a priority, and would use iterative analyses of survey data, advanced burial techniques, and micro-routing to maximize burial and minimize the need for cable protection (Epsilon 2018a). Vineyard Wind as performed a cable burial risk assessment and based on survey data, Vineyard Wind expects that burial of the inter-array cables would be successful without requiring cable protection. Vineyard Wind would survey the cable burial depth after construction and would monitor the depth periodically. The DEIS already considered a potential mitigation measure of requiring a minimum cable burial depth.</p>

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0149-009	protective devices such as mattresses pose risks to fishing operations, safety, and gear. These risks should be more fully described and analyzed in the DEIS. RODA requests both the project developer and BOEM to continue to work with the fishing industry to develop solutions for proper cable installation, and to mitigate gear conflicts and loss that may result from cable interactions.	Section 2.1.1 of the FEIS has been updated to address cable burial risk for the proposed Project. The OECC would have a target burial depth of up to 5-8 feet (1.5-2.5 meters). Vineyard Wind is preparing a separate cable burial risk assessment.
0149-010	RODA supports requiring long-term monitoring of cables as referred to in the DEIS (Section 3.4.5.2), but advocates for monitoring to be conducted independently and more frequently than on an annual basis using the best available technological means. In addition to natural threats such as seismic activity, sediment mobility, and submarine landslides, there are numerous anthropogenic activities that pose a risk of cable exposure such as dredging, benthic fishing, and grounding of ships. Due to all of these potential threats, monitoring cables often and thoroughly is important. RODA believes that BOEM should require all developers to partake in regular and independent cable burial status monitoring.	Thank you for your comment.
0149-011	Transit Lanes: RODA remains concerned that the process for identifying the MA/RI WEAs, the execution of power purchase agreements with individual states, and the development of Construction and Operations Plans for offshore wind energy projects have occurred before reasonable transit lanes have been identified for fishing vessels to travel to fishing grounds beyond the lease areas. While we are appreciative that Vineyard Wind and adjacent leaseholders have engaged extensively in conversations to identify such transit lanes, the leasing process must be modified so that necessary transit routes are identified before a developer is bound to terms that render it difficult to modify site plans to accommodate fishing vessels that must safely and efficiently traverse the large lease areas.	Thank you for your comment.
0149-012	As you know, there is still no broad “consensus” on the location nor position of reasonable transit routes throughout the large complex of New England WEAs. To reiterate, the fishing industry “consensus” is that transit lanes must be a minimum width of 4 nautical miles in order to accommodate safe passage, and further studies must be done to ensure that radar interference will not extend beyond that distance.	Sections 2.1.1.2 and 3.11 of the FEIS have been updated to discuss the 2-nautical-mile-wide northeast-southwest navigational safety corridor identified by the Massachusetts Fisheries Working Group on Offshore Wind, as well as USCG’s Final MARIPARS. Section C.5 in Appendix C of the FEIS, has been clarified to indicate that a 2 nautical mile transit corridor or greater was an alternative considered but not analyzed in detail and explained why it was discounted further.
0149-013	At this point, it is extremely difficult for the fishing industry to work toward “back-filling” lease plans with no-build areas to accommodate vessel transit when developers consider them to be essentially voluntary exercises. While most (but not all) of the transit lanes that have been contemplated for the Northeast lease areas to date tend to fall outside of the Vineyard Wind WDA, there is no assurance that any specific area will be designated as a transit lane given the	Sections 2.1.1.2 and 3.11 of the FEIS have been updated to discuss the 2-nautical-mile-wide northeast-southwest navigational safety corridor identified by the Massachusetts Fisheries Working Group on Offshore Wind, as well as USCG’s Final MARIPARS. Section C.5 in Appendix C of the FEIS, has been clarified to indicate that a 2 nautical mile transit corridor or greater was an

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	<p>inability of each of the adjacent leaseholders to achieve agreement on consistency between their project layouts. Other developers have not stated support for the transit lanes that fall to the south of the WDA; moreover, the majority of fishing vessel transit through the WLA actually occurs within the WDA itself. If Vineyard Wind’s preferred location for transit lanes outside of the WDA is not included in the other projects’ COPs, it is unclear that any functional lanes will be designated at all. The fishing industry broadly needs assurance that there are workable options on the table both for our industry and all developers, including the ones that acquired the new leases in the December 2018 auction.</p>	<p>alternative considered but not analyzed in detail and explained why it was discounted further.</p>
0149-014	<p>Fishing vessel transit patterns can be determined from a number of sources including, but not limited to, VMS data, AIS data, fishing vessel plotter information, and knowledge acquired from fishermen themselves. To our knowledge, the first time there was a true evidence-based analysis of such patterns was only when RODA requested one of the National Marine Fisheries Service (NMFS) for a workshop on December 3rd, 2018. This should have been done far earlier for these areas. BOEM must conduct this type of analysis in advance of future lease sales, either through its interagency data access agreements or by working with partner agencies, states, or contractors. It should also not proceed with any leasing or project approvals that may interfere with the ability to delineate transit routes through lease areas until those areas are properly identified.</p>	<p>Thank you for your comment.</p>
0149-015	<p>In addition to the necessary locations and widths of lanes through the arrays to accommodate fishing vessel transit, RODA has concerns about the way such lanes are characterized and evaluated from a broader vessel traffic viewpoint. Modeling and analysis tools that accurately reflect vessel movements and vessel interactions are critical to determine if routing measures are appropriate for all marine traffic and to evaluate the changes in navigational safety risk resulting from different siting and routing scenarios. Even with a “consensus” as to siting, proper modeling and analysis are necessary to evaluate transit lanes and their effects. We believe that the U.S. Coast Guard (USCG) is the only entity with the expertise to perform these analyses and BOEM should defer to any recommendations it issues with regard to vessel transit.</p>	<p>Thank you for your comment.</p>
0149-016	<p>Finally, the DEIS fails to use consistent language in describing transit lanes. It uses “transit corridors” or “transit lanes,” often interchangeably, to reference both access within an array and crossing through an array to access grounds on the other side. “Transit lanes” should refer to those routes necessary to access fishing grounds on the other side of a WEA—or to vessels crossing an array generally—not to fishing within an array. BOEM should continue to work with the USCG, other maritime experts, and the fishing industry to refine how transit lanes will be classified and what navigational principles will apply.</p>	<p>Section 3.10 of the FEIS has been revised to address terminology discrepancies.</p>

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0149-017	<p>Trawl Survey Inaccessibility: RODA is concerned with the inability of fisheries research vessels to access the Vineyard Wind Lease Area as related to the Impacts on Commercial Fisheries and For-Hire Recreational Fishing (Section 3.4.5.3). Fisheries rely on up-to-date and comprehensive data to ensure stock assessments are accurate and inform fishery management. At the most recent New England Fishery Management Council meeting (January 29th, 2019), NMFS stated that it will not be able to operate its survey vessels in WEAs. The loss of its ability to conduct fisheries-independent data collection due to inaccessibility will not only obstruct understanding of stock status within development areas, but will also increase uncertainty in regional stock assessment models. We believe loss of consistency in survey efforts is a significant concern for the fishing industry as it may lead to increased scientific and management uncertainty, and potential decreases in catch limits as required by the Magnuson Stevens Act. Conducting surveys in adjacent or other areas cannot simply make up for survey efforts based on randomized sampling, and thus accuracy of stock assessment models may be diminished.</p>	<p>Sections 3.12.2 and 3.12.1 of the FEIS have been revised to include additional discussion of impacts on survey efforts.</p>
0149-018	<p>The DEIS suggests that “NMFS survey methodology may need to change to account for the inability to sample in certain areas” (Section 3.4.5.3) with no framework for developing such new methodology. RODA intends to work with NMFS to develop these novel methods, which will likely take time and resources for which the DEIS does not account. Impacts to data collection for research purposes in development areas are at best unknown if NMFS (and other research survey vessels) cannot operate in this area or future energy development sites. While impacts to data collection and surveying seem minor when they pertain to a partial lease area, collectively wind energy development areas may critically hinder stock assessments in the region due to the impacts to research methodology and accessibility. We suggest that BOEM looks at this issue from a holistic standpoint and ensure that energy development projects do not come at the cost of scientific certainty needed to support sustainable fisheries.</p>	<p>Additional clarification has been provided in Sections 3.12.2 and 3.12.1 of the FEIS regarding survey efforts potentially impacted by the proposed Project.</p>
0149-019	<p>Navigational Safety: While RODA applauds the proposed Marine Coordinator position to coordinate and communicate Vineyard Wind construction and installation plans with USCG, pilots, port authorities, state and local law enforcement, and commercial operators to decrease risk incidents (Section 3.4.7.3), we are concerned with the lack of a full analysis of vessel navigation in the area. We reiterate that the USCG is the entity with the best expertise to provide information regarding navigational safety, and recommend that BOEM fully adopt any recommendations it provides.</p>	<p>Sections 3.12.1 and 3.12.2 of the FEIS have been updated with additional detail about the status of the FAA process, as well as a reference to the Marine Coordinator Position. Furthermore, Section 3.11.2 (formerly 3.4.7.3) of the FEIS has been updated to include coordination with USCG for considering additional recommendations regarding navigational safety, and to include information about the revised navigation risk assessment for the Project (Vineyard Wind 2019).</p>
0149-020	<p>The current DEIS’s impact analysis is based almost entirely on AIS data from a two-year period. This is not sufficient data to draw conclusions about vessel navigation in the WEA, as: (1) fisheries in the region exhibit significant</p>	<p>Section 3.11 of the FEIS has been updated to include additional information about VMS data, as provided in Vineyard Wind’s Supplemental Navigational Risk Assessment.</p>

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	interannual ecological variability; (2) vessels are not required to use AIS outside of the 12 nm Territorial Sea; and (3) the AIS data utilized in the impact analysis does not include navigation by vessels <65 feet. In order to ensure that incident risk is minimized, we hope that BOEM and developers will work to better include vessels in smaller size classes. We request a full analysis using VMS data, which is readily available as seen by the analysis NMFS did for the NY Transit Workshop on December 3, 2018. (It is our understanding that multiple agencies have access to these data sets and, regardless of which one performs such analyses, we urge closer cooperation to ensure that they are completed efficiently and correctly.)	
0149-021	The DEIS notes that increased traffic is expected at ports, particularly New Bedford (Section 3.4.7.3), leading to traffic jams and increased wait time to enter the harbor. As currently presented, the DEIS does not consider that increased time to market for many fisheries will reduce product value if fishing vessels are required to wait to offload. RODA suggests that mitigation for delayed offloading and determination be addressed prior to the start of construction and installation, and that offshore wind facility [service] vessels give way to fishing vessels returning to port.	Section 3.11.2 (formerly 3.4.7.3) of the FEIS has been revised to address impacts on ports as a result of increased vessel traffic due to construction and installation of the Project.
0149-022	Lastly, while ground-based radar systems are expected to be located a sufficient distance from the WDA to not cause radar interference, the DEIS does not adequately address the potential for radar interference from vessels navigating in or near the WDA. BOEM and USCG have acknowledged this important issue; we believe that it must be fully addressed prior to construction in the development area.	Section 3.4.7.3 of the DEIS included a discussion of impacts on radar and associated mitigation measures; therefore, no changes to the FEIS are warranted.
0149-023	Decommissioning: The DEIS provides very little detail regarding decommissioning requirements, noting instead that “[d]ecommissioning plans are subject to an approval process that includes public comment and government agency consultation.” For example, it says “cables may be retired in place,” but there is no description or analysis of any potential long-term impacts of deactivated cables or how those impacts would be monitored, much less how that decision would be made. The National Environmental Policy Act (NEPA) requires a public comment process and consideration of the environmental impacts of any major federal action. If project decommissioning will not undergo further NEPA review, the DEIS should contain much more explicit detail regarding decommissioning activities. At a minimum there should be assurances as to the process and the factors BOEM will evaluate in making future decisions, in light of the vagueness of the DEIS.	As described in Section 2.1.1.3 of the FEIS, pursuant to 30 CFR Part 585 and other BOEM requirements, Vineyard Wind would be required to remove or decommission all installations and clear the seabed of all obstructions created by the proposed Project. Vineyard Wind would need to obtain separate and subsequent approval from BOEM to perform decommissioning activities, and to possibly retire any portion of the Proposed Action in place. Prior to authorizing decommissioning activities, BOEM will perform a NEPA review of the proposed decommissioning activities.
0149-024	Additionally, RODA requests that future decisions restrict the use of explosives in decommissioning if it does not conduct a NEPA-compliant environmental	Section 2.1.1.3 of the FEIS describes the decommissioning process and requirements.

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	review to assess the potential impacts of that activity, which are unknown to us at this time but could significantly negatively impact fishery resources.	
0149-025	Impacts to Specific Fish Stocks Should be More Thoroughly Considered: ...the DEIS should provide more thorough analyses regarding the impacts of the proposed action to individual fish species and stocks. The DEIS's accompanying Biological Assessments provide some level of detail regarding impacts to protected (endangered) resources, but BOEM relies primarily on its EFH Assessment to describe specific affected fishery resources. While the EFH descriptions overall appear to be accurate, there is much additional information, including life history, stock status, management structure, seasonality, and more, that influence the degree to which negative impacts to a given fish stock may have unusual or augmented biological and/or economic repercussions.	Potential impacts on individual stocks are beyond the scope of this document. However, Section 3.3.2 of the FEIS speaks generally about potential effects on fish and shellfish. The EFH Assessment provides more details on potential effects on specific fish and shellfish.
0149-026	Moreover, significant scientific uncertainty exists regarding the Georges Bank cod stock (that which is found in the WDA and all of the lease areas off of MA and RI). That uncertainty in large part fueled the reductions in catch limits and even led to the analytical assessment of this stock not being accepted during NMFS' most recent operational update meetings. The depleted state of the Georges Bank cod stock, in addition to being concerning in and of itself, has outsized impacts on fishing practices and revenue. It is one component of the Northeast multispecies fishery complex, which is managed as a unit due to the mixed nature of the stocks both in terms of ecological interactions and how they are caught. The majority of the commercial fleet is managed according to a "sector," or "catch share" regime, which provides quota allocations of each stock to groups of fishermen. If a sector reaches its quota of any groundfish stock, it must stop fishing altogether in that stock area. Georges Bank cod has thus become a "choke stock"; if fishermen are unable to avoid catching it while targeting other—and often highly abundant—stocks (such as Georges Bank haddock), they lose the ability to continue to fish for those target stocks. Any further decreases in the Georges Bank cod population that result in lower catch levels will therefore not only jeopardize the recovery of the resource itself, but they will necessarily decrease revenues from all groundfish stocks. Moreover, population estimates for this stock rely heavily on NMFS trawl survey data... reduced survey coverage will increase the scientific uncertainty that is driving the severe catch limitations. The DEIS does not provide any analysis of the true fisheries impacts from the Vineyard Wind proposal in light of this biological and management complexity. Rather, it focuses narrowly on habitat impacts and readily dismisses alteration of juvenile cod Habitat Area of Particular Concern (HAPC) due to the size of the WDA relative to the entire HAPC. RODA requests BOEM and Vineyard Wind to conduct a full, quantitative inquiry into the likely impacts to this depleted resource from the WDA within the HAPC, as well as to	No part of the WDA includes HAPC for juvenile cod. Overlap of the OECC and HAPC for juvenile cod is described in the EFH Assessment. The EFH Assessment can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ . Note that the EIS does not detail likely effects on individual fish stocks, because an assessment of species-specific or stock-specific effects is outside of the scope of this document.

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	gather any necessary information to determine how the stock and fishery would be affected from full build-out of the lease area and adjacent sites.	
0149-027	Winter flounder, for its part, is one of the few fishery stocks in the WDA of specific focus in the DEIS. Although the DEIS states “[l]ocalized loss of demersal eggs could lead to reduced fish recruitment” and “[p]ermanent habitat alteration in the form of scour and cable protection would reduce the habitat for species such as winter flounder,” it simply concludes without further analysis that “this would be limited and BOEM does not anticipate impacts on the flounder stock.” It does not consider that the latest stock assessment, in 2017, concluded that the Southern New England/Mid-Atlantic winter flounder stock is overfished and extended its rebuilding timeline to 2023, nor that flounders are likely to be particularly sensitive to temperature increases associated with cables. As with Georges Bank cod, BOEM must evaluate impacts to the rebuilding timeline and the implications of delayed rebuilding on both the stock itself and on groundfish fishery catches and revenues overall.	As discussed in the revised Section 3.2.2 of the FEIS, studies of heat from buried cables have estimated that temperatures directly above a cable could rise by 0.19 °C (0.342 °F) in sediment and by 0.000006 °C (0.0000108 °F) in the water, which are insignificant as far as fish are concerned (RICRMC 2010). Considering that there are no significant impacts on finfish, invertebrates, and essential fish habitat predicted from the proposed Project, BOEM believes that it is not necessary to evaluate the rebuilding of fish stocks. Note that this document does not specify likely effects on individual fish stocks, because an assessment of species-specific or stock-specific effects is outside of the scope of this document.
0149-028	Analysis of Impacts from Underwater Noise Is Incomplete: The DEIS sections regarding sound impacts to fish populations primarily focuses on noise arising from project construction and its potential effects on squid behavior... With regard to squid (and certain finfish species)... the DEIS over-relies on assumptions that they will simply swim away from noise that exceeds tolerable thresholds, unless they are sessile or too small to swim away, in which case individuals will die but the population will quickly recover. (The DEIS makes similarly unsupported conclusions regarding sedimentation impacts to fish stocks, to which the essence of these recommendations also applies.) We understand that there is a need for further scientific research regarding impacts of underwater noise to specific stocks, including squid, and request additional resources to accomplish such studies. At a minimum, given the currently available information, these predicted impacts can and should be quantified based on how many individuals may be in an area at a given time, and how behavioral changes or mortality to those animals may impact stock abundance and recruitment, including considerations of seasonality and age structure.	In general, commenters have requested very detailed analyses of impacts of the Proposed Action to individual fish stocks, life stages of individual species, and age/sex structure analyses of individual fish stocks. BOEM has reviewed the relevant literature regarding the potential effects of the Proposed Action on all marine life. During that review, there has been no evidence to support that the Proposed Action will have a level of impact necessitating research at the level of detail requested by commenters for this project. However, BOEM recognizes that offshore wind is a new industry in the U.S. and is thus committed to monitoring the effects of the first commercial scale project, just as BOEM and other agencies have studied the impacts of the first demonstration scale project in the U.S. – Block Island Wind Farm.
0149-029	...the DEIS is silent on a wide variety of potential impacts from the sound associated with offshore wind energy facility construction. For example, there is peer-reviewed evidence that loud underwater sounds, and the associated pressure changes or vibrations, are likely to impact the survival and development of fish larvae and invertebrate stocks including scallops, which is not considered in the DEIS.	Section 3.3.2 of the FEIS has been updated to include additional information on acoustic impacts on fish resulting from pile driving activities, including a discussion of proposed hammer energies to be used during pile driving. Acoustic monitoring will be used to ensure that the minimum level of sound attenuation is achieved. Please also refer to the EFH Assessment for a discussion of acoustic related impacts on fish and invertebrates. The EFH Assessment can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ .

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0149-030	Also related to the construction phase, the DEIS states that the PDE covers a hammer size up to 4000 kilojoules (kJ) for monopile foundations, and 3000 kJ for jacket foundations, which is consistent with current equipment specifications. However, its analysis for radial distance to thresholds for fish from impact hammering only includes hammer energies of up to 2500 kJ. We would expect that the increased energy levels would greatly multiply acoustic effects of pile-driving, and the DEIS should reflect this.	Section 3.3.2 of the FEIS has been updated to include additional information on acoustic impacts on fish resulting from pile driving activities, including a discussion of proposed hammer energies to be used during pile driving. Note that Vineyard Wind is not proposing to use impact energies greater than 2,500 kJ. Acoustic monitoring will be used to ensure that the minimum level of sound attenuation is achieved.
0149-031	As to sound impacts from the operational phase of a wind energy facility, BOEM summarily states that “[n]o study has shown any behavioral impact of sound during the operational phase of wind energy facilities” and declares this information “low priority.” To the best of our knowledge, there are also no studies showing that sound from wind energy facility operation does not impact fish behavior, and there is good reason to believe it would. This is an area that absolutely should be further studied, as there is a high probability of impacts. Studies from Europe show that species such as cod may perceive operational noise from wind energy facilities at distances of 7 km or greater...	Section 3.3.2 of the FEIS has been revised for a discussion of operational turbine noise recorded from the Block Island Wind Farm and includes information on sound pressure level measurements from operational WTGs in Europe.
0149-032	...Based on discussions with experts at Rutgers University, we understand that operational noise may impact shellfish too, particularly in early life stages; for bivalves, larval settlement and metamorphosis are highly sensitive processes that may be affected by changes in sound. Recent research has demonstrated that oyster settlement, for example, is highly influenced by underwater soundscapes...	Section 3.3.2 of the FEIS has been revised as a field survey of a Dutch wind farm found no effect of the wind farm on bivalve recruitment (Bergman et al. 2010). Section 3.3.2 of the FEIS has been revised for a discussion of operational turbine noise recorded from the Block Island Wind Farm
0149-033	BOEM relies on assumptions regarding ambient noise at the Block Island Wind Farm (BIWF) to inform its DEIS; this information is not necessarily applicable to the Vineyard Wind lease area, which is much further offshore in an oceanographically and ecologically distinct area.	Section 3.3 of the FEIS has been revised to provide additional discussion of sound attenuation, which includes the best example of an offshore wind farm in the United States.
0149-034	We therefore request: (1) that BOEM require autonomous passive acoustic monitoring devices to record ambient noise in the lease area not only before and during construction, but throughout the life of the project; (2) that BOEM, Vineyard Wind, and/or others conduct studies on the impacts of construction and operational noise to fish populations; and (3) that any impacts found to be in excess of those predicted and analyzed in the DEIS are required to be fully mitigated during any project phase.	As stated in the revised FEIS Appendix D, Vineyard Wind would conduct or fund monitoring of ecological communities in the WDA, benthic resources, fisheries, and protected species. Additional requirements could be incorporated into monitoring plans during coordination with the agencies responsible for managing each resource. 1) As described in Appendix D, PAM would be used before, during, and immediately after construction; additional PAM could be incorporated into monitoring plans. 2) Vineyard Wind will conduct or fund studies of ecological communities in the WDA, benthic resources, fisheries, and protected species. 3) In Nantucket waters, annual monitoring and reporting would be required, as would a plan to mitigate any excess impacts discovered. Note that BOEM has already contracted with NOAA and Woods Hole Oceanographic Institute to study the effects of offshore energy development on black sea bass and on squid. Note also that BOEM regulations require under 30 CFR §585.633b Vineyard Wind to submit certification of compliance with certain terms and

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		conditions annually and to submit a statement identifying mitigation and monitoring methods and their effectiveness and any recommendations for changes.
0149-035	The DEIS Does Not Consider Impacts to Water Flow or Larval Dispersion: The DEIS contains virtually no consideration of the hydrographic effects of placing large fixed structures in the water column to either the physical or biological environment. The most relevant study of these impacts, to our knowledge, was commissioned by BOEM from Dr. Changsheng Chen at SMAST. The DEIS, inexplicably, cites this study to conclude that development of the Vineyard Wind WDA is not likely to influence southward dispersion of larvae, but ignores other pertinent information in the study. For example, with regard to large-scale variability, “the presence of wind turbines can increase the spatial dispersion and speed of larval movement, but will not block the larvae within the wind turbine facility area.” For small-scale variability, “the presence of wind turbines can also decrease the spatial dispersion.” The study bluntly concludes that “the modeling assessment of the impact of the future offshore wind energy facilities on the marine environment should be done with consideration of the wave-current interaction process,” which was not performed in the DEIS.	Section 3.3.2 of the FEIS has been revised to include a discussion of changes to the pelagic environment caused by WTG foundations. An updated discussion of hydrographic effects of WTG foundations is provided in Appendix E Section E.3.3.
0149-036	Benthic invertebrates are likely to be particularly sensitive to disruptions in larval dispersion patterns and sedimentation. They spawn in discrete areas and rely on having the correct currents to distribute larvae to suitable grounds for settlement. Even small-scale disturbances to those pathways—whether from mortality at a spawning site, inability to reach settlement areas, or both—could have serious repercussions for populations even outside of a wind energy array. The DEIS does not consider any of these relevant potential impacts for benthic species found within the lease area.	Section 3.2.2 of the FEIS has been updated for the assessment of the effect of hydrodynamic changes on larval transport. The results of the Chen et al. study with respect to larval transport are clarified in Section 3.3.2 of the FEIS.
0149-037	Evaluation of the impacts of the proposed action to ocean circulation patterns and water flow is particularly important given the location of the project area in the region of the Cold Pool. The Cold Pool is a 20-60 meter thick band of cold, near-bottom water that persists from spring to fall over the mid and outer shelf of the Mid-Atlantic Bight and the southern portion of Georges Bank. It is a geographic rarity and drives much of the productivity of a large portion of the Northeast Shelf Large Marine Ecosystem. The Cold Pool’s uniqueness derives from a very low level of mixing and a highly stratified thermocline. The DEIS fails to consider impacts to the Cold Pool, resultant impacts to fisheries resources, and any other regional or local oceanographic effects that will arise from the installation of turbines, which are likely to increase mixing throughout the water column.	Appendix E of the FEIS has been updated to include additional information related to atmospheric and oceanographic effects of offshore wind facilities. Please see Sections E.2.6 and E.4.4 of Appendix E of the FEIS. A revised Section 3.3.2 of the FEIS mentions that WTGs could affect mixing and the thermocline, but this would not likely have a significant effect on either the cold pool or on surface water temperatures; therefore, this potential consequence would likely have little effect on fish.

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0149-038	Research on Wind Energy Removal: In addition to mixing effects anticipated with the installation of massive fixed structures, other impacts are likely to result from atmospheric changes associated with large-scale offshore wind energy development. Wind energy facilities are designed to efficiently remove or harvest wind energy from the ecosystem, which may change underwater conditions based on reduced shear effect at the surface of the ocean. The DEIS does not address any potential environmental impact of removing energy from this atmospheric boundary layer, nor acknowledge that available information is very limited regarding the overall ecosystem shifts that may result from the combination of atmospheric and hydrographic changes.	Appendix E of the FEIS has been updated to include additional information related to atmospheric and oceanographic effects of offshore wind facilities. Please see Sections E.2.6 and E.4.4 of Appendix E of the FEIS.
0149-039	While understanding and measuring large-scale climatic fluctuations is difficult, RODA would like to express concern with the lack of scientific research conducted on the impacts turbines will have on prevailing surface wind and atmospheric conditions. Numerous scientists and fishermen alike have expressed concern on the potential for these expansive wind farms to extract energy from ocean winds, which are responsible for many ecological processes unique to the region. We encourage BOEM and Vineyard Wind to support scientific studies to help better understand how these projects will affect the entire ecosystem.	Appendix E of the FEIS has been updated to include additional information related to atmospheric and oceanographic effects of offshore wind facilities. Please see Sections E.2.6 and E.4.4 of Appendix E of the FEIS. Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. Additional mitigation and monitoring measures may arise from consultations and coordination with Federal and State resource agencies. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision. Long-term monitoring is included in Appendix D, which can be selected by the decision maker.
0149-040	The Predicted “Reef Effect” Is Highly Speculative and Poorly Supported in the DEIS: The DEIS makes a sweeping statement that the proposed project will have a “[m]oderate beneficial long-term reef effect from piles and scour protection.” This proclamation is not supported by any evidence or facts. In fact, the only study cited in the DEIS specific to a potential reef effect in any reasonable geographic proximity to the lease area is one conducted by the Minerals Management Service in 2009; that study concluded that the Cape Wind Energy Project would not create such an effect. It also notes that although a so-called reef effect has been observed around existing turbines in Europe, “benefits to fish and invertebrates [of such an effect] are inconclusive.” It is therefore entirely unclear upon what information BOEM bases its positive conclusions in the DEIS.	Sections 3.1.2, 3.2.2, and 3.3.2 of the FEIS have been updated to consider potential reef effect from cable protection and scour protection and cite a 2018 study by Causon and Gill, English et al. 2017, and HDR 2019.
0149-041	Notably, the DEIS is also internally inconsistent in finding a “moderate beneficial” impact despite the qualifier that “impacts on a population level for most species should be minimal,” when elsewhere in the document biological impacts to fish are deemed “minor” or “negligible” due to the limited affected geographic area compared to the population range as a whole.	Section 3.2.2 of the FEIS explains how an increase in rare hard bottom habitat would be more impactful than an equal decrease in abundant habitat. Furthermore, the FEIS has been reviewed to ensure consistency in terms.
0149-042	The supposition of beneficial impacts of a “reef effect” is particularly problematic in light of the DEIS’s absence of analysis on a holistic, ecosystem basis.	Section 3.1.2 of the FEIS considers potential reef effects from cable protection and scour protection and cites a 2018 study by Causon and Gill, English et al.

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	Ecosystem engineering is not necessarily a desirable process and should not be described so simplistically. One major consideration is that even if a “reef effect” did have the outcome of increased biomass compared to the original bottom structure, artificial habitats differ substantially in species composition from the habitat they replace. Much evidence shows that artificial habitats—both marine and terrestrial—can also become hotspots for invasive species or reduce species richness.	2017, and HDR 2019. The limited conversion of soft bottom habitat to hard bottom is not anticipated to have any ecosystem level effects, especially given the abundance of hard bottom within and adjacent to the OECC. The FEIS, Sections 3.1.2, 3.2.2, and 3.3.2, have been updated to explain potential benefits and caveats of the reef effect and acknowledge the possibility of infestation by invasive species.
0149-043	Predicting changes in ecosystem composition resulting from habitat alteration is a highly location-specific exercise, and neither the COP nor the DEIS contains informed analysis as to what the expected outcomes of habitat alteration could be at this particular site. One example of special concern to the fishing industry is the possibility of increases in undesirable species such as the non-native European green crab.	Sections 3.1.2, 3.2.2, and 3.3.2 of the FEIS have been revised to explain potential benefits and caveats of the reef effect and acknowledge the possibility of infestation by invasive species.
0149-044	Moreover, research has shown that wind energy facilities in Europe attract seals and may in fact increase their populations. (Russell, D. J., Brasseur, S. M., Thompson, D., Hastie, G. D., Janik, V. M., Aarts, G., McClintock, B. T., Mattiopoulos, J., Moss, S. E. W. & McConnell, B. (2014). Marine mammals trace anthropogenic structures at sea. <i>Current Biology</i> , 24(14), R638-R639.) Seal populations are already rapidly increasing in New England—with the harbor seal population more than tripling and grey seals more than doubling in roughly the last decade alone—and are a significant source of predation on severely depleted Atlantic cod and other important fishery stocks. Their growth in numbers has also fueled the increase in great white sharks in New England waters, which has had positive and negative impacts in its own right.	Section 3.4 of the FEIS has been revised to describe the potential effect of the proposed Project on seals, including reference to the Russell et al. (2014) and (2016) studies.
0149-045	Finally, the DEIS provides no information on an anticipated timeline for any “reef effect” to take place. It also fails to evaluate whether the creation of hard benthic structure would be expected to increase abundance of species with an affinity to that substrate, or whether it would simply aggregate existing populations. If the latter, a “reef effect” could in fact have additional impacts to fishery catches that are not addressed in the DEIS.	The artificial reef effect is anticipated to occur rapidly and be established within 1-2 years (English et al. 2017). Although some studies have noted increased biomass and increased production of particulate organic matter by epifauna growing on submerged foundations, it is not clear to what extent the reef effect results in increased productivity versus simply attracting and aggregating fish from the surrounding areas (Causon and Gill 2018). Sections 3.1.2, 3.2.2, and 3.3.2 of the FEIS contain a revised description of potential reef effects including a time frame and new citations.
0149-046	Habitat Impacts: The DEIS oversimplifies ecosystem dynamics by concluding that hard-bottom fish stocks will increase after wind energy facility construction due to increased benthic structure such as scour protection, and soft-bottom stocks will decrease. This implies fishery stock dynamics are based purely on the amount of suitable habitat type. In fact, the drivers behind stock abundance and species richness are extremely complex. In general, the habitat impacts analysis	Section 3.3.2 of the FEIS has been updated to include a discussion of habitat-related impacts, including temporary and long-term habitat loss, as well as water quality effects including turbidity and sediment deposition. Further detailed information on these topics is also provided in the EFH Assessment, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ . Appendix A of the FEIS has been updated with

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	in this DEIS and those for future lease sites should be far more rigorous, including consideration (and differentiation, where applicable) of any relevant information known from studies of European wind energy facilities. The lack of information in the DEIS and the overall high level of scientific uncertainty regarding these issues further highlight the need for both adaptive implementation and monitoring to better understand impacts to individual fish stocks, and cumulative effects modeling to show how all the elements referenced in the DEIS interact to impact fishery resources.	additional information regarding reasonably foreseeable future offshore wind projects considered in the analysis, and 3.3 for discussion of impacts on EFH.
0149-047	There Is No Evidence to Support Claims of Positive “Sanctuary Effects”: The DEIS states: “If the access to fishing locations is reduced, an artificial ‘sanctuary’ for fish can also develop,” implying that this is a desirable outcome, without further explanation. In reality, the available research on the benefits of fisheries closures in temperate areas generally—and in New England specifically—do not support this assertion.	Section 3.10.2 of the FEIS has been revised to include additional information on reef effect. Access by small fishing boats will not be restricted, so the reference to a “sanctuary” has been removed.
0149-048	The DEIS also fails to provide a definition of what BOEM considers to be a “sanctuary effect.” For the purpose of these comments, we assume it implies commonly-discussed beneficial outcomes from certain marine protected areas (especially in tropical areas) such as enhanced biomass, recovery of depleted fishery stocks, increased ecosystem productivity, and the like.	Section 3.10.2 of the FEIS has been revised to include additional information on reef effect. Access by small fishing boats will not be restricted, so the reference to a “sanctuary” has been removed.
0149-049	[a key finding of]the New England Fishery Management Council [was] was that the best way to protect vulnerable habitat and fish stocks that rely on that habitat is to maximize catch per unit effort. That is, encouraging fishing in locations with the greatest concentration of target stocks (and relatively low concentrations of bycatch) provides greater net benefits to fisheries than does closing large areas to fishing. Moreover, a 2006 study by NMFS scientists compared scallop stock dynamics in areas inside and outside of the then-existing closed areas on Georges Bank, which are near the WDA and other sites proposed for lease development. That study found that long-term mean scallop recruitment was the same inside groundfish closures and in open areas. In addition, studies from the University of Massachusetts at Dartmouth’s School for Marine Science and Technology have shown no difference in epibenthic community productivity between areas that are open and closed to scallop fishing. Epibenthic community surveys in Closed Areas I and II showed that changes in number of fish and macroinvertebrate categories, and the density of individuals within each category, were similar in areas open to a short-term scallop fishery and in the control areas that were closed to fishing.	Thank you for your comment.
0149-050	Not only can “sanctuaries” fail to provide the hoped-for benefits of increased productivity, but poorly-planned displacement of fishing effort can have strongly negative biological impacts. Elsewhere in the DEIS, it states that fishermen may	Section 3.10.2 of the FEIS has been revised to include additional information on reef effect.

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	<p>choose to avoid fishing in proximity to wind energy facilities, in which case: “[T]hey may relocate to other fishing locations and continue to earn revenue. However, this could cause increased conflict in those locations, and vessels may incur increased operating costs (e.g., additional fuel to arrive at more distant locations) and lower revenue (e.g., less productive area; less valuable species).” This recurring prediction oversimplifies the ability of fishermen to simply move their operations to another area. Moreover, it is well-documented that assumptions about the spatial distribution of fishing effort before and after the implementation of a closure, if those assumptions do not take economic factors into effect, generally overstate the beneficial effects of closures and severely bias the predicted outcome.</p>	
0149-051	<p>In short, the assumption that closing certain areas to fishing will necessarily entail positive impacts to fisheries and benthic ecosystems is, at best, misleading. RODA is skeptical that wind energy facilities offshore New England will have a “sanctuary effect” at all; in order for BOEM to assert that they will, it must support its position with geographically-relevant ecological and economic studies and other information.</p>	<p>Section 3.10.2 of the FEIS has been revised to include additional information on reef effect. Access by small fishing boats will not be restricted, so the reference to a “sanctuary” has been removed.</p>
0149-052	<p>Temperature: ...the DEIS contains no actual analysis whatsoever of the potential impacts of those changes to the temperature of water or sediment resulting from heat emissions emanating from the inter-array or transmission cables... the 2012 Guidelines on Best Environmental Practice (BEP) in Cable Laying and Operation... noted that buried power cables lead to a significant rise in temperature of the surrounding sediment, stating that “[t]here is the potential that a long-lasting increase of the seabed temperature may lead to changes in physiology, reproduction or mortality of certain benthic species and possibly to subsequent alteration of benthic communities due to emigration or immigration” as well as changes in bacterial activity leading to potential secondary impacts to benthic flora and fauna. RODA requests that BOEM fully evaluate the extent of known information regarding temperature impacts of subsea cables, support future research to further understand how heat emissions affect fishery resources and ecosystems, and require any necessary mitigation measures (such as increased cable burial depths) to avoid these impacts.</p>	<p>Sections 3.2.1 and 3.2.2 of the FEIS have been updated to address heat effects for the cable.</p>
0149-053	<p>Electromagnetic Fields: The DEIS also contains very little information about the impacts to fishery stocks from electromagnetic fields, and further species-specific analyses should be conducted in order to understand how cables would affect the organisms in the project area. Studies have shown changes in behavior in response to EMF, particularly for elasmobranchs. Altering behavior of any organism should warrant additional investigation and should not be considered a “minor” impact, moreover impacts to species with high trophic positions will likely cascade throughout an entire ecosystem and thus should be analyzed in</p>	<p>Section 3.3.2 of the FEIS has been revised the discussion of EMF-related impacts on fish.</p>

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	depth. Furthermore, EMFs acting as “barriers” to a particular habitat is not the only concern for exposure to these electromagnetic fields. Influences on predation, mating, and navigation are equally important and impacts of EMF on behavior should be analyzed holistically, not just if the fields repel an organism from an area.	
0149-054	Scour and Other Benthic Alterations: The proposed action would have significant impacts to benthic structure due to the installation of scour protection around the turbine bases. However, the DEIS lacks any description of what type of scour protection would be used or how the materials, amounts, or installation method would be determined (the same is also true for cable mattresses or other protection). These details will significantly influence impacts to benthic communities due to habitat alteration and changes in suspended sediment and water quality. BOEM should properly describe and analyze the relevant parameters and only approve scour protection methods that are least impactful to fishery resources.	The FEIS includes a description of scour protection in Section 3.2.2. The FEIS has been updated to include a list of potential types of cable protection in Sections 3.1.2 and 3.2.2. In addition, the potential location of cable protection, including a pending cable burial risk assessment and report by Vineyard Wind, is discussed in Sections 3.1.2 and 3.2.2 of the FEIS.
0149-055	Social Impacts: [social impacts including] increased time away from family due to longer and displaced fishing trips, disparate impacts to low-income communities, and loss of historical knowledge and cultural practices [may exist]. We hope that these issues will be addressed prior to approval of construction and installation permits as required by NEPA.	Sections 3.6.1 and 3.6.2 of the FEIS have been updated to include information on community identity related to fishing industry and Section 3.6.2 has been updated for possible “Ocean & Fisheries and Wind Fund” that could assist in fishery technology. The DEIS addressed impacts on low-income communities in Section 3.3.2.
0149-056	Additionally, the current DEIS does not address the potential loss in a qualified workforce for fishing companies if crew members are hired by wind developers. If local hiring mitigation measures outlined in Chapter 2 are included in the final COP, shifts in skilled workers from the fishing industry to wind development would limit the availability of experienced and skilled individuals. The fishing industry is dependent on a skilled workforce and careful consideration should be implemented in any local hiring mitigation plans.	Section 3.6.2 of the FEIS has been updated to include information on potential competition for workers.
0149-057	Economic Impacts: RODA believes that, overall, there has not been an adequate study regarding the true economic impacts of offshore wind energy development (whether project-specific or regionally) to Atlantic fisheries... Needless to say, we therefore strongly disagree with the conclusions of the private and even more simplistic economic study Vineyard Wind presented to the RI CRMC in January 2019 concluding that realized fishery losses would be far less than those described by RI DEM.	Section 3.10.1 of the FEIS has been revised to include data from multiple sources, including: revenue intensity data (available publicly at https://www.boem.gov/Renewable-Energy-GIS-Data/); fishing revenue and landed pounds data by species, port, gear type, and state provided by NOAA; data from the addendum to “Spatiotemporal and economic Analysis of Vessel Monitoring System Data within Wind Energy Areas in the Greater North Atlantic” prepared by the RI DEM; as well as results from the “Rhode Island Fishing Value in the Vineyard Wind Construction and Operations Plans Area” also prepared by the RI DEM. Effect assessment in Sections 3.10.2 through 3.10.8 meets EIS requirements. Additionally, the EIS does not conclude that “realized fishery losses would be far less than those described by RI DEM.” In fact, it is acknowledged that it is challenging to quantify the impacts on

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		commercial and for-hire fisheries as there can be disruption to fishing in the WDA during project construction and installation, however, during operation and maintenance fishing in the WDA will continue, but possibly at a reduced rate as some fishermen may relocate to other fishing locations.
0149-058	We also understand that additional studies may have been commissioned by the developer that are currently considered confidential; if any relevant management decisions are based upon these studies they must be made fully public and available for review.	Thank you for your comment.
0149-059	As with several other sections of the DEIS and COP, there are substantial inconsistencies in the economics impacts analyses. For example, the statement that “[s]even different Fisheries Use and Management programs regulate commercial and recreational fisheries in and around the WDA in both state and federal waters” is inaccurate given the large number of federal and state Fishery Management Plans that control fishing activity in the project area.	Section 3.3 of the FEIS has been revised to better reflect the variety of fishery management plans and to consider the impact of regulated fishing effort on populations of finfish and invertebrates.
0149-060	Additionally...the implied ease of “relocating to other fishing locations” of the DEIS is irresponsible and unrealistic. For example, while the DEIS does discuss the potential increased transit time, it does not take into account economic loss for fisheries that are ‘on the clock’, such as scallops and monkfish, that will lose not only fishing time but also catch and revenue from fishing in alternative locations. There are a wide variety of management restrictions in each affected fishery that must be considered in determining the actual economic impacts of displacement. RODA therefore encourages BOEM to work with NMFS, the regional fishery management councils, and our members to develop a credible and comprehensive framework for analyzing the economic impacts of offshore wind energy development to fisheries.	Section 3.10.2 of the FEIS has been revised to include additional information on relocation of fishing. BOEM has incorporated additional data provided by NMFS into the revised Section 3.10 of the FEIS.
0149-061	Finally, the DEIS refers to a number of vessels permitted in the MA WEA and Vineyard Wind WLA that will lose the majority of their revenue if displaced out of the area during construction and installation. BOEM anticipates that compensation payments to affected fishermen will reduce impacts to “minor” during the construction disruption period. RODA strongly believes that simply buying off fishermen who have historically fished in the WEA is irresponsible and diminishes the loss of a profession to a “minor” impact. In order for offshore wind development to be sustainable and able to coexist with current ocean utilization, it is necessary that fishing practices and traditional fishing grounds be respected.	Fishing activities within the WDA might be impacted to the extent access to the WDA is restricted; fishing gear is entangled with protections placed over cables or around foundations of WTGs or ESPs; and/or maneuverability restrictions within the WDA result in the displacement of fishing vessels. Concerning vessel access to the WDA, it is worth mentioning that temporary limited or restricted access areas (safety zones) may be set up around active construction areas where applicable. However, note that BOEM does not have the authority to restrict access to the WDA during operations. In addition, the USCG has stated that they will not restrict access to the WDA during operations. The USCG’s authority to establish safety zones only extends to the boundary of the territorial waters of the United States, which is 12 nautical miles from shore and outside the WDA.

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		Section 3.10 of the FEIS has been updated to include details of mitigation and monitoring measures relative to commercial fisheries, including voluntary financial compensation. Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. Additional mitigation and monitoring measures may arise from consultations and coordination with Federal and State resource agencies. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0149-062	Importantly, it is also unclear in the DEIS what criteria BOEM will use to evaluate whether any proposed compensation payments are reasonable or sufficient and who would qualify as “affected fishermen” in order to achieve this predicted outcome of impact reduction.	Section 3.10 and Appendix D of the FEIS have been revised to include the Vineyard Wind’s voluntary established gear loss and revenue compensation funds for fishing interests based in Rhode Island, Massachusetts, and other states. Please see Section 3.10 and Appendix D of the FEIS for more details on the measures.
0149-063	Jobs: Due to the proposed Vineyard Wind project, in conjunction with additional offshore wind projects that will be constructed in the coming decade, fishing industry jobs will be lost as fishing grounds are impacted through numerous ecological, environmental, and accessibility factors... It is unknown at this time how many fishery related jobs will be lost as a direct result of the proposed action, but as currently stated in the DEIS, the offset of jobs created does not come close to the number of jobs the fishing industry currently provides to the community.	Thank you for your comment.
0149-064	Currently, the DEIS only addresses the potential creation of jobs in Massachusetts. We request the final EIS to include any positions that the Proposed Action would generate outside of Massachusetts, as the current development plan states that approximately 35 to 55 percent of jobs will be sourced within the United States. If these jobs are for the majority employing individuals outside of MA or New England, additional mitigation should be considered as this development action will cause MA and New England based fishermen and associated fishing industry employees to go out of business. In short, the creation of offshore wind jobs may not be sufficient to offset localized loss of employment.	Section 3.6.1 of the FEIS has been updated to include information for ocean economy employment data and additional explanation of Vineyard Wind job generation figures. Impacts on the commercial fishing industry are evaluated in Section 3.10 of the FEIS but the impact has been restated in Section 3.6.2 of the FEIS.
0149-065	Cumulative Impacts: The DEIS fails to adequately evaluate two distinct types of cumulative impacts: (1) the combined impacts of multiple factors to fishery resources; and (2) the impacts of the development of multiple wind energy facilities across the 1400 sq. nautical mile New England lease area complex. It also misrepresents the predicted impacts to fishery resources associated with climate change.	Appendix A of the FEIS has updated the information regarding reasonably foreseeable future actions considered in the analysis, and Section 3.10 of the FEIS for discussion of impacts on commercial fisheries.
0149-066	Compounding Impacts from Multiple Disturbances: Entirely absent from the DEIS is any consideration of how multiple impact factors may work together to	Appendix A of the FEIS has updated the information regarding reasonably foreseeable future actions considered in the analysis, Section 3.10 for discussion

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	<p>exponentially impact fish and fisheries on an individual stock or ecosystem basis. For example, how might survivability of a given population or sub-population be affected by changes in water column sedimentation, currents, temperature, substrate change, etc., that occur concurrently, versus any one of these changes in isolation? This is a critical omission from the DEIS. BOEM must make every possible effort to characterize these cumulative impacts, which is one of the core requirements of NEPA. Where insufficient information is available to inform predictions, that must be clearly stated and considered as a high priority area for future research.</p>	<p>of impacts on commercial fisheries, Section 3.3 for discussion of impacts of EFH, and other resource sections for resource-specific impacts discussions. Appendix H of the FEIS includes a discussion on Incomplete or Unavailable Information for each resource.</p>
0149-067	<p>Cumulative Impacts of Large-Scale Offshore Wind Energy Development: As many fishing industry members have expressed before, we remain concerned that BOEM continues to take the view that an offshore wind energy facility does not need to be analyzed for conflicts with other ocean uses until it is in the very late stages of development. While an agency has some discretion in what it considers a “foreseeable future action,” The Department of Interior’s own NEPA regulations define such actions as those that are: “[S]ufficiently likely to occur, that a Responsible Official of ordinary prudence would take such activities into account in reaching a decision. These [activities include those] for which there are existing decisions, funding, or proposals.” The regulations further exclude from this definition only those actions that are “highly speculative or indefinite” (emphasis added). A project does not have to be certain, highly likely, or have all its details finely planned-out in order to be reasonably foreseeable. Given the huge amount of money spent on the most recent lease sales, and the significant costs incurred by survey and other work on neighboring lease sites, it is certainly reasonable to expect that there will be additional wind energy facilities other than the South Fork project near the Vineyard Wind WDA. At a minimum, one could reasonably assume that the future projects may have similar Project Design Envelopes and/or similar environmental impacts to those of the proposed action, and BOEM could evaluate them accordingly with regard to the range of possible cumulative impacts.</p>	<p>BOEM has revised the list of reasonably foreseeable future offshore wind projects based on project progress since publication of the DEIS, and this information was included in the SEIS and carried forward to the FEIS. The list of reasonably foreseeable future offshore wind projects is included in Appendix A of the FEIS. The assessment of effects from reasonably foreseeable actions as presented in the SEIS was carried forward to the FEIS and updated where appropriate.</p>
0149-068	<p>RODA is especially concerned that the current process will never include a full consideration of the collective impacts to fisheries from the build-out of the entire area. When would this full analysis occur? The Council on Environmental Quality issued guidance to federal agencies with direct relevance to this issue, suggesting that an area-wide EIS may be appropriate in this situation: “For example, when a variety of energy projects may be located in a single watershed, or when a series of new energy technologies may be developed through federal funding, the overview or area-wide EIS would serve as a valuable and necessary analysis of the affected environment and the potential cumulative impacts of the reasonably foreseeable actions under that program or within that geographical</p>	<p>BOEM has revised the list of reasonably foreseeable future offshore wind projects based on project progress since publication of the DEIS, and this information was included in the SEIS and carried forward to the FEIS. The list of reasonably foreseeable future offshore wind projects is included in Appendix A of the FEIS. The assessment of effects from reasonably foreseeable actions as presented in the SEIS was carried forward to the FEIS and updated where appropriate.</p>

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	<p>area... the overview EIS would be prepared for all of the energy activities reasonably foreseeable in a particular geographic area or resulting from a particular development program. This impact statement would be followed by site-specific or project-specific EISs. The tiering process would make each EIS of greater use and meaning to the public as the plan or program develops, without duplication of the analysis prepared for the previous impact statement.” Although BOEM conducted a Programmatic EIS in 2007 related very generally to the development of offshore alternative energy in the United States, RODA submits that that document was glaringly inadequate and erroneous in its treatment of fisheries impacts, and it provided no details that would inform analysis of the impacts of offshore wind energy development in the New England region. We once again urge BOEM, ideally in advance of its decision on the proposed action but at least before future projects are designed, to undertake a full evaluation of the impacts of building what is likely to be the world’s largest offshore wind energy program to the region’s highly productive and sustainable fisheries.</p>	
0149-069	<p>Climate Change: Despite the large amount of unknown information, a wide body of scientific studies does exist that informs predictions and fishery management practices to the greatest extent possible. BOEM cites none of this literature to support its sweeping conclusions that not only does it “not anticipate the Proposed Action would make any measurable contribution to those cumulative effects” but, incredibly, “the Proposed Action could ameliorate these effects, although its contribution would be negligible.” It fails to even define to what “effects” it refers, which makes it difficult to submit an informed comment to this end. This conclusion appears to indicate that BOEM simply considers all impacts associated with climate change to be negative, and all activities to reduce carbon emissions to be positive. In reality, while reducing carbon emissions is an important societal goal, an honest inquiry into the best available science would show that climate change has been predicted to actually increase numerical density and growth rates of Northwest Atlantic fish stocks overall. While the effects are certain to be of vastly different direction and magnitude on individual stocks, fisheries, and spatial scales, this is a scientifically complex topic that the DEIS does not evaluate—nor does it predict any anticipated reduction in the amount or pace of climate change on any spatial scale resulting from the Vineyard Wind project (or any other offshore wind energy project).</p>	<p>Section 3.3 of the FEIS clarifies that the Project’s effect on climate change would not likely make any measureable contribution to impacts on fish. Note that this document does not analyze potential effects on individual fish stocks, because an assessment of species-specific or stock-specific effects is outside of the scope of this document.</p>
0149-070	<p>RODA strongly disagrees with the approach Vineyard Wind has taken to addressing the mitigation of impacts to fishing activities and resources, which is partially reflected in the DEIS but has primarily been approached through concurrent state-based methods that have been poorly integrated into the federal approval process. As we have expressed in the past, we believe that the development of a common framework for such “mitigation” must be done in a</p>	<p>Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.</p>

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	transparent, holistic, and well-structured manner that includes impacts from the wide variety of affected fishing businesses. Moreover, an appropriate mitigation plan must follow the principles of first avoiding conflicts, then minimizing those that are unavoidable, mitigating the impacts from new development through appropriate use of communications and technology, and finally—only once those have been adhered to—considering compensation for any residual losses.	
0149-071	While several sections of the DEIS propose mitigation measures to offset impacts to traditional and historic fishing practices, too much emphasis is placed on monetary compensation. (And even so, as noted above, the DEIS fails to require any specific process, amounts, or even guidelines for working with the fishing industry to determine whether monetary compensation is fair and fact-based, which is an important federal role for a large infrastructure project in federal waters.) Given the rapid pace and large scale of proposed offshore wind energy development in the region surrounding the WDA, and the U.S. Atlantic Ocean EEZ more generally, it is the federal government’s duty to hold developers to standards that seek to maximize the operational compatibility of their projects with commercial fishing—particularly since the DEIS “anticipates that the use of compensation payments to affected fishermen would reduce impacts to minor to moderate.” (Section 3.4.5.3). For more information on RODA’s position regarding fisheries mitigation, please see the appended letter we submitted to Vineyard Wind on December 18, 2018.	Section 3.10 and Appendix D of the FEIS have been revised to include the Vineyard Wind’s voluntary established gear loss and revenue compensation funds for fishing interests based in Rhode Island, Massachusetts, and other states. Please see Section 3.10 and Appendix D of the FEIS for more details on the measures.
0149-072	RODA continues to believe that an appropriate fisheries mitigation plan can be developed despite imminent project deadlines and without delaying project approvals and that it is within the federal government’s purview to coordinate such an approach. The New York Public Service Commission, for example, took a similar approach in its “Order Establishing Offshore Wind Standard and Framework for Phase 1 Procurement,” which requires would-be bidders to “submit a fisheries mitigation plan, with a degree of specificity to be identified by NYSERDA in the bid solicitation, which may also include any best practices established by the Technical Working Group as of the time of the solicitation.” By providing this placeholder language, NY was able to move forward with its procurement process despite not having a conclusive mitigation framework in place, so that best practices could be developed with full input from the industry on an appropriate timeline.	Thank you for your comment.
0149-073	Finally, RODA submits that principles for effective fisheries mitigation should be approached at a regional scale and not limited to near-shore fishing communities or residents of only particular states. Fishery stocks shift in time and place, and it is therefore inappropriate to base any mitigation plan on a short time series or limited geographic scope when more comprehensive input can be considered and impacts more precisely modeled if the time is only taken to do so. Federally-	Thank you for your comment.

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	permitted fishermen are authorized to fish in federal waters and must be treated equally when addressing changes to their fishing practices both in the near- and long-term. To date, the Vineyard Wind project has not utilized this approach and RODA remains deeply alarmed at the possible precedent that may be set by this faulty process with regard to future wind energy project development. We therefore hereby reiterate our request to BOEM to exercise federal leadership on this critical matter and utilize all available flexibility in requesting all developers to develop regional and open mitigation strategies collaboratively with the fishing industry, in order to ensure fairness and long-term compatibility.	
0149-074	Regional Science and Monitoring: The DEIS contemplates requiring Vineyard Wind to contribute up to \$500,000 annually to a regional science monitoring program to determine impacts to fishing. RODA strongly supports this requirement, and further requests that the selected program be public, transparent, and inclusive of broad fishing industry input regarding study prioritization and design. As you may know, we have been working collaboratively with offshore wind developers as well as federal and state agencies toward a regional model for coordinating this body of research and hope that Vineyard Wind will join us in establishing this framework, which we expect to be before the FEIS is completed. While we strongly urge Vineyard Wind (and all offshore wind energy leaseholders) to join in this effort, we do not feel that the simple act of monitoring the impacts of a project should be characterized as “mitigation,” as it is in the DEIS. Rather, it is in the public interest to efficiently and effectively gather as much information as possible about our offshore ecosystems in order to inform planning and management. This may inform the mitigation of impacts for future projects (including Vineyard Wind’s newest lease area in New England), but in and of itself is less likely to do so for the projects with near-term anticipated construction dates. In order to view a developer’s participation in a regional research effort as true “mitigation,” BOEM should consider how it would address project modifications that may become necessary if monitoring results indicate that impacts exceed an acceptable threshold.	Thank you for your comment.
0149-075	Dynamic Squid Avoidance Plan: The DEIS proposes the Dynamic Squid Fishing Avoidance Plan as a mitigation measure during the construction phase of the project. Currently, the squid industry does not have a dedicated representative to communicate such information to relevant fishing vessels. To require daily communication with cable vessel operators would require individual conversations with multiple vessels in the region. RODA does not believe that this would be a realistic or effective way to mitigate impacts to the squid fishery during cable-laying.	Thank you for your comment.
0149-076	RODA believes that there are alternative mitigation measures that would significantly reduce the impact of the proposed project to the squid fisheries in the	Section 3.10.1 of the FEIS has been revised to include squid revenue/landings data for 2016. Appendix D of the FEIS has been revised to include an updated list

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	<p>region. Primarily, RODA recommends cable laying be conducted outside of the peak squid fishery seasons and periods of peak spawning (May through August). This measure may potentially radically reduce the interference with the biology of the squid life history, and would improve the project’s impact to the squid fisheries. Furthermore, in the draft COP, fishing revenue data from the 2016 fishing year is missing, pointing to incomplete data upon which compensation and mitigation measures have been assessed. We suggest that further analysis of data, per recommendations from the NMFS comment letter on this DEIS, should be conducted to ensure any mitigation and compensation is sufficient to the squid fishing industry.</p>	<p>of mitigation and monitoring measures. Vineyard Wind is developing a separate cable burial risk assessment.</p>
0149-077	<p>To minimize negative interactions between vessels, RODA recommends cable-laying vessels to file sail plans several days in advance prior to in-water construction. Sail plans detailing anticipated dates, time, location and course headings of vessel operations would enable the squid fishing fleet to improve cable vessel avoidance in situ. Furthermore, we believe that it would be pertinent for cable laying and construction vessels to have dedicated personnel on board to communicate with fishing vessels in the area should issues arise. This, along with a daily operations update broadcast, would enable the squid fishing fleet to be aware of potential issues based on short term cable vessel intentions.</p>	<p>Section 3.10.2 of the FEIS has been revised to provide additional information on cable burial and Vineyard Wind’s plans for communication and consultation with commercial fisheries interests. Vineyard Wind is preparing a separate cable burial risk assessment.</p>
0150-001	<p>[Green Energy Consumers Alliance writes] in support of the development of a Final Environmental Impact Statement for the proposed Vineyard Wind project; furthermore, we urge that the Final Environmental Impact Statement fully recognizes the long-term social and environmental benefits of this project that will result from this new source of clean, reliable electricity for the New England power grid.</p>	<p>Thank you for your comment.</p>
0150-002	<p>The Draft Environmental Impact Statement recognizes that the proposed Vineyard Wind project “would likely result in slowing of the climate change process” (DEIS 3-7), on top of the reduction of other air pollutants generated by traditional fossil fuel power plants. Although the climate change mitigation that will result from Vineyard Wind will likely have only a marginal impact on the area discussed in the Draft Environmental Impact Statement, the cumulative global impacts are important.</p>	<p>Thank you for your comment.</p>
0150-003	<p>Furthermore, as one of the first large-scale off-shore wind projects proposed in the United States, the successful and timely completion of the Vineyard Wind project is integral to widespread development of off-shore wind. This project will bring down the costs of future clean energy development for ratepayers across the United States. This project will result in climate change mitigation by displacing fossil fuel generation in New England, while also paving the way for many more off-shore wind projects in the years to come.</p>	<p>Thank you for your comment.</p>

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0150-004	Vineyard Wind has developed numerous additional strategies to reduce these minor and moderate impacts. The long-term benefits, which include climate change mitigation, reliable electricity delivery for the New England grid, and compliance with Massachusetts’ energy policy (DEIS 7-1), should be emphasized in the Final Environmental Impact Statement. The long-term benefits to the New England electricity grid are even more important in light of the changes forecasted in New England’s electricity grid over the coming decades ...The timely development of the Vineyard Wind project and the implementation of the proposed environmental impact mitigation strategies will be vital to New England’s environment and energy grid for decades to come.	Section 1.2 of the DEIS discussed the Purpose and Need for the proposed Project. The FEIS includes the beneficial impacts of the proposed Project in each resource-specific section in Chapter 3, as appropriate.
0151-001	I attended the meeting on the Vineyard’s Wind Project in Narragansett on February 15, and would like to add the following comments in support of the project based on an extensive study which I attached by URI’s School of Oceanography 2012. The following are some of the ways climate change has negatively impacted the ecology of local fish populations: Current PH on the surface of the ocean is significantly lower than the pre industrial levels, and also makes it conducive to invasive species like jellyfish, at the expense of crustaceans; Annual winter-spring cycle of phytoplankton is disrupted; [and] Increased temperatures effect abundance, and distribution of fish communities such as Atlantic Mackarel, Shad, Alewife, Lobster, & Winter Flounder.	Thank you for your comment.
0152-001	The Vineyard Wind development application lacks comprehensive environmental impact studies, monitoring and mitigation.	The FEIS has been revised based on public comments and other information received after publication of the DEIS.
0152-002	VW representatives were misleading at our Nov 11th presentation on Nantucket. This company should be denied all permits by our authorities.	Thank you for your comment.
0152-003	Offshore windfarms are presently unreliable and economically unfeasible to operate and maintain.	Thank you for your comment.
0152-004	Our natural resources, environment and marine life should not be slaughtered for such a folly. Please deny these applications and spend our resources on finding real solutions.	Thank you for your comment.
0153-001	Our two vehicle bridges (Sagamore and Bourne) are aging (built 1935) and wearing out quickly, yet we continue to run natural gas pipelines along them. For those unaware, natural gas is highly explosive. Adding a natural gas component to the canal power plant will demand that enforced safety measures are in place along the entire route of this greenhouse gas.	Thank you for your comment.
0153-002	Flooding is a reality on Cape Cod, with eroding sand dunes and beaches. The proposed location of the main Vineyard Wind substation is within a flood zone. In Oct 1978, the Sandy Neck Barrier Beach was designated as an “Area of Critical Environmental Concern” (ACEC). (Coincidentally, the Blizzard of ‘78	Section 3.2.2.3 of the DEIS (A.8.2 in the FEIS) included a discussion of the proposed substation and the proposed impervious containment sumps for dialectic fluids, as well as, additional substation components and measures to

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	wreaked havoc that winter, with widespread flooding.) The dune structure of Sandy Neck is changing, and there is great concern that this beach will be compromised; if so, the entire Barnstable Harbor will be at jeopardy. The currently proposed location for Vineyard Wind’s main substation will be at risk. https://www.mass.gov/files/documents/2016/08/qn/sn-des.pdf	minimize or avoid potential impacts on water quality in the event of a potential spill. Therefore, no change to the FEIS is warranted.
0153-003	Cape Cod and the Islands thrive on eco-tourism. Vineyard Wind proposes that thousands of jobs will be generated in the advent of offshore renewable wind energy. If anything goes wrong during the construction and operation of our country’s first major offshore wind farm, where the state of our natural environmental and marine quality is jeopardized, not only will existing jobs be compromised, but the jobs of generations to come will be obliterated.	Thank you for your comment.
0153-004	Cape Cod and the Islands thrive on fishing, both commercial and recreational. Many species, such as fluke, squid, tuna, striped bass, are migratory and use the corridor of Nantucket Sound to travel up the coast from North Carolina to Maine. The placement of 80+ wind turbine generators within the Sound will 100% disrupt migration, and thus the fishing activity of mobile and fixed gear. With that said, there needs to be well-established funds in place for the displacement of our fishing community.	Section 2.2.1, Section 3.3.6.3, and Appendix D of the DEIS included a discussion of monitoring and mitigation proposed for the Project. Section 3.3.2 of the FEIS has provided additional language for monitoring. Additional monitoring requirements and mitigation measures, if any, will be developed in coordination with the NMFS and included in the Record of Decision. Section 3.9.1 of the FEIS has updated the discussion of the importance of recreational fishing to economy.
0153-005	In the wake of nuclear energy’s demise at Pilgrim power plant, Massachusetts has the unique opportunity to fill the energy vacuum with clean, renewable resources. I support offshore wind energy, so long as it is done smartly and safely. I’ve read extensive articles regarding the harnessing of offshore wind energy in Europe. The U.S. has decades of catching up to do. Leading our country in the fight of cutting back greenhouse gas emissions, MA residents possess the utmost responsibility in seeing that it is done “smart from the start.”	Thank you for your comment.
0154-001	I have observed this company over the last several months, and have been impressed with their commitment to working collaboratively with various constituencies to resolve concerns. I believe we are now at the point where this project needs the approvals necessary to go forward. Science tells us, with ever increasing unanimity, that we have ten to twelve years to bring carbon emissions down, drastically. This project can be a major step in that direction.	Thank you for your comment.
0154-002	i hear and I’m sympathetic to local concerns, but in every case, run away climate change will exacerbate those concerns. I realize it takes some courage to rule in the face of local opposition, at whatever level it exists, but we need this project and others like it.	Thank you for your comment.
0155-001	The continued right whale sightings within the proposed wind turbine area is of concern. Vineyard Wind plans to discontinue construction if right whales are sighted during construction but what is the plan if their behavior is impacted after	Section 3.4.2 and Appendix D of the FEIS have been updated to include a discussion of monitoring and mitigation that has been proposed for the agency-preferred alternative relative to the North Atlantic right whale. Post-construction monitoring requirements are being developed with researchers, environmental

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	construction, it is too late? Appropriate pilot studies need to be conducted prior to construction.	<p>NGOs, State, and Federal agencies. Although long-term behavioral impacts are not expected to be major, the results of monitoring could be applied to adaptive requirements if the results show certain actions may be warranted.</p> <p>Section 3.4.2 of the FEIS has been revised in coordination with NMFS and includes the proposed mitigation and monitoring measures for marine mammals. Furthermore, Section 3.4 and Appendix D of the FEIS include the draft Incidental Harassment Authorization measures proposed to be issued under the MMPA.</p>
0155-002	The impact on behavior of right whales, pelagics and other species of concern that inhabit our waters resulting from change in habitat, ongoing erosion as well as the noise and EMF generated from hundreds of turbines and miles of electrical cable is unknown for the species of concern in our waters.	Sections 3.3 and 3.4 of the FEIS include a discussion on NARW and pelagic species.
0155-003	These fruitful productive fishing grounds to the recreational and the commercial fleet may be changed forever and could impact the migration and distribution of fish and marine mammals near shore and offshore. Appropriate pilot studies need to be conducted prior to construction.	Section 2.2.1, Section 3.3.6.3, and Appendix D of the DEIS included a discussion of monitoring and mitigation proposed for the Project. Section 3.3.2 of the FEIS has provided additional language for monitoring. All pre-construction monitoring requirements would be developed in coordination with the NMFS as part of the ESA Section 7 consultation.
0155-004	The RFA is a proponent of green energy but not to the detriment of our resource as well as when it proves to be economically feasible using only private equity, not rate payers or public funding sources. There is no doubt that the base of each proposed wind turbine unit serves as an artificial reef that attracts forage fish as well as gamefish.	Sections 3.1.2, 3.2.2, and 3.3.2 of the FEIS have been revised to include additional information on the potential reef effect from cable protection and scour protection and cite a 2018 study by Causon and Gill, among others.
0155-005	Our ongoing concerns are associated with the subsurface cable lines and associated EMF and noise generated from hundreds of wind turbine units and detrimental impact if any associated with such;...	To minimize EMF generated by cables, all cabling would be contained in grounded metallic shielding to prevent detectable direct electric fields. Vineyard Wind would also bury cables to a target burial depth of approximately 6.6 feet (2 meters) below the surface. Sections 3.2.2, 3.3.2, 3.4.2, and 3.5.2 of the FEIS have been updated to include additional information on EMF-related impacts on benthic resources, fish and invertebrates, marine mammals, and sea turtles, respectively. Sections 3.3.2, 3.4.2, and 3.5.2 of the FEIS have been updated to include additional information on operational noise impacts on fish and invertebrates, marine mammals, and sea turtles, respectively.
0155-006	Our ongoing concerns are associated with...impact to radar and/or safe navigation;	Section 3.4.7.3 of the DEIS included a discussion of impacts on radar and associated mitigation measures; therefore, no changes to the FEIS are warranted. Section 3.11.2 of the FEIS has been updated with an expanded discussion of impacts on navigation.
0155-007	Our ongoing concerns are associated with...and the potential for the proposed wind turbine areas to be shut down prohibiting access in the future.	Temporary limited or restricted access areas (safety zones) may be set up around active construction areas where applicable. However, note that BOEM does not have the authority to restrict access to the WDA during operations. In addition, the USCG has stated that they will not restrict access to the WDA during

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		operations. The USCG’s authority to establish safety zones only extends to the boundary of the territorial waters of the United States, which is 12 nautical miles from shore and outside the WDA. No change to the DEIS was necessary. Sections 3.9.1 and 3.9.2 of the FEIS have been updated to include additional discussion of impacts on recreational fishing for large pelagic species.
0155-008	Proposed subsurface cable lines are subject to ongoing erosion of the ocean floor sediment resulting in the lack of an adequate buffer to prevent impacts resulting from EMF exposure. Adequate buffer must be maintained to prevent detrimental impacts to the entire ecosystem. EMF could deter or attract crustaceans, forage fish, groundfish, finfish, highly migratory pelagic species (tuna, marlin, sharks) and marine mammals. Recreational anglers, charter boat captains and the commercial fleet are reporting such observations at the cable locations associated with the Block Island Wind Turbines that are now devoid of fish where fish were historically located in the past. Is the EMF associated with subsurface cable resulting in such behavior?	To minimize EMF generated by cables, all cabling would be contained in grounded metallic shielding to prevent detectable direct electric fields. Vineyard Wind would also bury cables to a target burial depth of approximately 6.6 feet (2 meters) below the surface. Section 3.2, 3.3, 3.4, and 3.5 of the FEIS have been updated to include additional information on EMF-related impacts on benthic resources, fish and invertebrates, marine mammals, and sea turtles, respectively. Further discussion of EMF-related impacts on these species is also provided in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ . There is no information available on observed effects of EMF from Block Island Wind Farm on fish.
0155-009	Fisherman also report observations of whales and marine mammals that have not been observed for 50 plus years in the Block Island Wind Turbine area until the units were constructed and up and running. Is the noise generated from the wind turbine units or EMF impacting their behavior?	Section 3.4.2 of the FEIS has updated the discussion of acoustic and EMF-related impacts on marine mammals. Further details regarding acoustic and EMF-related effects to these species are provided in Appendix F of the FEIS and in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ .
0155-010	Claisse et al. (2015) determined six out of 99 Hawaiian fish species exhibited some degree of direct evidence for magneto-sensitivity associated with subsurface cables; the six species included five sharks and the yellowfin tuna. Yellowfin tuna, bluefin tuna and sharks are located in the proposed wind turbine areas.	Section 3.3.2 of the FEIS has updated the discussion of EMF-related impacts on fish, with additional information on EMF-sensitive species. Claisse et al 2015 (https://www.boem.gov/2015-042/) is a BOEM literature synthesis identifying Hawaiian fish species that may be sensitive to EMF. It is well documented that shark species are sensitive to EMF, which is why BOEM conducted a controlled study over the Cross Sound Cable to more closely look at shark species behavioral changes in the presence of an energized cable. The FEIS has been updated to discuss the results of that study. Regarding yellowfin tuna, Claisse et al. referenced a previous study that found that yellowfin tuna could be trained in a controlled setting to respond to magnetic field anomalies. This study further found that “The delay in response caused by subsequent presentation of the anomaly decreased rapidly for all but one fish tested, suggesting that at first the fish were disturbed by the stimulus but later they paid no attention to it. (from Walker J Comp Physiol A (1984) 155:673-679)” These findings support the conclusion in the FEIS.

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0155-011	Adequate buffer must be maintained and associated scientifically valid and credible studies conducted to address [concerns about potential impacts of EMF from the proposed action].	To minimize EMF generated by cables, all cabling would be contained in grounded metallic shielding to prevent detectable direct electric fields. Vineyard Wind would also bury cables to a target burial depth of approximately 6.6 feet (2 meters) below the surface. Section 3.2.2, 3.3.2, 3.4.2, and 3.5.2 of the FEIS have been updated to include additional information on EMF-related impacts to benthic resources, fish and invertebrates, marine mammals, and sea turtles, respectively. Further discussion of EMF-related impacts on these species is also provided in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ .
0155-012	The figures attached at Attachment A indicate that the proposed wind turbines are located in critically endangered right whale areas, cod and herring spawning areas and squid mop areas. Considering the status of the critically endangered right whale population and the fact that the proposed wind turbines are located within spawning areas and fruitful fishing grounds for the recreational and commercial fleet we request that the following be addressed: What is the impact to these species as well as highly migratory pelagic species resulting from the EMF generated from the subsurface cable lines and the noise generated from hundreds of wind turbine units? Will the EMF or noise impact the ability for marine mammals or other species to navigate these waters or have a detrimental impact on their behavior? Will the EMF or noise generated from the units have a detrimental impact on grunting cod that are spawning in these areas as well as spawning herring and squid mops?	Sections 3.3.2, 3.4.2, and 3.10.2 of the FEIS have updated the discussions of anticipated impacts on fish and invertebrates (including highly migratory species), marine mammals, and commercial fisheries, respectively. Further discussion of ESA listed species is provided in the Biological Assessment submitted to NOAA. Further discussion of commercial fish is provided in the Essential Fish Habitat (EFH) assessment. Both documents can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ Note that the wind turbines would not be located in North Atlantic Right Whale Critical Habitat.
0155-013	The proposed wind turbines are located within an area known as “Gordons Gully” that we have identified more than once as being located in an area utilized by the recreational anglers as well as the commercial fleet. Recreational anglers including the charter boat and/or for hire fleet target, bluefin tuna, yellowfin tuna, white marlin, mahi and other species within and near Gordons Gully. The wind turbines need to be moved north or south beyond these key fishing grounds or the grid spacing of the wind turbines increased otherwise anglers will not enter these areas without the fear of losing hook and line gear if hooking into a large pelagic. Ultimately, anglers would be denied access to these key fishing grounds if the present wind turbine grid configuration remains since anglers would not enter this area due to safety concerns as well as potential fear of loss of hook and line gear while targeting highly migratory large pelagics.	BOEM does not have the authority to restrict access to or within the WDA during operations. In addition, the USCG has stated that they do not intend to restrict access to the WDA during operations. The for-hire recreational fishery has identified Gordon’s Gully, located in the southern part of the WDA, as an area that construction and installation activities may particularly impact. Trolling for highly migratory fish may involve many feet of lines and hooks behind the vessel and then following large pelagic fish once they are hooked. If the fishing is good in the area, then several vessels may be involved in the fishery. Given the navigational and maneuverability challenges under normal circumstances it is expected that this type of fishing may be further constrained where it overlaps with construction and installation activities. For-hire fishing boats are typically smaller compared to commercial fishing boats, which improves their maneuverability; however, construction traffic and noise can cause fish to leave the area. Therefore, it is expected that for-hire fishing would have more flexibility for use of the area during construction and installation. There is the potential, however, for behavioral impact on target recreational species as described above (Michael Pierdinock, Pers. Comm., September 19, 2018; FAO 2018).

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		Vineyard Wind’s supplemental navigational risk assessment shows that it is technically feasible to navigate and maneuver fishing vessels and mobile gear through the WDA, BOEM is cognizant that maneuverability within the WDA may vary depending on many factors including vessel size, fishing gear or method used, and or by environmental conditions. In addition, BOEM is aware that even when feasible to fish within the WDA, some fishermen might still not consider it safe to do so. However, BOEM also expects that, with time, many fishermen would adapt to WTGs spacing and would be able to fish successfully in the WDA.
0155-014	Recreational hook and line anglers targeting large pelagics such as makos, threshers, bluefin tuna, etc., will need to safely navigate around the base of the wind turbine structure(s) to avoid our gear being chaffed or tangled if one were to hook into a ballistic monster mako or bluefin tuna? So how far should each wind turbine unit be placed or what is the appropriate distance between each unit so we can safely navigate and land pelagics in the turbine areas? A scientific credible study assessing the adequate and safe distance to land pelagics is lacking and is absolutely necessary, reasonable and appropriate in order to sight the units.	Section 3.10.2 of the FEIS has been updated to include additional discussion of impacts on commercial fisheries and for hire recreational fishing. Section 3.11.2 of the FEIS has been updated to further address navigational hazards to fishing vessels in the WDA. While some temporary access restrictions will be required during construction and routine maintenance, access to the WDA and OECC will not be restricted during operations. Sections 3.9.2 and 3.10.2 of the FEIS have been updated to discuss impacts related to recreational fishing for large pelagic species.
0155-015	The recreational anglers, charter boat/for hire and commercial fleet not only fish but navigate through this area while transiting to key fishing grounds beyond the proposed wind turbine areas including the Canyons. What is a safe distance between wind turbine platforms in order to safely navigate these areas? There are reports of radar units impacted by the wind turbine arrays. According to the Cape Wind Energy Project, FEIS dated 2009, Appendix H “the wind farm does have an impact on navigation.” As a result how will this be adequately addressed without completely shutting down our ability to fish or safely transit and navigate such areas?	Section 2.1.1.2 and 3.11 of the FEIS have been updated to discuss the 2-nautical-mile-wide northeast-southwest navigational safety corridor identified by the Massachusetts Fisheries Working Group on Offshore Wind, as well as USCG’s Final MARIPARS. Sections 3.11.1 (vessel traffic in the WDA) and 3.11.2 (impacts on navigation through the WDA) of the FEIS have been updated to further discuss this topic.
0155-016	The Block Island wind turbine project is located near shore in state waters. The fish found within the Block Island wind turbine project waters did not include the Highly Migratory species and/or large pelagics found in the proposed wind turbine areas well off shore in federal waters. The species found in each area are significantly different and one is not comparing apples to apples. More study is needed and a pilot study is highly recommend since many of the items of concern cannot be addressed in the laboratory setting and can only be addressed in the proposed wind turbine areas.	Section 3.3.6.1 of the DEIS included a discussion of fish resources that may occur within the Project area based upon the best available science at the time of publication. All pre- and post-construction monitoring is being developed in coordination with the NMFS. Additional monitoring requirements and mitigation measures, if any, will be developed in coordination with the NMFS and included in the Record of Decision. Appendix D of the FEIS has updated the comprehensive list of the monitoring and mitigation that has been proposed for the agency-preferred alternative. Further discussion of highly migratory species is provided in the EFH Assessment, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ .

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0155-017	The RFA is a proponent of green energy but not to the detriment of our resource as well as when it proves to be economically feasible using only private equity, not rate payers or public funding sources.	Thank you for your comment.
0156-001	VCS promotes the broadest possible definition of conservation, including habitat, biodiversity, open space, and community character. Therefore, we believe that for offshore wind to succeed, the process must promote the protection of marine resources and provide a net benefit to host communities' local environments. To this end, we were very pleased to learn of the recent agreement with conservation groups to take measures to protect the endangered North Atlantic right whale. We also applaud the plans to allow our emergency management services to use Vineyard Wind's storage batteries, reducing local carbon emissions and air pollution.	Section 3.4.1.3 of the DEIS provided information on the proposed Resiliency and Affordability Fund. Therefore, no change to the FEIS is warranted. The FEIS has been revised in Section A.8.1.2 in Appendix A to the FEIS to indicate that Vineyard Wind has committed to allowing emergency management services to use the storage battery array.
0156-002	Stabilization of atmospheric greenhouse gas emissions is a global environmental priority; yet, renewable energy projects are not without environmental costs. We ask that BOEM regulatory oversight of this project prioritize the protection of biodiversity and habitat, and, to the greatest extent possible, to facilitate local benefit for the host community of an environmental nature. The most prominently discussed local benefit offered by Vineyard Wind to date has been the planned construction of an operation and maintenance facility in Vineyard Haven. While this is purportedly an economic benefit, we do not consider it to be an environmental benefit; to the contrary, it will increase our already significant problems of overdevelopment.	Section 2.4 of the FEIS has been updated to provide a summary of the potential benefits of the proposed Project. A cost-benefit analysis is outside of the scope of NEPA, although the DEIS and FEIS assess both beneficial and adverse impacts in the resource-specific sections within Chapter 3 and Appendix A, and also provides a comparison of the alternatives analyzed. The Operations and Maintenance facility will be evaluated, approved, and constructed subject to local regulations such as zoning, site plan, stormwater and building permit requirements.
0156-003	While we support this project in concept, we would prefer to see it take the lead in promoting additional community benefits in energy conservation, improved efficiency, and clean energy. This could take many forms: from earmarking dollars for public transportation, to improving energy efficiency of homes and businesses, to (our preferred outcome) providing rooftop solar for our island's schools and other municipal buildings.	Thank you for your comment.
0156-004	Development of new commercial energy ventures without an equally forceful effort at local energy conservation will undercut the magnitude of change required, and we will lose a pivotal opportunity. With emissions and temperatures rising nearly every year, time is of the essence.	Thank you for your comment.
0157-001	All cities/towns in Massachusetts are ramping up their demand for clean energy in the state...I wish for all renewables projects to go forward without impediment and look forward to Vineyard Wind's project to become a viable component of Watertown's clean energy plans.	Thank you for your comment.
0158-001	[The Vinyard Wind Project is] Much needed, environmentally and economically.	Thank you for your comment.
0159-001	I am very much in support of this project for both its environmental and economic benefits.	Thank you for your comment.

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0160-001	Turbine Size and resulting placement: With 9.5 MW turbines, you say: ...Using this 9.5-MW wind turbine also adds important flexibility in the wind array layout and reduces the total area of the turbine array, further minimizing any impacts to commercial fishermen, especially those working out of Massachusetts and Rhode Island ports.” What about 12 MW turbines?	The development of the EIS has been based on Vineyard Wind’s utilization of the PDE, which included a range of 8-10 MW WTGs as assessed in the DEIS and was updated to allow for up to 14 MW WTGs. The FEIS assesses the impacts of the reasonable range of Project designs that are described in the Vineyard Wind COP and presented in Appendix G by using the “maximum-case scenario” process. Therefore, utilization of the 9.5 MW machine falls within the PDE and impacts have been accounted for.
0160-002	Is there any Pile Driving, drilling and cable trenching noise mitigation?: Bubble Curtains...Hydro Sounds Dampers	Sections 3.3.2, 3.4.2, and 3.5.2 of the FEIS include a discussion of the types of noise reduction technologies to be used during pile driving activities
0161-001	The fishing mitigation package is a joke. More \$\$\$(squid, lobsters, crab, scallop, fin fish)than that gets landed at Point Judith daily in the summer than they planned to put in yearly! It needs to be flexible & not capped. If they do billions of damage they should be liable for billions not thousands.	Section 3.10.2 of the FEIS has been revised to include a discussion compensation. Section 3.10 of the FEIS has been updated to include details of mitigation and monitoring measures relative to commercial fisheries, including voluntary financial compensation. Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0162-001	We write this letter to express our concern regarding the approach to fisheries mitigation associated with the Vineyard Wind project. Seafreeze, Sea Fresh, and the Town Dock are the three largest seafood processors in RI and receive, purchase, process and sell most of the product harvested in the Vineyard Wind project area. Despite this we have been excluded from meaningful participation in the process for developing, informing and approving fisheries mitigation. The direct economic impacts to our companies resulting from the Vineyard Wind project have been left out of the fisheries mitigation plan offered by Vineyard Wind to the Rhode Island fishing industry. Just as vessels will be adversely impacted, shoreside infrastructure as a whole will be negatively affected by the project, yet none of it was accounted for in Vineyard Wind report or plan.	Section 3.6.1 of the FEIS has been updated to include information for ocean economy employment data and Sections 3.6.1 and 3.6.2 of the FEIS have been updated to include seafood processing and other fishery support businesses in relation to commercial fishing industry.
0162-002	Vineyard Wind has been involved in an ongoing series of negotiations with Rhode Island’s Fishermen’s Advisory Body (FAB) to determine an adequate compensation plan to offset economic impacts anticipated from the development of the nation’s first wind energy facility in federal waters. This process has lacked structure and transparency. Furthermore, the membership of the FAB does not include representatives of Rhode Island’s most economically important federally managed fisheries, nor any representatives from any of Rhode Island’s three largest seafood businesses. We therefore have been relegated to public comment periods only, rather than having a seat at the table, for an issue that stands to have significant economic impacts on our businesses.	Section 3.10.2 of the FEIS has been revised to include a discussion of displacement and potential conflict over fishing grounds and voluntary compensation. Section 3.10 of the FEIS has been updated to include details of mitigation and monitoring measures relative to commercial fisheries, including voluntary financial compensation. Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0162-003	In addition to the serious problems associated with the Rhode Island process, we remain troubled that the ultimate approval of Vineyard Wind’s project may hinge	Section 1.1 of the DEIS contained information on the background of the process and project. Appendix C (formerly Chapter 4) of the FEIS has been updated with

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	upon its engagement with fishing industry members of only one state. Unlike the Block Island Wind Farm, the Vineyard Wind project is proposed to be located on the Outer Continental Shelf in the U.S. Exclusive Economic Zone. Activities in federal waters impact other ocean users from a wide range of states, including commercial fishing which is primarily federally permitted and operates outside of any one state’s jurisdiction. The consideration of only a sub-set of one state’s citizens in determining a project’s viability would set an alarming precedent for future projects in federal waters that may impact Rhode Island fisheries and associated businesses, as well as those based in other states in the region.	information on the coordination and consultation process to date for the proposed Project. Prior to preparation of a DEIS, BOEM held five public scoping meetings near the proposed Project area to solicit feedback and identify issues and potential alternatives for consideration. The topics most referenced in the scoping comments include commercial fisheries and for-hire recreational fishing, Lewis Bay, the Project description, socioeconomics, and alternatives. Additional public input opportunities occurred during the proposed Project’s planning and leasing phases between 2009 and 2015. BOEM also consulted with state, federal, and tribal agencies. BOEM considered all of the resulting comments while preparing this DEIS. Furthermore, BOEM published a DEIS on December 7, 2018, which initiated a 45-day comment period open to all. BOEM used the comments received on the DEIS, as well as the SEIS, to inform preparation of the FEIS.
0162-004	we reiterate our previous request to BOEM and Vineyard Wind that an effective fisheries mitigation plan would take the approach of first avoiding conflicts to the extent possible, then minimizing any impacts that are truly unavoidable through effective design, and finally consider appropriate monetary compensation for any residual impacts to both fishing vessels and affected shoreside infrastructure, based on accurate and comprehensive economic impact studies.	Section 3.6.1 of the FEIS has been updated to include information for ocean economy employment data and to Section 3.6.2 of the FEIS for impacts on commercial fisheries and shoreside industries as well as the potential “Ocean & Fisheries and Wind Fund” that could assist in fishery technology. Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0163-001	Vineyard Wind, incorrectly asserts that shoreside fisheries based businesses will not experience negative economic impacts from its proposed project, and therefore offers no compensation for shoreside fisheries businesses.	Section 3.4.2 of the DEIS discussed potential impacts on shoreside fish businesses. Section 3.10 and Appendix D of the FEIS have been updated to include additional information on compensation for shoreside businesses.
0163-002	...the compensation offered to fishing vessels themselves is woefully inadequate. As detailed in the attached letter, BOEM reduces impacts on fisheries from “major” to “moderate/minor” due to its assumption of a comprehensive and appropriate fisheries mitigation and compensation plan. Vineyard Wind is not offering a comprehensive or appropriate mitigation or compensation plan to RI fishing vessels and businesses that would reduce impacts from “major”, and has yet to offer any compensation or mitigation to the fishing industry from any other state. This is concerning as regards future proposals in other areas. Based on major and unmitigated impacts, Vineyard Wind’s project should not go forward.	Section 3.10 and Appendix D of the FEIS have been revised to include the Vineyard Wind’s voluntary established gear loss and revenue compensation funds for fishing interests based in Rhode Island, Massachusetts, and other states. Please see Section 3.10 and Appendix D of the FEIS for more details on the measures.
0164-001	This project is a small but very significant investment in our environmental survival.	Thank you for your comment.
0165-001	I wanted to comment on a few misconceptions in the media on this project. The epibenthic species attached to the wind towers will attract species like black sea bass and other pelagic feeders that are migrating into Southern New England Waters from the Mid-Atlantic region. The problems with the commercial lobster fishery in SNE is warming waters and shell disease (not the existence of wind farms). The lobster pot fishery and ship strikes pose more of a threat to North	Sections 3.1.2, 3.2.2, and 3.3.2 of the FEIS have been revised to explain potential benefits and caveats of the reef effect and acknowledge the possibility of infestation by invasive species. Section 3.4.2 and Appendix D of the FEIS have been updated to include a discussion of monitoring and mitigation that has been proposed for the agency-preferred alternative. Monitoring requirements are being developed with researchers, environmental NGOs, State, and Federal agencies.

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	Atlantic right whales than does the Vineyard Wind structures. Seismic surveys for oil/gas and US Navy training are emerging human activities that could effect NARWs. The shifting baseline in the ocean will cause changes in NARW feeding areas as the microbial food web displaces the grazing food chain which supports the large zooplankton prey of NARWs. This will require consideration during construction of the wind turbines and operational support, since Apex predators; forage fish and whales will occupy different places in the ocean in space and time than in the past.	
0165-002	An adequate regional monitoring plan [of the shifting baseline community in the ocean] is required to supplement the site specific proposals and research programs. Some of this can come from state/federal monitoring programs and research endeavors (science & modeling), but a major challenge is converting this data into information useful for diverse constituent groups; policy makers and regulators and elected officials at the grassroots and national levels. It is important to incorporate cutting edge science into the BOEM management process for offshore wind projects given the shifting baseline in the ocean which is occurring faster than the policy making & regulatory process. Good example is Omnibus Habitat Amendment 2 which was finalized in January 2018 and doesn't provide ways to address ocean climate change effects in the Gulf of Maine and Nantucket Sound which border Cape Cod. NOAA Fisheries published a report on this topic in 2017 on converting climate science into management advice.	Thank you for your comment.
0165-003	Ocean wind farms provide a source of renewable energy and are less damaging than oil/gas development (an observation from my 9 years living in Louisiana). Cape Cod's Blue Economy would benefit from development of offshore wind energy.	Thank you for your comment.
0166-001	The threat posed by climate change to our communities must be addressed. Renewable energy sources, such as wind, are a critical part of the solution. However, we also need to learn lessons from the past. When we were caught by the potential for hydropower, the innumerate dams built fundamentally changed ecosystems and almost killed off the salmon population. Let's not let the same thing happen with offshore wind development. As research shows there are significant negative impacts on fish populations in response to electromagnetic fields, we should make every effort to minimize those impacts. The current EIS does not address this adequately. I am not an engineer, but here are three possible solutions to consider: 1) require multiple wind farms to share conduits, thus minimizing the number of cables, 2) bury the cables deeper, and 3) install some kind of extra shielding to minimize the electromagnetic field.	To minimize EMF generated by cables, all cabling would be contained in grounded metallic shielding to prevent detectable direct electric fields. Vineyard Wind would also bury cables to a target burial depth of approximately 6.6 feet (2 meters) below the surface. Please see Section 3.3.2 of the FEIS for more information on EMF and fish. Section 2.1.7 of the DEIS included information on the documents consideration of shared cable corridors and offshore regional transmission networks.

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0166-002	The second deficiency in the EIS is a lack of consideration for marine traffic safety. The wind farms are what basically amount to a city on the water. Or perhaps a large business complex. Imagine having a city on land where the roads were not wide enough to accommodate ambulances, and, as a result, it would take emergency personnel hours to get to the center of the city because they had to hike in instead of driving. We would not allow that on land and we should not allow that in the sea. This the first of many wind farms and will set the precedence for the “rules of the road” so to speak. The roads should be large enough so that fisherman, scientists and other people working on the ocean can do so safely - it is their workplace.	Section 3.11.2 of the FEIS has been revised to discuss coordination with the USCG, and to include an expanded discussion of the impacts on navigation through the WDA.
0167-001	Transit corridors must be methodically laid out to the standards using the Guidance on Maritime Security Transit Corridor where the standard is for two lanes, one coming and one going with a 1.5 nautical mile (NM) for each. https://combinedmaritimeforces.com/2017/09/06/guidance-on-maritimesecurity-transit-corridor The fishermen’s safety is always our number one priority. Without adequate transit corridors the fleet will not be able to transit safely in from sea during inclement weather and will be forced to travel countless hours/miles around the wind lease area in its entirety.	Sections 2.1.1.2 and 3.11 of the FEIS have been revised to address both the 2 nautical-mile-wide navigational safety corridor identified by the Massachusetts Fisheries Working Group on Offshore Wind, as well as USCG’s Final MARIPARS. The revised supplemental Navigation Risk Assessment prepared for Vineyard Wind and included as COP Appendix III-I (Epsilon 2020a) as well as the USCG report was used to update the FEIS.
0167-002	Environmental impacts are not going to be fully determined until after the entire wind lease area is developed. The unknown effects of adding structure, also known as reefing, into the water column will need to be closely studied as they are going to create false habitat and in an environment with an ever increasing population of Black Sea Bass these structures will add to their continued increasing population as a false habitat. Black Sea Bass are a predatory fish and consume lobsters whole.	Sections 3.1.2, 3.2.2, and 3.3.2 of the FEIS have been revised to explain potential benefits and caveats of the reef effect and acknowledge the possibility of infestation by invasive species. Post-construction monitoring of benthic habitat and of fisheries resources are described in Sections 3.2.2 and 3.3.2 of the FEIS.
0167-003	The scour around the structures is also a great concern as the dynamic environment in which these structures will be placed is that of sand and mud creating sand waves behind each structure will further upset the environment.	Section 2.1.1 of the DEIS provided a description of the Proposed Action, including scour protection. An updated discussion of the geology and seafloor conditions in the WDA, including a discussion of scour is provided in Appendix E, Section E.3.
0167-004	We are also concerned about the impacts to the lobster and conch resource throughout the entire wind lease area and given the length of time it takes for either species’ to become sexually mature, lobster approximately 7-8 years and conch 9-10 years, any impact on them will be detrimental to the overall health of the resource.	As shown on Figure 3.10-3 of the FEIS, lobster landings from the portion of the WLA to be affected are low. As discussed in Section 3.10.1 of the FEIS, conch/whelk are not fished in the WLA. No change since the DEIS.
0167-005	Electromagnetic Fields (EMF) have not been fully studied on what this will do to all the species that are harvested within the lease area. EMF has been tested on a very small and preliminary scale at URI and with only a lab test being done. There has not been enough research done on the large scale impacts of EMF on all the species that are harvested from within the lease area. We are extremely	To minimize EMF generated by cables, all cabling would be contained in grounded metallic shielding to prevent detectable direct electric fields. Vineyard Wind would also bury cables to a target burial depth of approximately 6.6 feet (2 meters) below the surface. Sections 3.2.2, 3.3.2, 3.4.2, and 3.5.2 of the FEIS have been updated to include additional information on EMF-related impacts on

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	concerned given the number of inter-array cables between turbines and the cables to shore.	benthic resources, fish and invertebrates, marine mammals, and sea turtles, respectively. Sections 3.3.2, 3.4.2, and 3.5.2 of the FEIS have been updated to include additional information on operational noise impacts on fish and invertebrates, marine mammals, and sea turtles, respectively.
0167-006	We are also troubled about the burial depth of these cables and should these cables not be buried, concrete mattresses will be used in areas with strong currents and shifting sands. This is a formula for hang ups by mobile gear and will increase the EMF in the water we do not know if it will create an electric fence to the vulnerable species' until it can be reburied.	Section 2.1.1 of the FEIS has been updated to address cable burial risk for the proposed Project. The OECC would have a target burial depth of up to 5-8 feet (1.5-2.5 meters). To minimize EMF generated by cables, all cabling would be contained in grounded metallic shielding to prevent detectable direct electric fields. Vineyard Wind would also bury cables to a target burial depth of approximately 6.6 feet (2 meters) below the surface. Please see Section 3.3.2 of the FEIS for more information on EMF and fish.
0167-007	Turbine Layout has also been one of the most discussed topics at the MA Fishermens Advisory meetings. Without consistency in ALL the lease areas the existing mobile and fixed gear fishing industry will not be able to maintain the cohesive way of fishing together as they have for countless decades. The turbine layout recommendation has always been to set the turbines one NM apart and on an East West pattern or on the 0's or 5's as fishermen refer to this pattern. Vineyard Wind is the first to a large scale wind farm and setting the standard high and working with the fishing industry to mitigate how to best move forward has always been encourage.	Chapter 2 of the DEIS and FEIS includes a discussion of alternatives for the Proposed Action.
0167-008	Research needs is also an area that the MLA has always been asking for as these wind farms will have an impact on the ecosystem and we do not have time to wait. The MLA is committed to working with ALL lease holders on a multitude of research so we can better understand what impact these structures will have and how to better mitigate any changes in the future. We collectively have one shot to get the baseline research done preconstruction because once they are up the dynamic environment has changed forever. The standard for research is a time series of 7 years and unfortunately, we will not have the pre construction time series of 7 years. The MLA is currently working with VW and UMASS Dartmouth on developing a multi species survey for lobster, lobster larvae, black sea bass, plankton, water temperature and ocean acidification. We are hopeful to get this survey in the water this spring.	Sections 3.1 to 3.12 and A.8.1 to A.8.5 in Appendix A of the FEIS include a discussion and analysis of current conditions affected by the Project. Additional information regarding monitoring and mitigation measures proposed for the Project are provided in the updated Appendix D of the FEIS.
0167-009	Protected Species is yet another great concern to the MLA as the fixed gear industry is continually under siege to do more towards the protection for the Right Whale. Massachusetts commercial lobstermen are doing more than anyone in the world for the conservation of Right Whales. We are extremely apprehensive that ANY impact to their feeding grounds or ability to traverse the	There are no identified entanglement issues associated with the Vineyard Wind Project that could be misidentified for fixed gear impacts. Although there is no direct evidence available that NARW foraging would be disrupted from operation of the wind facility. Section 3.4.2 and Appendix D of the FEIS have been updated to include a discussion of monitoring and mitigation that has been

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	wind lease area will some how come back to bite the lobster/fishing industry and become their responsibility. There needs to be an in-depth study in the impacts to the food sourcing and species in the entire wind lease area as the dynamic environment will change once the lease area has been fully developed. See the sightings chart ... [provided in the submission].	proposed for the agency-preferred alternative. BOEM is developing post-construction monitoring plans that would monitor for both species occurrence and any habitat changes in the area. Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. Additional mitigation and monitoring measures may arise from consultations and coordination with Federal and State resource agencies. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0167-010	The number of Right Whale sightings continues to increase over the years in Southern New England and more so in the entire wind lease area. The impacts to these whales will not be realized for years to come and at that point it may be too late to undo the harm these structures will cause.	Section 3.4.2 of the FEIS has been revised in coordination with NMFS and includes the proposed mitigation and monitoring measures for marine mammals. Furthermore, Section 3.4 and Appendix D of the FEIS include the draft Incidental Harassment Authorization measures proposed to be issued under the MMPA. Further details regarding acoustic effects to these species are provided in Appendix F of the FEIS and in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ .
0167-011	[T]he MLA is greatly concerned about the area in which Vineyard Wind will be developing the first large scale offshore wind farm in the United States due to the highly productive fishing grounds for a multitude of fisheries and we want to ensure that systematic baseline studies are done of the ecosystem and all the sea life there within. The MLA is committed to working the commercial fishing industry and Vineyard Wind throughout the project to ensure all voices are heard and concerns are vetted. BOEM has the ability to make this happen as we are moving forward into the unknown let's move forward in a direction that ALL other projects will adhere too the high standard you set today. Our hope is to look back one day and know that we all did what was right by the commercial fishing industry and the ecosystem we all depend upon.	Thank you for your comment.
0168-001	Delay wind farm installations until a proper grid can be established. Vineyard Wind is the first large scale offshore wind farm. It will set precedents that are going to be followed as the industry develops. From the start, BOEM alone has the power to properly regulate this development with guidance from past land based development. Do not give this power over to companies and financial firms who are mostly struggling to make their stakeholders happy...	Section 1.2 of the DEIS included a discussion on the Purpose and Need for the proposed Project. In addition, Section 2.1.1 of the FEIS includes a detailed description of the Proposed Action. Appendix C (formerly Chapter 4) of the FEIS has been updated with information on the coordination and consultation process to date for the proposed Project.
0168-002	BOEM has leased most of the continental shelf South of Rhode Island. Each wind farm that is proposed is installing an export cable from the turbines to land. Let me be clear, within a lease area, each time a developer sells a power contract to an onshore distribution agency, they are proposing installing a new cable for that power contract....The leases have been bought and companies are selling	Section C.5 in Appendix C of the FEIS includes a detailed discussion for Alternatives Considered but not Analyzed in Detail for the proposed Project.

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	power contracts to states who have mandated utilization of renewable energy by specific dates. This is reckless....Cables everywhere and all stakeholders will lose.	
0168-003	I urge BOEM to resist political pressures and take the time to properly plan the offshore wind projects. The stakes are high for investors as well as citizens. If we do this wrong from the start, we will not only hinder or destroy one of our best chances to develop lower CO2 emitting power sources...but we could turn much needed investors away from this next grand engineering project that the US is undertaking.	Thank you for your comment.
0168-004	BOEM must not allow itself to be given thousands of pages of documents and just rubber stamp them. If we let one stakeholder group run the show, we are going to head in another unbalanced direction for humanity...BOEM should be independent of these interest groups and lead this development responsibly.	Chapter 1 of the DEIS and FEIS and Appendix C (formerly Chapter 4) of the FEIS discuss the proposed process under BOEM's authority.
0169-001	We are in favor of responsible development of offshore wind energy resources as long as the environment and marine opportunities, including recreational fishing are protected. [My organization,] RISSA would like to have rod and reel surveys done as part of the wind farm research protocol as this is how recreational fishermen (and many commercial fishermen) fish. Rod and reel surveys conducted in all seasons when fish are present would give researchers a good idea of what fish are in the wind farm area before, during and after construction. Additionally, research methods to study impacts on pelagic fish such as sharks, tuna, mahi, etc. should also be done...we would be pleased to work with you or your scientific consultant to help design the details of a sampling program, but we believe that actual field sampling should be started at least 24 months before any construction. Sampling should include rod and reel surveys of bottom fish and pelagic species during spring, summer, and fall periods as well as bottom fishing in rocky areas during winter months. This sampling should occur in each construction area for at least one year prior (three or four seasons); during the construction period; and for at least two years post construction. A report should be generated that describes sampling methods, results, and interpretation regarding what effects were observed. A follow-up report should be written to evaluate potential mitigation that could be implemented in subsequent construction areas as development continues. Study methods for pelagic fish such as mahi, tuna, sharks as well as mammals should also occur as part of the study protocol. Methods may include aerial surveys, acoustic tagging and other methods to be determined. In addition, observational studies should be conducted to observe recreational fishing activities occurring in the construction area on a similar schedule. This information should be included in the report mentioned above. An additional aspect of research should include surveying individuals who fish in this area by phone, email, and in-person interviews to determine how their	Thank you for your comment.

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	activities in the study area are changing before, during, and after construction. RISAA can help with coordination between these individuals and the researchers.	
0169-002	RISAA asked that additional structure be placed at the base of turbines to create habitat i.e. mussel growth, small fish and larger fish. With minimal effort pylons can create ideal rod and reel fishing habitat just like the Block Island Wind Farm turbines...we believe that the four-legged structures with cross supports used at the Block Island Wind Farm provide better habitat than mono-pile structures and we would prefer seeing that technology used to provide this additional habitat. If mono-pile structures are used we believe that additional structure can be beneficial as habitat and also beneficial to the structures as anti-scour pads. When anti-scour pads are designed the habitat value should be considered. The National Oceanic and Atmospheric Association (NOAA) has many references to artificial reefs and what makes them productive. They indicate that hard structure rising above the floor of the ocean provides surfaces for encrusting organisms and actual relief provides locations for fish to gain shelter. They recommend hard surfaces like stone, concrete or metal and actual three dimensional spaces like reef balls, concrete pipe sections, caves, etc. Based on this we believe that large rock placed at the base of the tower structures with gaps and voids will provide the best enhanced fish habitat.	Sections 3.1.2, 3.2.2, and 3.3.2 of the FEIS have been revised to include additional information on the potential reef effect from cable protection and scour protection and cite a 2018 study by Causon and Gill, among others.
0169-003	[Our] third point recommended a combined stakeholder advisory board to explore the impacts of not only individual projects but more importantly the cumulative impact of multiple projects, lease areas and developers. Presently such a fishermen/stakeholder panel with appropriate recreational participation does not exist.	Thank you for your comment.
0171-001	Vineyard Wind is the first major off shore wind project in the United States and it represents a significant step in reversing our reliance on fossil fuels. The positive environmental impacts are numerous, including but not limited to helping to ameliorate the impacts of ocean acidification, loss of sea ice, sea level rise and extreme weather. In addition, climate change poses significant threats to the Cape's natural resources and economy so this project gives us the opportunity to participate in one of many efforts in response to this crisis.	Thank you for your comment.
0171-002	There are potential threats to our marine and coastal environments as well as threats related to our drinking water. Over the past several months Vineyard Wind has worked closely with the Town of Barnstable, local fishermen, conservation NGOs, state and local agencies to ensure that this project will occur in a way that avoids, minimizes and mitigates adverse impacts on the health of our coastal and marine ecosystems. While not every concern was fully mitigated, Vineyard Wind was able to greatly minimize impacts. With a project as important and critical to the world we live in as this one, if the public and environmental	Thank you for your comment.

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	benefits outweigh any detriments, as it does here, we should embrace the opportunity. The Town Council gave its full support of this project.	
0171-003	Vineyard Wind has worked closely with our Town Manager as well as DPW to determine the best route once the cable made landfall to ensure the project's impacts are minimal where it concerns sensitive habitat areas and residential neighborhoods.	Section A.8.6.2 in Appendix A of the FEIS has been updated to include additional information on the onshore cable route and for details on landscaping around the proposed substation site.
0171-004	The singular most critical concern is the risk to groundwater and public water. This issue is so critical to the health of our Town and to the Cape in general, that it was included in our Host community Agreement with Vineyard Wind, which I would point out received a unanimous vote of support by the Town Council. Specifically, our concerns were in relation to the proposed sub-station. The proposed location of Vineyard Wind's electrical sub-station in Independence Park, Hyannis is located above the sole-source aquifer that services the Town's public water supply wells in the Hyannis area and up-gradient from the Town's Hyannis wells. The electrical substation will house yet-to-be-identified electrical equipment, some of which is expected to be cooled by dielectric fluids. These dielectric fluids, if not properly managed, could pose a risk to groundwater and public water supplies. Everyone agrees that a release of dielectric fluids and other hazardous materials from Vineyard Wind's electric substation must be avoided. In order to ensure safety and containment of these fluids, Vineyard Wind has committed to providing design containment equal to a "minimum of 110% of the dielectric fluid volume contained in the associated equipment plus an additional volume to include the 100-year storm event over a 24-hour period, as well as to providing dielectric fluid containment under each piece of substation equipment containing dielectric fluids." The company has committed to state of the art containment at its substation in Independence Park and is working closely with Town officials on final design standards. Additionally, \$16 million in supplemental funding included in the host community agreement with the town has been dedicated to future water infrastructure and protecting our drinking water resources.	Section 3.2.2.3 of the DEIS (A.8.2 in the FEIS) included a discussion of the proposed substation and the proposed impervious containment sumps for dielectric fluids, as well as, additional substation components and measures to minimize or avoid potential impacts on water quality in the event of a potential spill. Therefore, no change to the FEIS is warranted.
0171-005	The Town also worked with Vineyard Wind to mitigate noise pollution generated by the substation. To ameliorate this concern Vineyard Wind will employ enhanced noise mitigation through the addition of barriers in order to reduce the impacts on residents at the Village Green complex, they have also added enhancements to the proposed barrier walls and added interior walls to better address noise concerns. Vineyard Wind will also provide complete visual screening so as to nullify the visual pollution that might otherwise impact residents.	Section A.8.6.2 in Appendix A of the FEIS has been updated to address this comment.

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0171-006	<p>In order to ensure protection of eelgrass, Vineyard Wind utilized surveys done by the Division of Marine Fisheries. The data confirmed that eelgrass can be avoided along the Covell’s Beach route. This is critical as this is an important habitat area that provides refuge and sustenance to a variety of animals, and is a critical component of sediment and shoreline stabilization. The horizontal directional drilling approach onto Covells Beach will avoid all documented eelgrass and mapped hard bottom, eliminating potential nearshore environmental impacts. While surveys determined that it was impossible to totally avoid species that were considered Special, Sensitive and Unique (SSUs), the impacts were minimal and in balancing the entire project, the totality of the benefits outweighed these impacts.</p>	<p>Section 3.1.2 of the FEIS explains how eelgrass would be avoided completely.</p>
0171-007	<p>The species of greatest concern is the critically endangered right whale. According to the Office of Energy and Environmental Affairs’ Ocean Management Plan and its mapping of SSUs, the project will not impact core habitat for North Atlantic Right Whales. However, a group of 20-30 whales has been seen aggregating south of the site. It is of the utmost importance that this dynamic grouping be monitored and that drilling ceases when they are in the area, and that vessel speeds are reduced. However, critically endangered Northern Right Whales are severely impacted by ocean noise. Noise from shipping, sonar testing, and drilling, drown out the sounds that whales and other marine animals rely on to navigate, source food and find a mate. On January 22, 2019 Vineyard Wind reached an agreement with NRDC, NWF and CLF which identified that the protection of the critically endangered northern right whale was a top priority. Included in the agreement is a cessation of pile driving while North Atlantic Right Whales are likely to be present in the area, and during those periods where there is likely to be a presence enhanced protocols are being put into place safeguard against the effects of pile driving on these whales. Vineyard Wind has proposed 8 mitigation measures including Passive Acoustic Monitoring (PAM) and Protected Species Observers and the agreement ensures that the turbine construction are being curtailed in the winter and early spring when the presence of North Atlantic Right Whales is likely. There are being continual monitoring. The establishment of a “Wind and Whales Fund” further signals Vineyard Wind’s dedication to the protection of this iconic species.</p>	<p>Section 3.4.2 of the FEIS includes a discussion of acoustic impacts on marine mammals. Further details regarding acoustic effects to these species are provided in Appendix F of the FEIS and in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/.</p>
0171-008	<p>Many are concerned about the impacts on avian species. In order to mitigate harm to birds, Vineyard Wind has reduced the number of turbines as well as the rotor swept areas and number of lights required. They have also reduced the height of the turbines as well as the number of areas available for perching. While this will not prevent all fatalities, it will substantively mitigate them.</p>	<p>Thank you for your comment.</p>
0171-009	<p>All major projects will have some impact and Vineyard Wind is no exception. But failure to move forward on projects such as this will have far more</p>	<p>Thank you for your comment.</p>

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	catastrophic effects to humans and the environment and will imperil even further those things that we profess we want to protect.	
0172-001	A foundation and some cable will be a fine home and protection for small marine life. Beside all the barrier reefs that were made with non-productive material, this one will be productive for the marine life and the citizens of Massachusetts.	Thank you for your comment.
0173-001	I am mostly in support of this renewable wind energy project. I agree with many that the affects of global warming and ocean acidification are already destroying aquatic life to a point of no return. Our fisheries are in peril. We can only hope that renewable energy projects and regenerative agriculture (as well as a cultural shift in reducing energy use) can begin to curb the levels of CO2 in the atmosphere.	Thank you for your comment.
0173-002	The EIS states there is potential for temporary or permanent hearing loss of mammals and fish during the 102 days of pile driving. It would be a big mistake to NOT use the most effective technology available for mitigating sediment noise for these threatened and endangered creatures.	Section 3.3.2 and Appendix D of the FEIS include a discussion of noise reduction technologies proposed for use during pile driving activities. The proposed use of noise reduction technologies will be employed to ensure a minimum attenuation of 6 dB, resulting in reduction in the areas affected by Project-related noise impacts. Section 3.4.2 of the FEIS includes a discussion of acoustic impacts on marine mammals. Further details regarding acoustic effects to these species are provided in Appendix F of the FEIS and in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ .
0173-003	I urge you to mitigate the noise of pile driving by using double wall pile technology researched by the University of Washington and described here: http://www.marinecontech.com/content/uploads/2015/02/Symposium-Full-Presentation.pdf	Sections 3.3.2, 3.4.2, and 3.5.2 of the FEIS includes a discussion of the types of noise reduction technologies to be used during pile driving activities
0174-001	As a resident of Massachusetts I support and approve the proposed wind energy facility by Vinyard Wind. I believe there has been due diligence in researching every aspect of the project and any potential negative impact on wildlife, marine life and the fishing industry has been met. The positive impact of the project is not to be understated.	Thank you for your comment.
0175-001	It is absolutely necessary that we continue to find and utilize new forms of renewable domestic energy like wind turbine-generated energy to replace fossil fuels.	Thank you for your comment.
0175-002	Mitigation measures put forth by Vineyard Wind and in consultation with other agencies illustrate reasonable measures that would reduce irreversible and irretrievable impacts during the construction, installation, operations and maintenance phases of the project.	Thank you for your comment.
0176-001	Covel Beach is one of the most popular public beaches on cape cod and the adjacent waters are some of the busiest water sports areas. During certain seasons the nearby waters are busy fishing spots as well. Vineyard wind promised that the	The proposed cable transition from offshore to onshore would be achieved through HDD techniques as discussed in Section 2.1.1.1 of the FEIS. The use of

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	cable would be buried 60 under the sea bed. The enforcement of this is critical to ensure that the public is safe should there ever be any electrical leakage.	HDD techniques will avoid or reduce impacts on the nearshore area, the intertidal zone, the beach, and adjoining coastal areas.
0177-001	We need to do all we can to reduce our use of fossil fuels, and this project helps move us in the right direction.	Thank you for your comment.
0177-002	The surface area of the turbine platforms will act as an artificial reef, providing additional nursery grounds for some species, thus enhancing fisheries.	Sections 3.1.2, 3.2.2, and 3.3.2 of the FEIS have been revised to explain potential benefits and caveats of the reef effect and acknowledge the possibility of infestation by invasive species.
0178-001	The DEIS refers readers to Appendix III-B of the Construction and Operation Plan (COP) for a complete description of emission points and emission calculations. However, the DEIS does not contain any quantification of emissions for any of the alternative scenarios, cumulative impacts analysis, or the included discussion on climate change...We note that detailed emissions inventories are periodically prepared by the Massachusetts Department of Environmental Protection and EPA. The FEIS should include tables with emissions information during construction and operation for each of the proposed alternatives. The FEIS should provide readers with air emissions calculations to allow for a better understanding of the impacts associated with each proposed alternative. All emissions calculations should be based upon an equipment list that BOEM anticipates will be used during the project...EPA's most recent comprehensive emissions inventory for the U.S. was for calendar year 2014, and is available at EPA's National Emissions Inventory (NEI) website at: https://www.epa.gov/air-emissions-inventories/2014-national-emissionsinventory-nei-data .	Section A.8.1 in Appendix A of the FEIS has been revised to include an analysis using EPA's AVERT and COBRA tools to assess air quality and health benefits.; however, please note that differences between the alternatives are very small and were not quantified.
0178-002	We also recommend that the discussion include an analysis of future emission reductions resulting from the production of electricity from this project and the corresponding decrease in electricity production from fossil fuel fired power plants in New England. The analysis should include the impacts to emissions of nitrogen oxides (NOx), sulfur dioxide (SO2) and carbon dioxide (CO2)...with regard to data for power sector emissions specifically, BOEM can refer to the annual emission report produced by ISO New England, available online at https://www.iso-ne.com/system-planning/system-plans-studies/emissions/ .	The emissions avoided, as described in COP Volume III, Appendix B, Table 5-2a (Epsilon 2020a), speculating on the future energy disposition in New England beyond assessing the difference in impact of Vineyard Wind vs. Fossil Fuel is outside of the purview of the FEIS. As such, no change to the FEIS is warranted.
0178-003	EPA appreciates BOEM's recognition of ozone as a regional pollutant, but the DEIS incorrectly indicates the construction air emissions will have a negligible impact because they are anticipated to last less than 2 years and attainment of the ozone National Ambient Air Quality Standards (NAAQS) is based on the annual fourth-highest daily maximum 8-hour concentration, averaged over 3 years. BOEM's conclusion is misleading because 1 or 2 years of elevated concentrations at nearby air monitoring stations could influence the 3-year average if exceedances of the NAAQS frequently occur during the construction period. We note that Vineyard Wind, LLC will be required to obtain emission	Section A.8.1 in Appendix A of the FEIS has been revised to include an analysis using EPA's AVERT and COBRA tools to assess air quality and health benefits. Vineyard Wind is required to have and is applying for an OCS air permit with the EPA which includes Prevention of Significant Deterioration (PSD).

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	offsets in accordance with applicable air permitting requirements, which may help mitigate potential impacts to air quality resulting from the project. BOEM should revise its analysis on potential impacts to the NAAQS to more accurately reflect the possibility of air impacts resulting from ozone formation downwind of the source due to emissions from the construction phase of the project.	
0178-004	In addition, although BOEM indicates that the use of fuel efficient engines will mitigate air impacts, the DEIS should evaluate other mitigation options as well. EPA recommends BOEM explore the feasibility of requiring additional mitigation measures such as anti-idling practices and the retrofitting or repowering of older equipment and vessels with the cleanest, most efficient technologies to further ensure air quality impacts will be minimal. EPA is willing to assist BOEM with the development of these mitigation measures.	Sections A.8.1.2 through A.8.1.4 in Appendix A of the FEIS have been updated to include additional information on proposed mitigation measures.
0178-005	The DEIS refers to air impacts as minimal or minor in several locations throughout the document. While the DEIS documents that operating emissions of the project are relatively small and fit these descriptions, we note that the project's potential construction period emissions exceed Clean Air Act permitting thresholds for major sources and are thereby subject to the Prevention of Significant Deterioration and Nonattainment New Source Review permit program. Although the operating emissions from the project are minimal and the construction emissions are temporary in nature, the project is subject to major source permitting regulations under the Clean Air Act. BOEM should revise the FEIS's characterization of air emissions or acknowledge, in text, the inconsistency in terminology between BOEM's characterization and EPA's forthcoming major source permitting actions to provide the general public with a better understanding of various actions addressing the Vineyard Wind project and how each respective agency classifies the impact.	Section A.8.1.2 of the FEIS has been updated to include the measures that Vineyard Wind has voluntarily committed to implement to avoid or reduce potential effects. Vineyard Wind is required to have and is applying for an OCS air permit with the EPA which includes Prevention of Significant Deterioration (PSD).
0178-006	Section 3.2.1 of the DEIS describes potential air quality impacts that may result from the project...the introductory paragraph on page 3-3 states the following: - The proposed Project's WTGs, ESPs, and OECC do not generate air emissions". Vineyard Wind's air permit application to the EPA indicates that the WTGs and ESPs will contain generator engines that produce air emissions... Although the overall emissions from generator engines on the WTGs and ESPs are minimal when compared to other emission sources for the project, BOEM should revise this characterization in the FEIS for accuracy.	Section A.8.1 (formerly 3.2.1) in Appendix A of the FEIS has been updated to clarify that certain sources do not generate air emissions during normal operations. The section also provides information on the aspects of the project that do generate emissions.
0178-007	Federal projects located within either a maintenance or a nonattainment area must be evaluated for applicability to the Federal General Conformity regulations found at 40 CFR 93.150-165. Specifically, if the total of direct and indirect emissions of a criteria pollutant or precursor in a nonattainment or maintenance area caused by a Federal action would equal or exceed the applicability	General Conformity was found to not apply to the proposed Project.

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	<p>thresholds established in 40 CFR 93.153, the requirements of general conformity must be satisfied.</p> <p>Before the project work commences, BOEM must evaluate if general conformity applies. If general conformity does apply, BOEM must complete a general conformity analysis consistent with the requirements found at 40 CFR 93.150-165 and submit the analysis to EPA for review. Please contact John Rogan of EPA’s Air Programs Branch at (617) 918-1645 or rogan.johna,epa.gov to discuss project General Conformity issues in greater detail.</p>	
0178-008	Section 4.2 of the DEIS indicates that EPA is only a co-action agency for ESA. We recommend that the FEIS reflect that EPA is also a co-action agency for interagency consultations under the MSA and NHPA.	The updated Section C.1.2 in Appendix C (formerly 4.2) of the FEIS has been revised to reflect the suggested addition.
0178-009	Based on our review of available information and stakeholder input we continue to support a composite alternative (Alternative D2 featuring east west WTG orientation and a minimum of 1 nautical mile spacing between WTGs in all directions combined with the reduced project size of Alternative E). That design appears to have the greatest potential for impact minimization and avoidance. We also understand that negotiations between Vineyard Wind, fishermen and the State of Rhode Island are ongoing and are focused at least in part on these issues...EPA looks forward to ongoing active participation in discussions regarding project alternatives as part of the BOEM process.	Section 2.5 of the FEIS has been included to identify the agency-preferred alternative. The Department of the Interior’s NEPA regulations 43 CFR § 46.420(d) state that the Preferred Alternative “refers to the alternative which the bureau believes would best accomplish the purpose and need of the proposed action while fulfilling its statutory mission and responsibilities, giving consideration to economic, environmental, technical, and other factors.” Pursuant to the OCSLA, BOEM is required to manage the development of OCS energy resources in an expeditious and orderly manner, subject to environmental safeguards including consideration of natural resources and existing ocean uses (43 USC § 1332(3)). This mandate requires BOEM to not only consider how impacts to natural resources and existing uses could be avoided, minimized, or mitigated, but also to consider factors that concern the technical and economic feasibility of developing the Project.
0178-010	...information from BOEM provided in December 2018, and during the recent public hearings on the DEIS indicates that Vineyard Wind has eliminated the New Hampshire Avenue landfall from consideration due to potential impacts in Lewis Bay, among other reasons...The proposed time-of-year restriction (TOYR) for in-water work at Covell’s Beach from May 1 to July 31 will reduce impacts to spawning horseshoe crabs. Similarly, a TOYR described in the DEIS on the installation of export cable conduits from April 1 to August 31 has been proposed to avoid impacts to nesting shore birds. EPA supports both of these proposed mitigation measures.	Thank you for your comment. As specified in Section 2.1 of the FEIS, the DEIS and SEIS contemplated two Onshore Export Cable Routes (OECRs), with alternative options within each route; however, since the publication of those documents, Vineyard Wind has stated all necessary state and local permits for the Covell’s Beach landfall location have been acquired. Therefore, the Proposed Action (Alternative A) and action alternatives only contemplate the one landfall location, Covell’s Beach landfall and onshore route. Alternative B therefore is no longer evaluated as an action alternative in this FEIS. In addition, Section 2.5 of the FEIS has been included to identify the agency-preferred alternative.
0178-011	EPA supports the Covell’s Beach landfall as it will result in fewer potential negative impacts to coastal habitats and resident marine life in Lewis Bay.	Section 2.5 of the FEIS has been included to identify the agency-preferred alternative.
0178-012	The interest in offshore wind power development, as reflected in the high bids during the recent auctions, underscores the need for BOEM to expand the cumulative impact scenario to explore future build-out conditions where the New	BOEM has revised the list of reasonably foreseeable future offshore wind projects based on project progress since publication of the DEIS, and this

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	<p>England lease areas are developed at different intensities for wind power. The current analysis does not include an evaluation of a full build future wind power development scenario covering the 900,000 acres covered by existing leases... We recommend that BOEM expand the scope of the cumulative impact analysis. The expanded scope would more fully consider future offshore wind buildout conditions, navigation corridors. WTG orientation, implications for the commercial fishing industry and potential impacts to the marine environment.</p>	<p>information and the methodology specified were used to prepare the SEIS for the proposed Project.</p>
0178-013	<p>We also encourage BOEM to use the cumulative impacts analysis to describe how the future buildout could benefit regional air quality and how it could help states more fully meet established renewable energy generation goals.</p>	<p>Additional clarification has been provided in Section A.8.1 in Appendix A of the FEIS. BOEM has revised the list of reasonably foreseeable future offshore wind projects based on project progress since publication of the DEIS, and this information was included in the SEIS and carried forward to the FEIS. The list of reasonably foreseeable future offshore wind projects is included in Appendix A of the FEIS. In addition, Section 2.4 of the FEIS has been updated to include a summary of the potential benefits of the proposed Project. Last, Section A.8.1 of the FEIS has also been updated to include additional benefits of offshore wind to health and climate change.</p>
0178-014	<p>The EPA regulates discharges from certain non-recreational vessels operating within the territorial seas through its Vessel General Permit. The US Coast Guard also has standards for vessels carrying ballast water within the waters of the U.S. (extending 12 nm from shore)...EPA recommends that the FEIS include these regulatory requirements and standards regarding ballast water management, and Vineyard Wind’s responsibility to coordinate with these federal authorities on such discharges in areas where applicable. We note that these requirements are identified in the draft COP (Vol III, p. 56) and we also recommend that they be referenced in the FEIS (for example in Table 1.3-1).</p>	<p>The FEIS addresses this comment. Please see Table 1.3-1 in Appendix B of the FEIS. Section A.8.2 of the FEIS has also been updated to address the compliance with these requirements.</p>
0178-015	<p>We also recommend that the FEIS include a discussion of how the project (during construction and operation) will be consistent with MARPOL ship waste management practices with a specific focus on the discharge of plastics.</p>	<p>Section A.8.2.2 in Appendix A of the FEIS has been updated for a discussion of the types of allowable discharges Project vessels.</p>
0178-016	<p>Page 2-8 of DEIS mentions that before construction begins an Oil Spill Response Plan, Emergency Response Plan and Safety Management System will be developed for the project...EPA supports these efforts and requests the opportunity to review drafts of these specific protocols prior to finalization.</p>	<p>Thank you for your comment.</p>
0178-017	<p>The DEIS provides two options for the cable route through Muskeget Channel. More hard/complex substrate has been identified in the Western Muskeget channel corridor (2,022 acres) than Eastern Muskeget Option (2,003 acres)... The FEIS should explain how all available information, including any data not yet evaluated and presented in the DEIS, will be used to avoid and minimize impacts to hard and complex habitat and the process to select the eastern or western option.</p>	<p>Hard-bottom habitats along the two Muskeget Channel Options, as well as the differences in potential impacts between the two and the process used for route selection, are described under Sections 3.1.1, 3.1.2, and 3.2.2 of the FEIS.</p>

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0178-018	The DEIS describes the presence of known eelgrass beds near the Covell’s Beach landfall site being limited to the Spindle Rock bed, approximately 380 feet (100 meters) from the proposed OECC approach to the Covell’s Beach landfall site. However, information provided at BOEM meeting on December 6, 2018 indicated that a new eelgrass bed had been identified. The FEIS should present this new information and describe how this bed will be avoided, if it is located within the OECC.	The location of eelgrass beds is discussed under Section 3.1.2 of the FEIS and the section has been revised for additional details on distances and avoidance measures.
0178-019	We recommend that the FEIS explain how the seafloor mapping will be supplemented prior to construction to help avoid impacts from different dredging and cable burial methods. We also recommend that BOEM require dynamic positioning of construction vessels in areas of hard/complex seafloor habitat or in areas that are not fully mapped but likely to contain these habitats.	Additional text clarifying that iterative analyses of survey data and the prohibition on anchoring in special habitats are discussed under Section 3.1.2 of the FEIS.
0178-020	The discussion of dredging in areas of large sand waves (DEIS page 2-6) references COP Volume II-A, Figure 2.1-13, which indicates areas prone to large sand waves and thus likely locations for dredging activity. ...the DEIS...discussion would benefit greatly from a visual presentation in the EIS itself instead of a reference to another document.	Section 2.1.1.1 of the FEIS indicates the exact page number of the COP where this information can be found. Note that the correct figure number is 2.1-17.
0178-021	EPA generally supports the following mitigative measures and monitoring proposed in Appendix D of the DEIS to minimize and assess benthic impacts: <ul style="list-style-type: none"> • Utilize horizontal directional drilling wherever possible (and we recommend that the FEIS more fully describe the locations where additional directional drilling could avoid impacts from the project); • Avoid cable installation on hard/complex habitat wherever possible; • Require the use of mid-line anchor buoys to reduce the amount of anchor chain or line that touches the seafloor in areas where benthic vegetation or other complex habitats may exist; • Avoid trenching when other less damaging methods (e.g., plowing) are available for cable installation. We recommend that BOEM establish a firm requirement that all dredging and cable installation activities use the least environmentally harmful method practicable for each area. In general, because it results in substantially greater impacts, dredging should be minimized to the greatest extent practicable; and • Conduct long-term monitoring to document the changes to the ecological communities on, around, and between WTG foundations and other benthic areas disturbed by the proposed Project, including protected species movement and habitat use. 	Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. Additional mitigation and monitoring measures may arise from consultations and coordination with Federal and State resource agencies. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0178-022	EPA supports measures proposed in the DEIS to minimize impacts to birds but is concerned that there is no apparent monitoring effort proposed to assess the actual impacts from bird collisions with turbines. Relying on the “healthy” state of bird	Section A.8.3.2 and Appendix D of the FEIS include updated mitigation and monitoring measures that would be implemented to avoid, minimize, and mitigate adverse impacts on birds.

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	populations likely to encounter the turbines seems insufficient, particularly since populations of some species are in decline...We recommend that the FEIS better explain how actual impacts to birds will be assessed once the wind farm is operational and consider appropriate mitigation for significant mortality.	
0178-023	These impacts [on birds] should be incorporated into the cumulative impact assessment as well.	Section A.8.3 in Appendix A of the FEIS has been updated for a discussion of impacts on birds.
0178-024	On January 22, 2019 Vineyard Wind, the NRDC, NWF and CLF announced an agreement to establish protective actions to protect North Atlantic Right Whales during construction and operation of the project...We recommend that the FEIS describe how the applicant/NGO agreement will be considered in the context of overall mitigation measures and how BOEM will consider and coordinate the agreement with relevant state and federal agencies. The discussion should also explain whether the agreement changes the proposed project and how the agreement will be integrated into the operational controls for the project.	Section 3.4.2 and Appendix D of the FEIS have been revised on the discussion of monitoring and mitigation that has been proposed for the agency-preferred alternative. Pre- and post-construction monitoring plans, if required, will be developed in coordination with the NMFS as part of the ESA Section 7 consultation.
0178-025	Ongoing negotiations between Vineyard Wind, the Rhode Island Fisheries Advisory Board and the Rhode Island Coastal Resources Management Council (RICRMC) regarding project design, construction, operation and mitigation are scheduled to conclude following the close of the comment period for the DEIS...BOEM staff has made it clear during interagency conversations and at recent public hearings that the conditions of the RICRMC approval would be adopted by BOEM and made binding on the project. EPA reserves the right to supplement or modify our comments on the DEIS with consideration given to the outcome of these discussions/negotiations. We would also appreciate the opportunity to participate in interagency discussions regarding implementation of any conditions related to these negotiations that result in project modifications.	Thank you for your comment.
0179-001	Much more studies need to be done BEFORE a project/problem of this size happens... The potential impact of energy infrastructure on the areas ecosystem should outweigh any short term corporate profits...Migration through this lease area happens for whales, dolphins, turtles, sharks, squid, lobsters, crabs, etc...Maybe install only 5 per year per lease before opening Pandoras box.	Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. Additional mitigation and monitoring measures may arise from consultations and coordination with Federal and State resource agencies. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0180-001	Having participated as a resident in Yarmouth, MA Town Hall discussions with Vineyard Wind (VW), I was impressed by the extent to which VW always reached out to the residents, businesses and environmental organizations to listen and act in behalf of the community and in the interest of our environmental well-being.	Thank you for your comment.
0180-002	...fishermen are naturally concerned about changes to their fishing grounds however they may not be recognizing that their greatest concern is not from the impact of wind turbines but from the accumulating effects of burning fossil fuels. I have attached one of multiple professional studies (May 2018 Inside Climate	Thank you for your comment.

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	News) that explains the impact that this global emergency is having on our marine life and consequently the the fishing industry.	
0180-003	Offshore wind technology is decades old, tried and true and one of the most significant contributors to clean energy.	Thank you for your comment.
0181-001	The economic impact of this lease to fisheries does not use the best data available. It cherry picks the right data to undervalue the number of fisheries & fisherman that could be/ or will be affected...trying to rush this energy infrastructure in without understanding the impact could have done unimaginable damage...A cautious approach SHOULD outweigh a rush to collect tax incentives.	Section 3.10.1 of the FEIS has been revised to include reliable and accurate data from multiple sources, including VMS and VTR data. BOEM acknowledges that both types of data collection methods have different limitations and advantages and that analysis is constrained by data availability. Data sources that are included in Section 3.10.1 of the FEIS are revenue intensity data (available publicly at https://www.boem.gov/Renewable-Energy-GIS-Data/); fishing revenue and landed pounds data by species, port, gear type, and state provided by NOAA; data from the addendum to “Spatiotemporal and economic Analysis of Vessel Monitoring System Data within Wind Energy Areas in the Greater North Atlantic” prepared by the RI DEM; as well as results from the “Rhode Island Fishing Value in the Vineyard Wind Construction and Operations Plans Area” also prepared by the RI DEM.
0182-001	my biggest problem was with the original cable landing in Lewis Bay... the Lewis Bay estuary...is a relatively small and shallow estuary that only has one small area for the tide to both come in and go out. Unlike the the alternate landing area, Covelles beach, that is deeper water and is wide open with no restrictions for the tide to flow in and out freely. The narrow area for the tide to ebb and flow will cause the silt, in the Lewis Bay estuary, to stay suspended in the water column.	Section 2.5 of the FEIS has been included to identify the agency-preferred alternative.
0182-002	This silt has the potential to smother the shellfish... in Lewis Bay. The cable route is directly through the scallop beds and quahog flats. It also goes very close to other commercial quahog flats as well as mine and a few other oyster farms.	Section 2.5 of the FEIS has been included to identify the agency-preferred alternative. Section 3.3.6.3 of the DEIS discussed potential impacts on shellfish in Lewis Bay; therefore, no changes to the FEIS were necessary.
0182-003	Covelles beach does not have any commercial shellfishing or any oyster farms that would be affected by the installation of the cables.	Section 2.5 of the FEIS has been included to identify the agency-preferred alternative. Section 3.4.5 of the DEIS discussed fishing spots near Covell’s Beach; therefore, no changes to the FEIS were necessary.
0182-004	There are several other species that live in and breed in the bay like flounders and horseshoe crabs. Not only will they be displaced by the cable installation but the silt could also smother their eggs when they breed.	Section 2.5 of the FEIS has been included to identify the agency-preferred alternative.
0182-005	There are other issues that have not been properly studied like the potential of electrolysis or emf from the cable. If electrolysis does occur it has the potential to destroy any metals that are in the water including the boats motors, chains, moorings, and oyster cages which I personally have over \$60000 worth on my farm alone.	The revised FEIS discusses the potential of EMF from the cable in several places in Chapter 3 and Appendix A, particularly in Section 3.3.2 of the FEIS for effects on commercially important species. There is no credible information to indicate any risk of electrolysis from the technology in the proposed Project.
0182-006	Vineyard wind stated that the cables become brittle at lower temperatures... Do we have to worry about brittle cables all winter long, when there is a potential of ice covering the waters surface, making it almost impossible for Vineyard Wind	The submarine export cables would be installed at or below the seabed where temperatures do not reach freezing conditions (https://www.boem.gov/Munitions-and-Explosives-of-Concern-Survey-

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	to dig up the cables to make repairs. If they do have to dig up any section of the cable, that would cause all the problems with the silt once again.	Methodology-and-In-field-Testing-for-Wind-Energy-Areas-on-the-Atlantic-Outer-Continental-Shelf/). A number of factors are involved when conducting cable repairs, and best practices include the consideration of weather conditions (DNV-RP-J301).
0182-007	The potential of destroying an area that is rich in shellfish and a great tourist destination will be a financial blow to the town. If the shellfish are smothered by silt it would put myself and the other oyster farmers and commercial shellfishermen out of business. If there continues to be no shellfish then people would stop purchasing recreational and commercial shellfish permits which would be a loss of revenue for the town. And the Cape definitely needs tourists.	The proposed cable transition from offshore to onshore would be through HDD technique as discussed in Section 2.1.1.1 of the FEIS. The use of HDD will minimize the potential effects on shellfish at the landfall location.
0183-001	While... even the smallest project undertaken in the ocean..will have an impact on the environment, I am more confident than ever in offering my full support for it...if we don't move forward with cleaner energy production projects like these as soon as humanly possible, from a personal standpoint the ocean will inundate my hotel faster than it already is and, beyond my personal stake, the damage to the health of the world's ocean's will be far far worse than the impact projects like these will create.	Thank you for your comment.
0183-002	The folks at Vineyard Wind have worked hard to provide transparency, consider the public's input and take the steps they can to proceed with this project in an environmentally responsible manner.	Thank you for your comment.
0184-001	The impact these turbines will have on the commercial fishing industry will last for decades. The potential for RI squid fishermen to be put out of business is looming large over their heads.	Sections 3.10.1 and 3.10.2 of the FEIS have been revised for a discussion of potential impacts on fisheries.
0184-002	A select group of commercial fishermen are bidding for some of the wind industry's money..30 million dollars doesn't even put a dent in the financial impact of losing 80 miles of fishing grounds.	Sections 3.10.1 and 3.10.2 of the FEIS have been revised for a discussion of potential impacts on fisheries.
0184-003	The worst part is our voices [commercial fishermen's] are silenced. Only a select few are included in comments presented to BOEM.	Section 1.1 of the DEIS contained information on the background of the process and project. Appendix C (formerly Chapter 4) of the FEIS has been updated with information on the coordination and consultation process to date for the proposed Project.
0184-004	This is...a corporate ocean real estate grab funded by government subsidies to line the pockets of a few american corporate interests, while selling off portions of our ocean resources to foreign wind companies.	Thank you for your comment.
0185-001	The settlement offers to fisherman are a joke, 30 million is quite a sad statement, how do you value losing 80 miles of area... the skimpy little compensation package you offered that doesnt cover a typical day in Pt. Judith is gonna cover these guys for a year???	Section 3.10.1 of the FEIS has been revised to include additional squid data. Section 3.10.2 of the FEIS has been revised to include a discussion of displacement and potential conflict over fishing grounds and voluntary compensation. Section 3.10 of the FEIS has been updated to include details of mitigation and monitoring measures relative to commercial fisheries, including voluntary financial compensation. Appendix D of the FEIS has also been updated

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		to include modifications and/or additional mitigation and monitoring measures. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0185-002	The lack of proof that the windmills are safe to sea life, there is no studies to show.	Thank you for your comment.
0185-003	Also what happens when you put OUR FISHERMEN OUT OF WORK? There a[re] zero negative comments ever shown, especially from fishermen our voices are ailed.	Thank you for your comment.
0186-001	We submit this Comment to inform you that we strenuously object to the disruption to the seabed of Lewis Bay and the burial in Lewis Bay at any depth of transmission cables for the purpose of connecting wind generated electrical energy to shore.	Section 2.5 of the FEIS has been included to identify the agency-preferred alternative.
0186-002	The plowing and burial of transmission cables under the seabed of the Lewis [Bay] will result in irreparable harm to our oyster farms. The disruption caused by plowing and burial of transmission cables will result in sand, sediment or silt smothering and choking the oysters... If even a small amount of sediment is found inside the oysters, this will cause harm to the brand quality of our oysters. We are at risk of losing our wholesale customers if the quality of the oysters is diminished by even the slightest presence of sand or silt inside the oyster.	Section 3.3.5.3 of the DEIS discussed the impacts of dredging and cable burying, and acknowledged the potential for moderate impacts. Section 3.2.2 of the FEIS provides additional information regarding impacts of dredging and cable burying. As specified in the SEIS and FEIS, the proposed Project would utilize Covell's Beach and not Lewis Bay.
0186-003	The impact of the electromagnetism, heat, sound and vibration emanating from the industrial cables into the Lewis Bay estuary will have a detrimental impact on the growth pattern of our oysters. Vibrio is a concern; even a one-degree temperature increase could be problematic.	Section 3.3.5.3 of the DEIS provided a discussion of heat and EMF impacts from the submarine cable on benthic organisms, as well as measures to mitigate these impacts. Additional information has been added to Sections 3.2.1 and 3.2.2 of the FEIS.
0186-004	In the event of a tiniest leak of electricity into Lewis Bay electrolysis will occur and will cause damage to our aquafarm equipment.	Section 2.1.1.1 of the FEIS has been updated for a discussion of cable burial depth. A discussion of long-term monitoring of cable placement is provided in the updated Appendix D of the FEIS. There is no credible information to indicate any risk of electrolysis from the technology in the proposed Project.
0186-005	There are known failures of cables now in place in Nantucket Sound and there is a recent exposure of a cable off Block Island, R.I., requiring repairs....In the event repair to the cable in Lewis Bay is necessary, there will be no time to consider the protection of the 5 million oysters growing in Lewis Bay... The only way to protect the aquafarmers from this event is to not permit cabling in Lewis Bay from the inception of the Project.	Section 2.1.1.1 of the FEIS has been updated for a discussion of cable burial depth. A discussion of long-term monitoring of cable placement is provided in Appendix D of the FEIS.
0186-006	C. Electro Magnetic Field and Electrolysis The possibility of electrolysis causing harm to our metal equipment is a major concern.	Section 2.1.1.1 of the FEIS has been updated for a discussion of cable burial depth. A discussion of long-term monitoring of cable placement is provided in Appendix D of the FEIS.
0186-007	D. Previous Suggestions of Remediation by Vineyard Yard LLC. Are Inadequate. ... Vineyard Wind representatives talked about possible preventive measures.	Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. Additional mitigation and monitoring measures may arise from consultations and coordination with Federal

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	<p>a. Installing silt curtains while cabling work is being conducted... The flow of the unsettled silt and sand is unpredictable and there are no assurances that This concept will work.</p> <p>b. Moving oysters physically off the Lewis Bay grants. This method is in use successfully where oyster farms are located in intertidal sea beds which go dry at low tides. The oysters are accustomed to being exposed to air and sun. The oyster farms in Lewis Bay are in subtidal locations, and the oysters may be damaged by being removed from water... Southeastern Massachusetts Aquaculture Center (SEMAC) has advised us to never remove the oysters for an extended period of time due to high mortality rates associated with taking the oysters out of the water.</p> <p>c. Vineyard Wind has suggested that it will conduct its work in Lewis Bay during the month of November. At that time of year, our oysters are still growing and are very susceptible to harm. Our oysters are dormant during the months of January and February. However, Burial of transmission cables cannot be conducted at that time because Lewis Bay is the breeding ground for flounder during that time.</p>	and State resource agencies. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0186-008	Furthermore, during the EFSB process, there was a suggestion that laying the cables in the coldest of months is not practicable because the cables are not pliable in freezing temperatures. It is unclear whether freezing temperatures affect the protective coating covering transmission cables or if any further problems exist due to freezing weather. This issue needs to be examined and understood.	It is in Vineyard Wind’s best interest to ensure that their cable is adequately protected. The submarine export cables would be installed at or below the seabed where temperatures do not reach freezing conditions (https://www.boem.gov/Munitions-and-Explosives-of-Concern-Survey-Methodology-and-In-field-Testing-for-Wind-Energy-Areas-on-the-Atlantic-Outer-Continental-Shelf). A number of factors are involved when conducting cable repairs, and best practices include the consideration of weather conditions.
0186-009	E. AQUAFARMS IN THE LEWIS BAY ESTUARY ARE AN INTEGRAL PART OF THE TOWN OF YARMOUTH NITROGEN ABATEMENT PROGRAM... the nitrate content of Lewis Bay is reduced each year in large part because of the presence of the oyster aquafarms. The Town of Yarmouth has encouraged aquafarms in the Lewis Bay to help bring nitrogen levels to safe standards as established by Massachusetts regulations... This is well documented in the Cape Cod Commission study of estuaries and nitrogen abatement...	Thank you for your comment.
0187-001	... the proposed Wind Energy Facility Offshore Massachusetts....A solution for clean energy to the people of Massachusetts....	Thank you for your comment.
0188-001	The site chosen is over 14 miles south of Marthas Vineyard and Nantucket, and thus minimizes visual impact.	The DEIS addressed this in Section 3.4.4.3. Therefore, no change to the FEIS is warranted.
0188-002	This site was identified after a 5-year stakeholder and community engagement process with the Federal government which included representation from all six towns on Marthas Vineyard and the Marthas Vineyard Commission.	Section 1.1 of the DEIS contained information on the background of the process and project. Appendix C (formerly Chapter 4) of the FEIS has been updated with information on the coordination and consultation process to date for the proposed Project.

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0188-003	Suggested alternative actions to reduce number of turbines and move preferred cable landing to Barnstable have already been incorporated into project plans.	Thank you for your comment.
0188-004	Vineyard Wind has committed \$3 million to advancing technologies and programs to ensure offshore wind can coexist with marine mammals.	Thank you for your comment.
0188-005	And throughout the process, Vineyard Wind has been an accessible, transparent and responsive community partner.	Thank you for your comment.
0188-006	Vineyard Winds 800 MW offshore wind project will reduce CO2 emissions by approximately 1,680,000 tons per year...Even more importantly, this will be the first utility-scale offshore wind project in the country and serve as a catalyst for an entire new industry in the region and nationwide.	Thank you for your comment.
0188-007	The Mass Dept of Energy Resources (DOER) determined Vineyard Wind will save Massachusetts ratepayers \$1.4 billion over 20 years and provide over 3,6 00 full-time equivalent jobs over the life of the project.	Thank you for your comment.
0189-001	There has been environmental damage from wind farms in Ireland and Scotland...We will have similar damage...from silt.	Section A.8.2 in Appendix A of the FEIS includes an assessment of the potential effects of water quality as a result of turbidity/sediment suspension.
0189-002	We will also change the ecosystem on the bottom of the ocean, which has already happened in Rhode Island from the 5 turbines that have been installed.	The impacts of altered seafloor habitat and a plan for monitoring potential effects are discussed under Section 3.2.2 of the FEIS.
0189-003	The mitigation plan is a joke and offers no real compensation for fishermen.	Section 3.10 and Appendix D of the FEIS have been revised to include the Vineyard Wind’s voluntary established gear loss and revenue compensation funds for fishing interests based in Rhode Island, Massachusetts, and other states. Please see Section 3.10 and Appendix D of the FEIS for more details on the measures.
0189-004	The decommissioning plan is even worse and I’m more surprised the environmentalists aren’t up in arms over it.	Section 2.1.1.3 of the FEIS includes a discussion on decommissioning. Chapter 3 and Appendix A for each resource area describes the potential effects associated with decommissioning of the proposed Project.
0190-001	Due dilligence has been put in from company representatives on multiple levels to ensure the construction will not harm aquatic life and the fishing industry.	Thank you for your comment.
0190-002	Neighboring residents not only fully support the project but furthermore are excited and confident that the project will generate a large portion of our state-mandated clean energy threshold, a growth in economic development with the creation of the blue economy corridor, assist local colleges and universities to be destination schools for the industry and much more.	Thank you for your comment.
0191-001	Dredging in Horseshoe Shoals for transmission is likely to impact whelk, a significant resource for Vineyard fishermen. Impacts to the whelk resource of the proposed dredging should be thoroughly explored in the FEIS...The DEIS all but neglects the whelk fishery; significant to Martha’s Vineyard fishermen. On page 3-168, there is a very brief description of the fishery. Included is the inaccurate statement “This fishery operates entirely within state waters, with a plurality of the total catch being taken from Nantucket Sound”. In fact, the significant fishing	Section 3.10.1 of the FEIS has been revised to clarify that Project activities are not expected to impact the whelk fishery.

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	grounds on Horseshoe Shoals lie within the “donut hole” of federal waters encompassing most of Nantucket Sound. There is no state oversight.	
0191-002	Although the DEIS includes considerable data from the larger ports, the data on Martha’s Vineyard and Nantucket is absent. The FEIS should include much more on Martha’s Vineyard fishing.	Section 3.10.1 of the FEIS has been revised to include a discussion of fishing trips originating from Tisbury and Nantucket.
0191-003	Martha’s Vineyard’s economy depends upon the vacation industry, which depends on maintaining the picturesque fishing fleet of small boats. The iconic small boat fishermen and fisherwomen of Martha’s Vineyard need assurance of coexistence and/or appropriate mitigation. The FEIS should include much more data and should thoroughly explore impacts, possible avoidance of conflict, and a mitigation plan of substance.	Sections 3.6.1 and 3.9.1 of the FEIS have been updated to include acknowledgement of fishing fleets as a source of economic activity and visitor attraction. Further discussion of impact on commercial and recreational fisheries, including monitoring and mitigation proposed relative to these resources are provide in Section 3.10.2 as well as Appendix D of the FEIS.
0191-004	The Martha’s Vineyard fishing fleet consists mostly of small boats, often manned by a single operator with no crew. In order for fishing to continue within the WDA during operation, there needs to be assurance that a small boat with an individual operator will be able to continue as before the development. A statement from USCG that the boats may still use the area, as long as they carry crew, would not help. Will these small boat owners be able to safely continue to ply their trade? Will they be able to purchase insurance for the extra liability? Impacts and mitigation should be thoroughly addressed in the FEIS.	Concerning vessel access to the WDA, it is worth mentioning that temporary limited or restricted access areas (safety zones) may be set up around active construction areas, where applicable. However, note that BOEM does not have the authority to restrict access to the WDA during operations. In addition, the USCG has stated that they do not intend to restrict access to the WDA during operations. The USCG’s authority to establish safety zones only extends to the boundary of the territorial waters of the United States, which is 12 nautical miles from shore and outside the WDA. Therefore, while Vineyard Wind’s supplemental navigational risk assessment shows that it is technically feasible to navigate and maneuver fishing vessels and mobile gear through the WDA, BOEM is cognizant that maneuverability within the WDA may vary depending on many factors including vessel size, fishing gear or method used, and or by environmental conditions. Sections 3.10.2 and 3.11.2 of the FEIS provide additional discussions.
0191-005	Construction impacts will restrict navigation in some fishing grounds short-term. This short-term conflict may result in loss of income, mortgaged boats or homes by those boat owners. There should be a mitigation plan with substance. Data on Martha’s Vineyard fishermen will be crucial to a fair mitigation plan.	Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. Additional mitigation and monitoring measures may arise from consultations and coordination with Federal and State resource agencies. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0191-006	During operation of the wind generation facility, there may be impacts on the radar used by the small boats, particularly in fog or at night. Impacts need to be thoroughly addressed in the FEIS.	Section 3.4.7.3 of the DEIS included a discussion of impacts on radar and associated mitigation measures; therefore, no changes to the FEIS are warranted. Section 3.11.2 of the FEIS has been revised to include an expanded discussion of impacts on navigation.
0191-007	Some mitigation measures for conflicts of [fishing] operation have been explored and are included in the proposal... Impacts should be avoided wherever possible. Even with appropriate avoidance of conflict, it seems inevitable that there will be some negative impact. There should be a mitigation/compensation plan with	Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.

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	substance. As such, there should be much more baseline data on Martha's Vineyard fishing.	Data for Martha's Vineyard is very limited. Information by port and state is provided in Section 3.10.1 of the FEIS. However, because Martha's Vineyard has very small ports, quantitative fishing data is confidential. Additionally, the focus of the Section 3.10.1 of the FEIS is to characterize fishing in the WDA, regardless of where fishing vessels are homeported.
0191-008	On January 22, 2019, Vineyard Wind and a number of advocacy groups signed an M.O.U. for protection of the Northern Right Whale: Vineyard Wind – NGO Agreement January 22, 2019. This agreement should be included in the FEIS as a significant mitigation measure.	Section 3.4.2 and Appendix D of the FEIS have been revised for a discussion of monitoring and mitigation that has been proposed for the agency-preferred alternative. Pre- and post-construction monitoring plans, if required, will be developed in coordination with the NMFS as part of the ESA Section 7 consultation. Further discussion of impact on North Atlantic right whales is provided in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ .
0191-009	Because [Northern Right Whales] are seriously threatened with extinction, protection should rise above avoidance of a core habitat... The best protection for these whales is a temporal-based avoidance of ship strikes and other construction impacts. The Marine Mammal Protection Act requires vessels to cease activities when one of these whales is sighted. MVC recommends the further protection of employing passive acoustic monitoring to inform the crew of nearby Right Whales... The Vineyard Wind – NGO Agreement January 22, 2019 includes such protection.	Section 3.4.2 and Appendix D of the FEIS have been revised for a discussion of monitoring and mitigation that has been proposed for the agency-preferred alternative. Pre- and post-construction monitoring plans, if required, will be developed in coordination with the NMFS as part of the ESA Section 7 consultation.
0191-010	... the waters south of the Vineyard do support a resident summer population of Finback whales. It is more feasible to avoid Finback impacts by avoiding the time and space where they spend the summer. Details are included in the Wind Energy Plan for Dukes County and references identified therein.	Section 3.4.2 of the FEIS has been revised in coordination with NMFS and includes the proposed mitigation and monitoring measures for marine mammals. Furthermore, Section 3.4 and Appendix D of the FEIS include the draft Incidental Harassment Authorization measures proposed to be issued under the MMPA. Further discussion of impact on fin whales is provided in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ .
0191-011	Muskeget Channel is known to be a very dynamic environment, to say the least. The FEIS should explain how the cable is proposed to remain buried. Impacts of loose cable, and proposed response, should be identified in the FEIS.	Section 2.1.1 of the FEIS has been updated to address cable burial risk for the proposed Project. The OECC would have a target burial depth of up to 5-8 feet (1.5-2.5 meters).
0192-001	I fully support the establishment of off shore wind in general and the Vineyard Wind proposal specifically. They have done more than their due diligence to examine the impact that this will have on our ocean.	Thank you for your comment.
0192-002	In addition, they have had extensive communication with the fishing industry and have made reasonable accommodations for operational safety standards. Incidentally, these standards should have been negotiated by the government and not one specific vendor, but I applaud Vineyard Wind's efforts to do that work as well.	Thank you for your comment.

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0192-003	When we look at all of the negative impacts of fossil fuel based electricity production, ocean-based wind is a far less impactful method of generation. Any negative impacts of this project are far outweighed by it's benefits.	Thank you for your comment.
0193-001	I write on behalf of of the Madaket Residents Association, which represents 160 members from the west end of Nantucket... We strongly support todays letter of comment from the Town of Nantucket regarding VinWin. We wish to add our significant concerns about its impact upon the quiet rural character of our neighborhood, Madaket, especially our beaches...Our absolutely clear view shed is an Important asset not just to our residents, but to the entire Island of Nantucket...The mitigation steps we ask for are minor changes involving paint color, turbine lighting and the move (not removal) of the first few rows of turbines to the back of the lease, all noted in more detail in the Town of Nantucket letter.	Section 3.9.2 of the FEIS has been revised to address ADLS lighting. Section 2.1.1.1 of the DEIS addressed color; therefore, no changes to the FEIS were necessary.
0193-002	We also request that scientific visual simulations, taken both at beach level and local elevations such as Sanford Farm, at different times of day and in varied weather, be submitted by VinWin. The current simulations are absolutely inadequate to show the actual impact of the turbines, which is necessary to any informed decision about mitigation.	As part of the COP submission, Vineyard Wind prepared visual simulations of what their proposed Project would look like from various locations. These simulations were prepared as part of the larger Visual Impact Assessment which is Appendix III-H.a of the COP (Epsilon 2020d). In addition, Vineyard Wind prepared a nighttime video simulation and (Summer, Fall) daytime video simulations to show what the proposed offshore wind facility would look like under various conditions. Section 800.4(b)(1) of the Section 106 regulations states that federal agency officials shall make a "reasonable and good faith effort" to identify historic properties. The visual simulations can be viewed at the following link: https://www.boem.gov/vineyard-wind/ The video simulations can be found at: https://www.boem.gov/Night-Visual-Simulation-Video/ https://www.boem.gov/Day-Visual-Simulations-Videos/
0194-001	...[Fisheries Survival Fund] does not believe BOEM's leasing procedures adequately account for the impacts to the scallop fishery --- or any commercial fishery, for that matter --- from offshore wind energy development.	Section 3.10 of the FEIS includes a discussion on commercial fisheries.
0194-002	Indeed, it defies both the world-wide experience with offshore wind energy development projects and ordinary common sense to seek claim that developmetn of these massive projects will not have profound ecological impacts on ocean and benthic habitats, including the habitat for commercially important fish species.	Section 3.10 of the FEIS includes a discussion on commercial fisheries.
0194-003	It is equally implausible to contend these major offshore developmetns, whether considered one at a time or cumulatively, will not have major impacts on established marine fisheries in the area.	Section 3.10 of the FEIS includes a discussion on commercial fisheries.
0194-004	Further, slicing and dicing wind energy development phases and projects, so as to segment important [NEPA] analysis, is contrary to NEPA's letter and spirit. Nor	Appendix A and Chapter 1 of the FEIS has been updated in response to public and stakeholder comments as well as on-going consultation with resource

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	is that blinkered approach consistent with the outer Continental Shelf Lands Act, as amended.	agencies to include additional projects, and the SEIS was developed in response. Additionally, Appendix A has been updated to outline the effects assessment methodology utilized in the development of the SEIS and FEIS. The appendix and Chapter 1 also outlines the other potential offshore wind energy projects that are considered reasonably foreseeable. The assessment of impacts is included in each resource-specific section in Chapter 3 and Appendix A.
0194-005	...FSF adopts the thoughtful and detailed comments on the Vineyard Wind COP submitted by the Responsible Offshore Development Alliance (RODA). RODA painstakingly details the work that is required to be done as a matter of law and science to make reasonably well-informed decisions regarding the siting, construction and operations of these wind projects.	Thank you for your comment.
0195-001	I have been a full time year round commercial fisherman since I graduated high school in 1988. I primarily fish for lobsters and whelks, as well as scallops, crabs and clams. This wind project will have incredible adverse effects on not just my ability to continue to make my living from our ocean and help feed this country, but thousands of others livelihoods as well. I strongly urge this entire project does NOT continue any further. The environmental impacts will be irreversible once this Pandora's Box is opened.	Section 3.10 of the FEIS includes a discussion on commercial fisheries.
0196-001	After review of the DEIS, I strongly encourage the Bureau of Ocean Energy Management (BOEM) to have a favorable review of that study and approval the DEIS with appropriate conditions to protect the interests of commercial fisheries stakeholders and to minimize environmental impacts of the projects. I support the proposed conditions to create a transit corridor through the lease area and to position the towers such that there is a minimum of one nautical mile between each tower. I also support to condition to orient the wind farm in a manner that reduces the potential risk of adverse impacts on commercial fishing vessels.	Sections 2.1.1.2 and 3.11.1 of the FEIS includes a discussion of the proposed transit corridors both within and south of the WDA. Section 2.1 of the FEIS includes a discussion of the Proposed Action and action alternatives and Section 2.5 of the FEIS includes a discussion of the agency-preferred alternative.
0196-002	The proposed Vineyard Wind project provides sustainable clean electricity at a very low price and will have a major positive economic impact on region and the Commonwealth of Massachusetts.	Thank you for your comment.
0196-003	Throughout the planning process, Vineyard Wind has been attentive to community input, particularly from fisheries and marine stakeholders, as well as organizations and individuals interested in protecting the marine environment.	Thank you for your comment.
0196-004	As you know, the commercial fishing industry is critical to New Bedford, therefore it is critical to promote co-existence and share stewardship of the ocean resources by fisheries industry and the offshore wind development community. I believe there is synergy between commercial fisheries and offshore wind development, including utilizing mariners and fishing crews to augment the offshore wind workforce.	Thank you for your comment.

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0197-001	The American Sportfishing Association (ASA) supports selecting project alternatives for Vineyard Wind’s Construction and Operations Plan (COP) that minimize impacts to (1) current and future use of the area by recreational fishery stakeholders (both private and charter), (2) fish population health (3) habitat that supports ecosystem function and (4) ongoing and future biological monitoring efforts.	Thank you for your comment.
0197-002	As stated in detail by many commenters, ASA is concerned about BOEM dismissing various impacts throughout the DEIS without proper analysis to support those conclusions. For example, BOEM indicates that various impacts from the COP are minor because similar unimpacted habitat exists around the selected wind development site. However, there are multiple adjacent lease blocks with planned wind energy projects for southern New England in the foreseeable future. Those project impacts would be additive and should be incorporated more thoroughly into the cumulative impact analysis.	BOEM has revised the list of reasonably foreseeable future offshore wind projects based on project progress since publication of the DEIS, and this information was included in the SEIS and carried forward to the FEIS. The list of reasonably foreseeable future offshore wind projects is included in Appendix A of the FEIS. Quantitative impact analysis is provided as appropriate in the specific resource sections within Chapter 3 and Appendix A of the FEIS.
0197-003	Additionally, the DEIS does not fully evaluate the potential impacts of electromagnetic fields emitted across the export cables which may have adverse impacts to the behavior and migration of benthic and demersal finfish species.	Section 3.3.2 of the FEIS has revised the discussion of EMF-related impacts on the little skate.
0197-004	ASA suggests reworking the DEIS to more thoroughly analyze potential impacts from the COP for the Vineyard Wind Project. Without the opportunity to consider further analyses, ASA suggests incorporating Alternative E which would minimize the project area through the use of the largest available wind turbine generators.	Section 2.5 of the FEIS has been included to identify the agency-preferred alternative.
0197-005	ASA recommends [that] time of year installation restrictions for construction activities in the Offshore Export Cable Corridor be guided by consultation with the Massachusetts Division of Marine Fisheries (MA DMF) to avoid impacts to spawning seasons, larval ingress, and juvenile recruitment to primary nursery habitats.	Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. Additional mitigation and monitoring measures may arise from consultations and coordination with Federal and State resource agencies. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0197-006	Additionally, ASA supports the use of horizontal direction drilling at landfall sites to minimize impacts to submerged aquatic vegetation, and other nearshore habitats that are critical for ecosystem function.	Sections 3.1.1 and 3.1.2 of the FEIS have been revised to include additional discussion of the potential impacts of HDD.
0197-007	ASA also supports the use of project Alternative B, eliminating the New Hampshire Avenue landfall site to avoid further impacts to the already sensitive Lewis Bay watershed.	As specified in Section 2.1 of the FEIS, the DEIS, and SEIS contemplated two Onshore Export Cable Routes (OECRs), with alternative options within each route; however, since the publication of those documents, Vineyard Wind has stated all necessary state and local permits for the Covell’s Beach landfall location have been acquired. Therefore, the Proposed Action (Alternative A) and action alternatives only contemplate the one landfall location, Covell’s Beach landfall and onshore route. Alternative B therefore is no longer evaluated as an action alternative in this FEIS. In addition, Section 2.5 of the FEIS has been included to identify the agency-preferred alternative.

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0197-008	<p>The DEIS indicates NMFS survey methodology may need to change to account for the inability to sample certain locations within the proposed wind development area. This potentially represents a significant issue as data obtained by the NMFS bottom trawl survey are critical to understanding the population dynamics of various species throughout the New England and Mid Atlantic regions. The NMFS bottom trawl survey represents a valuable long-term dataset and changes to its survey design may create uncertainty in the stock assessments that rely on this index. Additionally, ASA has similar concerns with potential impacts to the MA DMF’s spring and fall survey that has sampling locations within the proposed project area. Therefore, we recommend further consultation with MA DMF and NMFS to fully address any impacts to the respective trawl survey designs that would negatively impact the use of these datasets in the stock assessment process.</p>	<p>Section 3.12.2 of the FEIS has been revised for a discussion of potential impacts on fisheries surveys and Section 3.12 of the FEIS has also been revised for a discussion of the implications of impacts.</p>
0198-001	<p>The New York State Department of State (Department), as the administrator of the State’s federally-approved Coastal Management Program, offers the following comments regarding the Vineyard Wind Offshore Wind Energy Project Draft Environmental Impact Statement (DEIS) dated December 2018. Our comments include requests for BOEM and the applicant to address impacts to New York stakeholders raised in the DEIS and emphasize the importance of early and robust coordination between the Department and BOEM with respect to future lease area sales and construction and operations plans (COPs). Our comments also seek to improve coordination efforts with BOEM, particularly regarding submissions of consistency determinations and certifications to ensure New York’s participation in Coastal Zone Management Act (CZMA, 16 U.S.C. § 1456(c)) reviews for future offshore wind project development in this region.</p>	<p>Thank you for your comment.</p>
0198-002	<p>The DEIS identifies a range of potential impacts to New York’s coastal and ocean uses and resources using analyses created by the federal government or with federal data. For example, Section 3.4.5 of the DEIS identifies New York interests in the Massachusetts Wind Energy Area and Vineyard Wind Lease Area by acknowledging the regional setting of commercial fishing, highlighting the importance of the Montauk, New York fishing port in value and volume of commercial landings, and drawing attention to the fact that, on average, more for-hire recreational fishing trips to this area originate from Montauk, New York than any other state. The Department requests that BOEM address impacts to New York’s offshore uses and resources as identified in the DEIS through focused consultation with New York stakeholders.</p>	<p>Additional analysis and data were added to the Section 3.10.1 of the FEIS on For-Hire Recreational fishing; however, there is limited data on for-hire recreational fishing boats in the WDA. The COP further characterizes for-hire recreational fishing in the WDA.</p>
0198-003	<p>We request that BOEM carefully evaluate turbine and transmission placement to set an achievable and equitable precedent for future development in the region that minimizes effects and allows offshore wind development to co-exist with established ocean uses.</p>	<p>Thank you for your comment.</p>

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0198-004	Access to and from fishing grounds for all ports in the region will need attention and analysis to ascertain the best and most equitable solution to accommodating vessel transiting.	Sections 3.10.2 and 3.11.2 of the FEIS have been updated to further address port access.
0198-005	The Department looks forward to early engagement and coordination with BOEM on CZMA federal consistency determinations and certifications. Such coordination will provide New York the opportunity to review proposed lease sales and any COPs for projects in leased areas. This will allow New York State to most effectively review a project's effects on the State's coastal uses and resources for consistency with its enforceable policies. We are committed to working expeditiously with BOEM and affected states to responsibly site renewable offshore energy in the region.	Thank you for your comment.
0199-001	Recreational fishermen need ... guaranteed fishing access all the way to the base of the turbines	<p>Fishing activities within the WDA might be impacted to the extent access to the WDA is restricted; fishing gear is entangled with protections placed over cables or around foundations of WTGs or ESPs; and/or maneuverability restrictions within the WDA result in the displacement of fishing vessels.</p> <p>Concerning vessel access to the WDA, it is worth mentioning that temporary limited or restricted access areas (safety zones) may be set up around active construction areas where applicable. However, note that BOEM does not have the authority to restrict access to the WDA during operations. In addition, the USCG has stated that they will not restrict access to the WDA during operations. The USCG's authority to establish safety zones only extends to the boundary of the territorial waters of the United States, which is 12 nautical miles from shore and outside the WDA.</p>
0199-002	Recreational fishermen need ... a commitment to scientific monitoring of fisheries impacts, especially as more projects are proposed;	Section 3.10.2 of the FEIS has been revised to include a discussion of monitoring and mitigation measures proposed relative to commercial and recreational fisheries. These monitoring and mitigation measures are also discussed further in Appendix D of the FEIS.
0199-003	Recreational fishermen need ... continued engagement [from Vineyard Wind] with the fishing community to ensure we have input at every step of the project.	Many of the monitoring and mitigation measures discussed in Section 3.10.2 and in Appendix D of the FEIS were developed in coordination with a variety of stakeholder input, including commercial and recreational fisheries representatives
0199-004	The COMMERCIAL fisheries far outpace recreational lobbyist activity even though they don't contribute nearly as much to the national economy in jobs or revenue. PLEASE stop offering ridiculous amounts of money to appease the very industry that has destroyed the fisheries. This is the right and proper way to increase the Nation's environmentally friendly power supply. Ignore the lobbyists and do the right thing.	Thank you for your comment.
0200-001	As you know, the Port of New Bedford, Massachusetts has established itself in a national leadership position in both commercial fishing (as the nation's top-	Thank you for your comment.

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	<p>grossing port for nearly two decades) and in offshore wind energy (as the closest industrial port to the largest offshore wind reserves in the U.S., as well as home to the nation’s only specialized offshore wind staging terminal). And the Port of New Bedford’s momentum is accelerating. According to the latest economic research, between 2015 and 2018, the Port added 1,500 jobs, business revenue increased by nearly \$500 million, and the economic value of the Port jumped by nearly \$1.5 billion (bringing the total to \$11.1 billion in annual economic activity).</p>	
0200-002	<p>As Mayor of New Bedford for the past eight years, I have served during a remarkable period in the development of the Port, but also in the development of the offshore wind energy industry in the U.S. and abroad. During my tenure, I have devoted considerable time and effort to understanding the benefits and the potential impacts of the emergent U.S. offshore wind energy industry. I have closely studied the European offshore wind experience, and sought out interactions with a broad array of stakeholders. After this extended experience and much reflection, I have come to believe the most critical task of federal regulatory oversight (as well as state-level oversight) must be to create the conditions necessary for the U.S. offshore wind industry to mature and thrive while also putting in place a policy framework that protects, and even enhances, the competitiveness of existing commercial fishing operations. Commercial fishing operations represent the dominant commercial use of the federal waters slated for offshore wind energy development, so it is imperative that commercial fishing concerns receive the topmost attention of regulators. Establishing a policy framework that fosters a positive dynamic between a promising new industry and the most important existing industry should not be seen as a merely laudable goal for BOEM, it should be recognized as an essential prerequisite for the future success of both industries. BOEM’s approach to the Vineyard Wind Project, the nation’s first industrial-scale project, will establish many precedents and have major consequence for the relationship between the offshore wind industry and the commercial fishing industry.</p>	<p>Thank you for your comment.</p>
0200-003	<p>First, Vineyard Wind has demonstrated a sustained willingness to revise the Project to better address commercial fishing concerns in the areas of transit and navigation. While there is more work to do, progress is being made and I expect Vineyard Wind to continue to adjust its plans to lessen commercial fishing impacts. I also want to emphasize the importance of making sure all accommodations to commercial fishing regarding transit and navigation are codified in detailed, contingent approvals from BOEM and other regulators to assure that they are fully honored and the developer held accountable. That said, with continued effort from Vineyard Wind, backstopped by a responsible exercise of oversight authority from regulators, I am persuaded that the Project</p>	<p>Thank you for your comment.</p>

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	can be executed in way that delivers the promised wind power benefits, respects the needs of commercial fishermen, and creates a significant economic opportunity for the City of New Bedford, the Commonwealth of Massachusetts, and our nation.	
0200-004	Mitigation is a second major area of concern for the commercial fishing industry, and here Vineyard Wind is likewise taking important steps which I expect to continue. It also bears repeating that any mitigation commitments to commercial fishermen and shore-side businesses should be codified in detailed, contingent approvals from BOEM and other regulators to assure that they are fully honored and the developer held accountable.	Thank you for your comment.
0200-005	Fisheries and Offshore Wind Collaborative Fund: First and foremost, regulators and developers should share a collective goal of keeping fishermen fishing within lease areas. Dedicated funding from the offshore wind industry is essential to achieving this goal because it would make possible the development of innovative fishing gear and techniques that reduce the risks to fishermen and reduce potential damage to fishing gear and vessels (as well as damage to subsea cables associated with wind farms). With a Collaborative Fund in place, fishermen interested in experimenting with new types of gear and methods of fishing within lease areas will have an opportunity that might not otherwise be available. The structure of the Fund—managed by an independent entity and led by subject matter experts from both fishing and offshore wind backgrounds—would ensure that resources were allocated wisely. And, over time, the Fund would create best practices that can be replicated within wind farms in other areas, as the industry grows. In sum, the Collaborative Fund will ensure fishermen can continue fishing within lease areas while mitigating damage, liability, and loss to fishermen and offshore wind operators. As this mitigation component might apply to the Vineyard Wind Project, one could envision an approach similar to Vineyard Wind’s Rhode Island mitigation proposal. Vineyard Wind has committed \$23 million over the life of the project to the Rhode Island CRMUs Ocean SAMP. That model, as applied to Massachusetts, would simply be adapted to focus on boosting innovation and profitability in the fishing industry through the development of improved fishing vessels, gear, and technology.	Section 3.10 and Appendix D of the FEIS have been revised to include the Vineyard Wind’s voluntary established gear loss and revenue compensation funds for fishing interests based in Rhode Island, Massachusetts, and other states. Please see Section 3.10 and Appendix D of the FEIS for more details on the measures.
0200-006	Direct Fisheries Mitigation Fund: As for the second mitigation component, the New Bedford Framework would mirror Vineyard Wind’s Rhode Island mitigation proposal. It would base mitigation payments on lost fishing “value” (as opposed to “effort”), and would establish a trust from which mitigation payments would be made to eligible fishing businesses. The mitigation plan would also include a permit or boat buyback mechanism for those fishermen who decide to stop fishing on account of wind farm development. In its capacity as the	Thank you for your comment.

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	<p>“fisheries representative” to several developers, the New Bedford Port Authority has already introduced this idea into discussion as an approach that offers cost advantages and other benefits. In my view, a permit or boat buyback mechanism is one of the most valuable measures that could be taken toward ensuring the long-term coexistence of the offshore wind and commercial fishing industry. Simply put, if a commercial fisherman doesn’t think they can fish in an area, they should not have to. This pragmatic approach creates a future where developers interact with fishermen that believe (if also given adequate access to supports like the Collaborative Fund and training programs) they can coexist, even prosper, alongside the offshore wind industry.</p>	
0200-007	<p>Fishing Access and Training Programs: Lastly, I see great value in a direct partnership between the offshore wind industry (both developers and supply-chain companies) with the New Bedford Port Authority in a joint initiative to fund Access & Training Programs that support the entry of new fishermen and the training of veteran fishermen. These programs would go a long way toward lessening the cost and risk to young fishermen attempting to enter the industry and help existing commercial fishermen learn how to operate within wind farms. Programs could focus on providing training and technical assistance in operating a small business and marketing, apprenticeships, supporting the construction of port infrastructure that supports fishing, and other innovative programs that encourage and support new entry and opportunities for commercial fishermen. The question of where geographically to direct such investments (and mitigation more generally) is an important one. The New Bedford Framework proposes that Vineyard Wind (and subsequent developers) target funding to New Bedford based on the Port’s status as the dual epicenter of commercial fishing in Massachusetts and the U.S. East Coast. Consider, for example, that virtually all Massachusetts landings of fish from the Massachusetts and Rhode Island offshore wind lease areas, as well as the New York call areas, are New Bedford landings, according to the oft-cited Rhode Island DEM study of fishing activity in these areas from 2011-2016. In the case of the Vineyard Wind lease area, 88% of the Massachusetts landings were in New Bedford. The DEM study attributes no landings at all from the Vineyard Wind lease area to Gloucester, Boston, or any other ports north of Cape Cod.</p>	Thank you for your comment.
0201-001	<p>Access: Recreation anglers must be able to fish up to the base of turbine foundations to take advantage of the new habitat that will be created by offshore wind power development. We understand access may be limited during construction.</p>	<p>Section 3.9.2 of the FEIS has been updated on access to the WDA during operation. Access to the WDA is also addressed in Section 3.11.2 of the FEIS. While some temporary access restrictions will be required during construction and routine maintenance, access to the WDA and OECC will not be restricted during operations. Additionally, commercial and recreational fishing methods may need to change.</p>

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0201-002	Public Input: Recreational anglers must be engaged early in the planning process for offshore wind power development. Clearly communicated opportunities to provide input on siting, permitting, access and other issues can avoid future conflicts.	Appendix C of the FEIS has been updated for the public input process that occurred for the development of the EIS.
0201-003	Science: Fisheries research before, during and after wind turbine construction is essential for monitoring impacts to species of interest to recreational anglers. Study results should be publicly available and regularly communicated to our community.	Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. Additional mitigation and monitoring measures may arise from consultations and coordination with Federal and State resource agencies. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0202-001	...the EIS states that the turbines will be installed on monopole or jacket foundations. No mention is made of the alternative of mobile jack-up platforms for offshore wind turbines. This is a far superior and well-known solution. It should have been included in the analysis of alternatives because it has significantly less environmental impact than the proposed foundation technology.	As stated in your comment letter, the proposed foundation type is not commercially available to be used and therefore is not an alternative that can be considered in detail. Section C.5 in Appendix C of the FEIS under alternative wind turbine foundation types has been updated to indicate that mobile jack-up platforms are not feasible and therefore not carried forwarded.
0202-002	The serious concern is that this solution is not being considered because the patent for wind turbines on jack-up platforms, #US 7,163,355 B2, is held by an American company, Offshore Wind Power Systems of Texas (OWPST) This company is already developing an offshore wind farm near Brownsville, Texas. The European companies who expect to build the Vineyard Wind project cannot use the patented technology without paying for it. So, they are proposing inferior solutions, and they are not disclosing to the public or agencies that there is a better, American-owned solution. .The OWPST mobile jack-up platform for offshore wind turbines is called the “Titan”. The first Titan has already been built and is installed in the sea offshore Sweden, where it supports a meteorological tower. There are only TWO jacket foundations built for turbines in depth over 150 feet. The Titan jack-up design is environmentally superior to the European proposed foundations for several reasons...: • The Titan is fully assembled with a wind turbine on shore and floated out to the site with a tugboat. No specialized offshore wind construction ships are needed. This saves tens if not hundreds of millions of dollars on each project. These specialized ships do not exist in the USA yet and European ones may not be permitted in USA projects because of the Jones Act. • The Titan has almost no construction and installation impact. It stands on legs that press into the seafloor due to the weight of the platform. They do not need be driven into the seabed, as do monopole or jacket foundations. This eliminates pile driving noise. The legs can stand on any seabed type, and on uneven seabeds. Monopoles and jackets require that the seabed is leveled flat, destroying that habitat. • The Titan can be easily removed within a few days by a tugboat, if there are any concerns after installation. Monopoles and jackets must be cut out by divers with welding torches, operating from large ships, taking	As stated in your comment letter, the proposed foundation type is not commercially available to be used and therefore is not an alternative that can be considered in detail. Section C.5 in Appendix C of the FEIS under alternative wind turbine foundation types has been updated to indicate that mobile jack-up platforms are not feasible and therefore not carried forwarded.

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	weeks or months. This also has environmental impacts. Because of these advantages, the Titan foundation alternative must be considered in the FEIS.	
0203-001	Access: Recreational anglers must be able to fish up to the base of the turbine foundations to take advantage of the new habitat that will be created by offshore wind power development... Besides the unique and irreplaceable social value of these fisheries, any loss of access in this area would result in significant impact to the local fishing and boating economy. This is a high dollar fishery [pursued] by vessels accounting for hundreds of thousands of dollars of economic activity in electronics, gear, and tackle alone.	Section 3.9.2 of the FEIS has been updated on access to the WDA during operation. Access to the WDA is also addressed in Section 3.11.2 of the FEIS. While some temporary access restrictions will be required during construction and routine maintenance, access to the WDA and OECC will not be restricted during operations.
0203-002	We feel that the DEIS lacks thorough analysis of the potential impacts to recreational offshore fishing and urge BOEM to reconcile that via consultation with the International Game Fish Association, the American Sportfishing Association, and the NOAA Northeast Fishery Science Center. Throughout this process many individual anglers and recreational fishing organizations have requested formal confirmation that after construction, access in lease areas and around turbines and other structures would be treated in the same manner as oil rigs in the Gulf of Mexico.	Section 1.1 of the DEIS contained information on the background of the process and project. Appendix C (formerly Chapter 4) of the FEIS has been updated with information on the coordination and consultation process to date for the proposed Project.
0203-003	We request BOEM add firm language to the DEIS clarifying that the entire impact analysis is based on an expectation of total access to the wind farm area after construction. Our ideal approach to this issue would be for BOEM to make post-construction access a permit condition for all offshore wind-related structures. We feel offshore wind structures should fall under the existing US Coast Guard regulations regarding “aids to navigation.” This is established language that is well understood by both mariners and enforcement.	Section 3.9.2 of the FEIS has been updated on access to the WDA during operation. Access to the WDA is also addressed in Section 3.11.2 of the FEIS. While some temporary access restrictions will be required during construction and routine maintenance, access to the WDA and OECC will not be restricted during operations. Additionally, commercial and recreational fishing methods may need to change.
0203-004	Public Input: Recreational anglers must be engaged early in the planning process for offshore wind power development. Clearly communicated opportunities to provide input on siting, permitting, access, and other issues can avoid future conflicts.	Thank you for your comment.
0203-005	Science: Fisheries research before, during, and after wind turbine construction is essential for monitoring impacts to species of interest to recreational anglers. Study results should be publicly available and regularly communicated to our community.	Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. Additional mitigation and monitoring measures may arise from consultations and coordination with Federal and State resource agencies. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0203-006	Finally, we request a more comprehensive discussion of cumulative impacts on fisheries from continued offshore wind power development. It is essential we have a well-established framework for monitoring cumulative impacts now to avoid consequences for fisheries down the line.	Appendix A and Chapter 1 of the FEIS has updated the list of reasonably foreseeable future offshore wind projects considered in the FEIS, and the methodology presented was also included in the SEIS analysis. Section 3.9 of the FEIS presents the assessment of impact on commercial fisheries. In addition, Appendix D has been updated to include updated and new mitigation and

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		monitoring measures that have been considered. If the COP is approved, these measures (as well as others not listed) could become conditions of COP approval.
0204-001	We would like to express [The Falmouth Energy Committee’s] support for the Vineyard Wind project that is proposing to bring its cable to shore in Barnstable, MA from its lease area south of Martha’s Vineyard. This proposed project is well sited, has undergone years of environmental review and provides copious environmental and economic benefits to the region. These benefits are essential as we continue to shift our economy toward lower carbon sources. The 800 MW Vineyard Wind project is estimated to reduce 1,680,000 tons of CO2 emissions from the New England electrical system annually. This is a critical step in meeting our renewable energy goals and the Global Warming Solutions Act targets.	Thank you for your comment.
0204-002	We strongly support Vineyard Wind as a project that has demonstrated long-standing outreach to the communities throughout the region. The project has been actively engaged in creating ways to bring tangible benefits back to the people. Vineyard Wind’s project is estimated to save ratepayers over \$3.7 billion over the life of the project. Vineyard Wind has been working with the fishing communities and marine mammal scientists to create agreements that will help make the monitoring during and post construction an on-going element of how technology can integrate with the marine ecosystems.	Thank you for your comment.
0204-003	The Falmouth Energy Committee ardently supports the integration of offshore wind into our electricity grid and believes that Vineyard Wind is a project to make the US’s first foray into commercial-scale offshore wind generation a success. We hope that BOEM will also see the clear merits of the project and provide Vineyard Wind with the necessary permits to begin construction.	Thank you for your comment.
0205-001	This project will end the commercial fishing industry as we know it and fishermen in Massachusetts will suffer greatly. As a Massachusetts State permit holder we are afraid that we will no longer be able to make a living in state waters.	Section 3.10.2 of the FEIS includes the discussion of potential impact on commercial fisheries, including the mitigation and monitoring measures proposed to offset adverse impacts.
0205-002	The project is being rushed through and not enough time or resources have been spent studying the grounds, species, habitats, currently users, and the complex matrix of other seen and unforeseen negative impacts.	Chapter 3 and Appendix A of the FEIS includes the discussion of resource surveys that have occurred to date, as well as discussion of additional surveys to be conducted before, during, and after construction of the proposed Project.
0205-003	The “fishermen” liaisons are inadequate as are talks of mitigation. How is Vineyard Wind planning on compensating the commercial fishermen?	Section 3.10 and Appendix D of the FEIS have been revised to include the Vineyard Wind’s voluntary established gear loss and revenue compensation funds for fishing interests based in Rhode Island, Massachusetts, and other states. Please see Section 3.10 and Appendix D of the FEIS for more details on the measures.
0205-004	This project, being 25 times larger than any other in the world, should require 25 times more spent in the study of possible negative impacts. It should require 25	Thank you for your comment.

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	times more to be paid out for mitigation and to ensure no expense is spared to provide the best science to protect as much as [possible of] the natural way of life; including current human users, and the natural ecosystem. We can only imagine that with a project 25 times as great as the most destructive on the world’s seas, will be 25 times as damaging here on our own shores.	
0205-005	While attending yet another Vineyard Wind meeting recently, I was appalled to witness that many of the “positive” comments coming from the crowd were coming from organizations and groups that were directly profiting from the project. These biased opinions should be labeled for what they are, any individual, group, or organization that is profiting off the project in any way shape or form should have to disclose this information so the general public are aware of any and all potential conflicts of interests and biased views. With a project of this size and magnitude, transparency is an absolute must. This is our home and the project is backed with foreign money. Transparency is of the utmost importance.	Thank you for your comment.
0205-006	Just as this project will forever change the visual landscape of our Atlantic coast it will forever change the economic and traditional landscape of the Cape, my home. My husband is a fishermen, we are both direct descendants of the Mayflower and both our families histories are entwined with the sea. The story has evolved over 400 years and ends with Vineyard wind. What price can compensate the elimination of New England’s history, heritage, and traditions?	Thank you for your comment.
0205-007	How much is paid for the countless species that will be lost, the disturbance to migratory patterns, the loss of spawning grounds, and what is the cost of all the death and destruction that won’t be seen?	
0205-008	We need to be so careful and very aware of what the ACTUAL cost of “green” energy is and who will be paying that price, such as the endangered right whales and endangered sea turtles.	Section 3.4 of the FEIS includes a discussion of potential effects to marine mammals.
0205-009	The implementation of this project needs to slow down and we need to be so very careful that we are not trading one evil for another. ... As a society and a nation is awake and aware of the high price of negative impacts to our environmental, now more than ever, is the time to SLOW down and ensure we are creating solutions not more problems.	Thank you for your comment.
0206-001	[Residents of Nantucket] will be able to view the proposed wind farm from public and private vantage points on Nantucket island.	Section 3.9.2 of the FEIS has been updated to address visibility from residences and impact on residents from the proposed Project. In addition, Section 3.6.2 of the FEIS includes the material on impacts on residential property values.
0206-002	[Residents of Nantucket] routinely travel on, through, and over the coastal waters that would be affected by the proposed Project, including waters that support marine mammals and turtles.	Section 3.11 of the FEIS has been updated for a discussion on navigation and Sections 3.4 and 3.5 of the FEIS include a discussion on marine mammals and sea turtles, respectively.
0206-003	[Residents of Nantucket] also fish these same waters.	Thank you for your comment.

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206-004	In addition, [residents of Nantucket] have an interest in ensuring that the cultural and historic heritage of this part of New England is preserved and protected.	Thank you for your comment.
0206-005	Project-Related Hazards to Safety of Commercial Fishing Activities. The DEIS fails to sufficiently address the Project’s safety impacts on commercial fishing activities in and near the proposed wind turbine array. This impact arises, in part, from the applicant’s decision to align/orient the rows of wind turbines in a way that conflicts with the method and manner in which commercial fisherman fix their gear. This conflict would create significant safety hazards that would only worsen during bad weather or rough seas.	Section 3.10.2 of the FEIS has been revised to address this comment.
0206-006	In addition, it is now evident that the proposed Vineyard Wind project is only one of several that may be installed in this location, resulting in as many as 500 wind turbines, perhaps more. The cumulative safety impact on commercial fishing must be addressed, but so far the DEIS has ignored the issue.	Appendix A of the FEIS has been updated to include additional projects considered for impacts.
0206-007	Damage to Lobster, Squid, and Flounder Fisheries. While the DEIS touts the potential for the wind turbine foundations to provide new hardscape for mussels and certain species of sportsfish, the document fails to adequately assess the Project’s potential to damage commercial fisheries, including those for squid, lobster, flounder, and other fish that currently support the fishing economy in this part of New England.	<p>Potential impacts on commercial fisheries for squid, lobster, and flounder are discussed in the revised Section 3.10.2 of the FEIS.</p> <p>As part of the COP submission, Vineyard Wind prepared visual simulations of what their proposed Project would look like from various locations. These simulations were prepared as part of the larger Visual Impact Assessment which is Appendix III-H.a of the COP (Epsilon 2020d). In addition, Vineyard Wind prepared a nighttime video simulation and (Summer, Fall) daytime video simulations to show what the proposed offshore wind facility would look like under various conditions. Section 800.4(b)(1) of the Section 106 regulations states that federal agency officials shall make a “reasonable and good faith effort” to identify historic properties. The visual simulations can be viewed at the following link: https://www.boem.gov/vineyard-wind/ The video simulations can be found at: https://www.boem.gov/Night-Visual-Simulation-Video/ https://www.boem.gov/Day-Visual-Simulations-Videos/</p>
0206-008	Inadequate Visual Simulations. The DEIS does not include photo-simulations showing the aesthetic impacts of the Project. Instead, these are contained in a separate document (or, rather, in a separate file on the BOEM webpage). Nevertheless, the photo-simulations for Nantucket are inadequate. First, they are taken from the lowest elevation vantage points possible — on the beach — rather than on the bluffs or roadways along Nantucket’s western coast. As a result, the visual simulations provide a “best-case representation of what the wind turbines will look from Madaket and other key viewing areas. Second, the photosimulations should have assessed the visual impacts of the Project during	<p>Section 3.9.2 of the FEIS includes a description of the photo-simulations and panoramic photomontages. In addition, Section 3.9.3 of the FEIS presents the impact on visual resource from offshore wind projects.</p> <p>As part of the COP submission, Vineyard Wind prepared visual simulations of what their proposed Project would look like from various locations. These simulations were prepared as part of the larger Visual Impact Assessment which is Appendix III-H.a of the COP (Epsilon 2020d). In addition, Vineyard Wind prepared a nighttime video simulation and (Summer, Fall) daytime video</p>

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	<p>the period leading up to sunset, when the turbines would be seen as silhouettes along the horizon. This is important given that sunsets at Madaket and elsewhere along Nantucket’s western coastline is a major tourist attraction. Third, the photo-simulations only show the impacts of the proposed Project; they do not show the cumulative effects of the Project in combination with the other 400-500 wind turbines slated for installation immediately adjacent to the project site.</p>	<p>simulations to show what the proposed offshore wind facility would look like under various conditions. Section 800.4(b)(1) of the Section 106 regulations states that federal agency officials shall make a “reasonable and good faith effort” to identify historic properties. The visual simulations can be viewed at the following link: https://www.boem.gov/vineyard-wind/ The video simulations can be found at: https://www.boem.gov/Night-Visual-Simulation-Video/ https://www.boem.gov/Day-Visual-Simulations-Videos/</p>
0206-009	<p>Cumulative Analysis Ignores Wind Power Leases to the Immediate Southeast of Project. The DEIS asserts that it was not required to address the cumulative impacts of the proposed wind leaseholds to the immediate southeast of the project site because those lease rights had not been secured by any project applicant. According to the DEIS, it would be too speculative to assess the impacts of any potential wind projects at these locations. This assertion was always dubious from a NEPA perspective. Now, however, we are informed that the U.S. Government has, in fact, awarded the development rights for those leaseholds (including a second lease to Vineyard Wind LLC). Consequently, BOEM can no longer claim that projects on these leaseholds are not “foreseeable.” For this reason, the DEIS must include the impacts of these projects in its cumulative effects analysis.</p>	<p>BOEM has revised the list of reasonably foreseeable future offshore wind projects based on project progress since publication of the DEIS, and this information was included in the SEIS and carried forward to the FEIS. The list of reasonably foreseeable future offshore wind projects is included in Appendix A of the FEIS. Quantitative impact analysis is provided as appropriate in the specific resource sections within Chapter 3 and Appendix A.</p>
0206-010	<p>Agreement with National Wildlife Federation Does Not Protect North Atlantic Right Whales from Project’s Operational Impacts. During the Nantucket “town hall” meeting, a member of the National Wildlife Federation explained that her organization had entered into an agreement with Vineyard Wind that promised to protect and avoid take of North Atlantic Right Whales (NARWs). We have reviewed that agreement, and while it does impose important and helpful restrictions on construction-related impacts (such as those associated with pile driving and vessel speed), it does not provide sufficient measures for protecting NARWs from the Project’s operational impacts (such as noise and vibrations capable of disrupting whale behavior and the potential for the wind turbine array to disrupt whale echolocation and navigation). Given that the DEIS likewise failed to address or analyze these critical issues, it appears that BOEM and Vineyard Wind have taken the position that there is no need to study whether the Project will have operational impacts on NARWs. NEPA’s “hard look” requirement, however, cannot be satisfied by simply ignoring an impact and acting as if it doesn’t exist or won’t occur. In short, the DEIS must reexamine the project’s operational impacts and disclose their potential to adversely affect NARW behavior.</p>	<p>Section 3.4.2 of the FEIS has been revised to include a discussion of acoustic impacts on marine mammals. Further details regarding acoustic effects to these species are provided in Appendix F of the FEIS and in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/.</p> <p>Section 3.4.2 and Appendix D of the FEIS have been revised to include a discussion of monitoring and mitigation that has been proposed for the agency-preferred alternative relative to the North Atlantic right whale. Pre- and post-construction monitoring plans, if required, will be developed in coordination with the NMFS as part of the ESA Section 7 consultation.</p>
0206-011	<p>Failure to Assess the Project’s Specific Impacts on the Unique History and History- Related Tourism of Nantucket. The DEIS includes a short and weak</p>	<p>Section 3.9.1 of the FEIS discusses the characteristics of Nantucket and Martha’s Vineyard.</p>

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	analysis of the Project’s potential impacts on historical resources and tourism. No part of this analysis actually examines the unique history of Nantucket and the Project’s adverse effects on that history. Nor does the DEIS evaluate the Project’s impacts on tourism specific to Nantucket. As a result, the DEIS underreports those impacts.	
0207-001	Of critical importance is the question of how to provide safe transit corridors for the vessels and safety responders who travel around and, eventually, through the planned wind farms in order to access the fishing grounds on the other side. In hindsight, given the size and location of the leased areas, it is unfortunate that this issue was not made more of a priority prior to the initial auction (I note favorably the lease provision added prior to the most recent auction protecting and extending established corridors). At least as early as 2008, when the British Coast Guard warned mariners of the detrimental effects of WTGs on navigational radar from a distance of 1.5 miles, the relevant agencies and government authorities have known of the risks posed by traveling in the vicinity of turbines.	Thank you for your comment.
0207-002	Unfortunately, they are now at an impasse (I take issue with the characterization in the DEIS that the 2-nm-wide corridor has been “developed through discussion among fishing stakeholders and state agencies,” which may unfortunately give the impression that fishing stakeholders are largely in agreement). Vineyard Wind contends that a transit corridor south of the array with a two-nautical mile width is sufficient; fishing industry groups rightly insist on at least 4 nautical miles. Corridor width is a straightforward issue pitting safety versus profit margin. Indeed, wind energy proponents have not shied away from making this point publicly and repeatedly; comments from proponents submitted with respect to the Coast Guard’s 2016 ACPARS report, for example, sharply criticized wider corridors and their effect on developable acreage.	Thank you for your comment.
0207-003	Given the limited state of data and research, however, and without detailed project-specific findings, I see no reasonable argument against settling on the wider end of the spectrum. Four-nm-wide corridors are consistent with the ACPARS and with the UK’s findings that 3.5-nm corridors pose tolerable risk if sufficiently mitigated, especially where Vineyard Wind intends to use WTGs that are significantly larger than existed at the time these guidelines were issued (frankly, it is not clear to me why developers should not be required to establish wider corridors that fit within the UK’s “broadly acceptable” risk profile given that mitigation determinations are inherently subjective and highly fact-sensitive).	Thank you for your comment.
0207-004	Ultimately, the threat to navigational radar posed by the turbines is not in dispute. Though the DEIS acknowledges this threat with respect to vessels within the array (see 3.4.7 at 3-208), it is devoid of any analysis of the threat within the proposed corridor, which is ironic considering the corridor is listed as one of the	Section 3.11 (formerly 3.4.7) of the FEIS discusses the navigational potential effects. Furthermore, Vineyard Wind’s supplemental navigational risk assessment (COP Volume III, Appendix III-I, Epsilon 2020a), which BOEM and

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	mitigation measures benefiting ships operating within the WDA. Accordingly, absent such analysis, I believe that public safety demands that BOEM must come down strongly on the side of caution and insist on 4-nm corridors.	USCG reviewed and found adequate for the purposes of this EIS, demonstrates that it is technically possible to fish and transit through the proposed Project.
0208-001	It is clear that New England’s most valuable resource for mitigating climate change and achieving the IPCC 2030 emission reduction goals is off-shore wind power. But the process needed to get started on construction to take advantage of that resource is simply not moving fast enough to even replace retiring fossil fuel plants let alone allow for early retirement of other plants. It is essential that Vineyard Wind and the other nearby leases get to completion as quickly as possible.	Thank you for your comment.
0208-002	...the New England fishery is also a valuable resource longer term for mitigating climate change impacts. The BOEM process has managed to pit these two resources against each other (or at least the individuals and companies that wish to exploit these resources). It should not have had to be this way. But BOEM would have a natural tendency to focus on it’s “energy silo” and only address potential negative environmental impacts and none of the positive environmental impacts.	Thank you for your comment.
0208-003	In the case of the Vineyard Wind lease, it appears there was a communications failure around the number, orientation and spacing of the wind towers. It appears little was learned from European experience with off-shore wind and fisheries--though approaches in Europe seems to vary with varying success stories.	Thank you for your comment.
0208-004	The EIS process for the remaining leases should be changed in an effort to accelerate the delivery of the wind resources, by treating the entire leased area as one to appropriately address balancing wind power resources with fishery resources. A preliminary review of the number, orientation and spacing of the wind towers with the fishing interests allows the fishery interest to only have to address the issue one more time. A comprehensive approach would also reduce uncertainties in construction planning for the remaining lessees.	Thank you for your comment.
0208-005	I am hopeful that off-shore wind and fisheries will turn out to not really be competing resources but will be developed cooperatively. Ultimately, the offshore towers become a fairly large artificial reef which should ultimately support fisheries. In addition it would appear there are opportunities to co-locate offshore wind and aquaculture. Perhaps there is a model for aquaculture leasing that addresses competing fishery resources. Thanks to whomever has to read all these comments.	Thank you for your comment.
0209-001	BOEM characterizes impacts to the commercial fishing industry as “moderate”. “Moderate” impacts are defined as “Impacts on the affected [biological] resource are unavoidable” and “Impacts on the affected activity or community are unavoidable”; this includes “disruption to harvesting activities during operation	Section 3.10 of the FEIS has been updated to include details of mitigation and monitoring measures relative to commercial fisheries, including voluntary financial compensation. Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures.

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	<p>of offshore wind facility”. This is the significant, and permanent, degree of loss the Rhode Island fishing community is to expect with a proper compensation and mitigation plan that includes a full and comprehensive analysis of all negative impacts to the Rhode Island fishing industry. This is severe enough in itself. Without a proper mitigation plan, BOEM characterizes the impacts to the commercial fishing industry arising from the Vineyard Wind project as “major”, which is defined as “The affected activity or community would experience unavoidable disruptions to a degree beyond what is normally acceptable, AND The affected activity or community may retain measurable effects indefinitely, even after the impacting agent is gone and even if Vineyard Wind takes remedial action.” Therefore, it is important that BOEM ensure that Vineyard Wind adhere to appropriate mitigation and compensation at this time, because future adverse impacts to the Rhode Island commercial fishing industry would be irreparable.</p>	<p>These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.</p>
0209-002	<p>BOEM itself acknowledges that “some fisheries- like the squid trawl fishery-may not be able to safely operate and harvest the resource in the WDA”. The squid fishery is the most valuable fishery within the Vineyard Wind project area, according to the RI DEM analysis, and also the major economic driver of the Rhode Island commercial fishing industry, as the state of Rhode Island consistently lands more squid than all other East Coast states combined.</p>	<p>Section 3.10.2 of the FEIS has been updated to further assess the potential impacts related to vessel maneuverability as well as potential migration measures.</p>
0209-003	<p>BOEM needs to be informed of several problematic issues with the RI process thus far. Furthermore, we are aware of economic fisheries studies that exist that should be a part of analysis included in BOEM’s FEIS for the Vineyard Wind project.</p>	<p>Thank you for your comment.</p>
0209-004	<p>The affected commercial fishing industry, both the federal offshore squid trawl fishery and the shore side businesses including fish dealers and processors, were left off of the FAB and were not allowed to be part of the process that developed final mitigation. We have already submitted comments from the three largest dealer/processors in the state of Rhode Island to this effect.</p>	<p>Thank you for your comment.</p>
0209-005	<p>Mitigation negotiations between the FAB, CRMC and Vineyard Wind were conducted privately, and none of the reports/data or proposed agreements utilized in those negotiations have yet been made public. As this is a publicly required process, all documents used in negotiations should have been made public for the affected public to view, digest, engage, and comment on, prior to any agreement or tentative agreements being signed. However, prior to a public FAB or CRMC meeting to discuss a final fisheries mitigation proposal, CRMC signed an agreement with Vineyard Wind on Feb. 21. Although the agreement stipulates it is contingent upon the FAB and CRMC staff recommending the plan to the full CRMC, no documents should have been signed without public review and input. The final FAB meeting to take a vote on the issue is scheduled for Feb. 23; and</p>	<p>Thank you for your comment.</p>

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	the CRMC meeting scheduled to take final vote on the issue is scheduled for Feb. 26. As the BOEM DEIS public comment period ends before those dates, we do not know what the final outcome will be. However, if the tentative agreement signed on Feb. 21 is accepted, we cannot support this.	
0209-006	BOEM is under a federal duty to obtain any and all documents used in the mitigation and compensation process with regards to the Vineyard Wind project, because BOEM’s determination of impacts from the project to the commercial fishing industry are contingent upon that mitigation being comprehensive and appropriate.	Section 3.10.2 of the FEIS has been revised to include additional and updated compensation information. Section 3.10 of the FEIS has been updated to include details of mitigation and monitoring measures relative to commercial fisheries, including voluntary financial compensation. Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0209-007	The Dennis King report is an economic report of fisheries impacts prepared by Vineyard Wind for the RI fishery mitigation negotiations. The Sproul report is an economic report of fisheries impacts developed for the same purpose, but to inform the FAB and CRMC, pursuant to the Ocean SAMP, which states: “Negotiation of mitigation agreements shall be a necessary condition of any approval or permit of a project by the Council. Mitigation shall be negotiated between the Council staff, the FAB, the project developer, and approved by the Council. The reasonable costs associated with the negotiation, which may include data collection and analysis, technical and financial analysis, and legal costs, shall be borne by the applicant.”[1] We have been made aware that the data collected as part of compiling the Sproul report was used in the fisheries mitigation and negotiation discussions, and included quantified economic data on loss of life and vessels to be expected as a result of the Vineyard Wind project, and economic losses to shoreside businesses, among other economic losses. Although this data has not been submitted at this time to CRMC, it was obtained pursuant to a public regulation and is therefore public information. We would request that BOEM acquire this information and attach it as an appendix to the FEIS.	Thank you for your comment.
0210-001	We have no doubt that this project will harm commercial fishing communities and the supply of fresh, local seafood throughout New England. BOEM must compel Vineyard Wind to create a legitimate monitoring plan to determine the harm to the fisheries resources and a legitimate compensation plan to make the fishing community whole for that harm. We agree with comments submitted by the Responsible Offshore Development Alliance, that these plans must be done in a transparent, holistic, and well-structured manner that includes impact from the wide variety of fishing businesses.	Section 3.10 of the FEIS has been updated to include details of mitigation and monitoring measures relative to commercial fisheries, including voluntary financial compensation. Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0211-001	[Turbines causing echolocation problems] may even cause whales to become lost in the wind turbine array. The DEIS, however, never addresses this issue. In fact, it does not discuss echolocation at all, other than to state that whales use it. Note	Section 3.4.2 of the FEIS has been revised on the discussion of acoustic impacts on marine mammals. Further details regarding acoustic effects to these species are provided in Appendix F of the FEIS and in the Biological Assessment

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	that NARWs are protected under the federal Endangered Species Act and the Massachusetts Endangered Species Act. The project’s impacts on these listed species are, by definition, significant and require mitigation; yet the DEIS describes the impacts as “minor” without any substantiation to back up that unfounded assessment. The DEIS should offer mitigation and / or alternatives capable of avoiding or reducing the negative effects. The DEIS ought to be revised and recirculated for review and analysis prior to it taking final form.	submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ . Section 3.4.2 and Appendix D of the FEIS have been revised on the discussion of monitoring and mitigation that has been proposed for the agency-preferred alternative relative to the North Atlantic right whale. Pre- and post-construction monitoring plans, if required, will be developed in coordination with the NMFS as part of the ESA Section 7 consultation.
0211-002	Vineyard Wind is the first phase of 5 projects, likely totaling approx. 500 to 1350 such turbines. The footprint of the Vineyard Wind project only displays the proposed location of the first 100 turbines. However, the area of proposed construction encompasses only approximately one-third of the Vineyard Wind leased area. Will there be future phases of additional construction and additional turbines / support platforms constructed in the remainder of the leased area and when? If so, the current DEIS is incomplete as it does not address the entire scope of the construction proposed for the leased area. The DEIS ought to be revised and recirculated to address this issue prior to it taking final form. This is especially of concern because, according to C.1 Past, Present and Future Reasonably Foreseeable Activities and Projects the cumulative impacts analysis does not take into consideration the likely cumulative impacts related to all other offshore wind leases.	BOEM has revised the list of reasonably foreseeable future offshore wind projects based on project progress since publication of the DEIS, and this information was included in the SEIS and carried forward to the FEIS. The list of reasonably foreseeable future offshore wind projects is included in Appendix A of the FEIS. Quantitative impact analysis is provided as appropriate in the specific resource sections within Chapter 3 and Appendix A of the FEIS.
0211-003	The footprint of the project is inside of the Right Whale Dynamic Management Area (DMA) often used to protect Right Whales from dangers of injury due to human interaction such as fast-moving vessels (such as will be used during construction and maintenance activities).	Section 3.4.2 and Appendix D of the FEIS have been revised on the discussion of monitoring and mitigation that has been proposed for the agency-preferred alternative. Pre- and post-construction monitoring plans, if required, will be developed in coordination with the NMFS as part of the ESA Section 7 consultation.
0211-004	It is now clear that Vineyard wind does not intend to utilize a soft start as previously claimed because as we have learned from https://www.rechargenews.com/wind/1708013/vineyard-eyes-faster-timeline-for-largest-us-offshore-wind-farm This news, provided by off-shore publication Recharge Wind, states, “Vineyard eyes faster timeline for largest US offshore wind farm. Avangrid-backed developer has chosen preferred offshore substation supplier for 800MW Massachusetts project. Developer Vineyard Wind is considering pulling forward the timeline for its 800MW Massachusetts offshore wind farm, potentially completing the full project in 2021, as major equipment orders fall.” This would be an aggressive schedule not allowing for any type of “soft start.” If this report is factual, something that ought to be determined vis the DEIS process, then the DEIS ought to be revised and recirculated for review and analysis prior to it taking final form.	Please note that “soft start” refers to impact hammering, not scheduling. The proposed Project schedule A detailed Project schedule is included in COP Chapter 4, Figure 4.1-1 (Volume I; Epsilon 2020b).

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0211-005	<p>The DEIS shows 89 turbine locations within the proposed project area for Alternatives D1 and D2 (assuming 100 turbines as originally proposed). See BOEM DEIS Figure 2.1-5 at 2-13. Since Vineyard Wind now needs only 84 turbines the wind development area extension shown in Figure 2.1-5 is unnecessary to accommodate the large (9.5MW) turbines Vineyard Wind has committed to using for this project. BOEM acknowledges that VW “could” use a larger turbine and thus Alternative E (84 turbines) would reduce area of WDA. See: 2.1.5, p. 2-14. Nevertheless, since Vineyard Wind has committed to using the larger 9.5MW turbine model, then there will be no expansion necessary of the proposed project area (WDA) under either Alternative D1 or D2. Importantly, given Vineyard Wind’s commitment to using the larger 9.5MW turbine model, the DEIS should be revised to include an analysis of all the Alternatives within the DEIS using only the 84 large turbines required to meet the purpose and need of the project (i.e. to generate 800MW).</p>	<p>An alternative that contemplates the use of 84 9.5-MW WTGs, spaced 1.5 nautical miles between them, when compared to other alternatives being analyzed in detail (i.e., Alternatives A, B, C, and E), will substantially increase the footprint of the project and its environmental impacts—particularly due to increased seabed disturbance for inter-array cables and increased duration of vessel trips during construction and operations. While increased spacing between WTGs would allow for better maneuverability of fishing vessels that are actively fishing within the Project area, the substantial increase in project footprint would also increase the OCS areas that are subject to navigational impacts resulting from the project by introducing WTGs in OCS areas not reached by other alternatives (i.e., Alternatives A B, C and E). Therefore, this alternative was not analyzed in detail because BOEM expects it to result in more impacts than those expected from other alternatives being fully analyzed (e.g., Alternatives A B, C, and E).</p> <p>The development of the EIS has been based on Vineyard Wind’s utilization of the PDE, which included a range of 8-10 MW WTGs as assessed in the DEIS and was updated to allow for up to 14 MW WTGs. The FEIS assesses the impacts of the reasonable range of Project designs that are described in the Vineyard Wind COP and presented in Appendix G by using the “maximum-case scenario” process. Therefore, utilization of the 9.5 MW machine falls within the PDE and impacts have been accounted for.</p>
0211-006	<p>If every Wind Turbine Generator installed within all the lease blocks now and in the coming years is just 8MW in capacity (a small assumption based on the Vineyard Wind’s recently stated objective of installing 9.5MW generators), then there is the potential for 1375 turbines to be installed within the current BOEM lease blocks in southern New England waters.</p>	<p>Thank you for your comment.</p>
0211-007	<p>The DEIS impacts analysis overlooks the potential impacts on the commercial fishing industry that will result from the installation and operation of as many as 1375 turbines in southern New England waters upon build out of the BOEM leases. Fishing vessel displacement will occur as a result of the Vineyard Wind and other planned and future offshore wind energy projects and must be accounted for in BOEM’s analysis.</p>	<p>BOEM prepared a SEIS that included an expanded planned action analysis, which described the methodology in Chapter 1 and the list of projects considered in Appendix A of the SEIS. Potential impacts are considered as described in Appendix A and in individual resource sections. BOEM has revised the list of reasonably foreseeable future offshore wind projects based on project progress since publication of the DEIS. Potential impacts are considered as described in Appendix A and in Section 3.10 of the FEIS.</p>
0211-008	<p>The DEIS indicates some limitations in addressing future project impacts, but it also assumes that generalized impacts would likely be similar in nature to those presented within the DEIS. (See at C-10). The DEIS ought to be revised to include a more thorough cumulative analysis of all the Alternatives to improve the overall understanding of project impacts.</p>	<p>BOEM prepared a SEIS that included an expanded planned action analysis, which described the methodology in Chapter 1 and the list of projects considered in Appendix A of the SEIS. Potential impacts are considered as described in Appendix A and in individual resource sections. BOEM has revised the list of reasonably foreseeable future offshore wind projects based on project progress since publication of the DEIS. As was done in the DEIS, impacts of alternatives</p>

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		are addressed in individual resource-specific sections within Chapter 3 and Appendix A.
0211-009	The DEIS states in Table 6-1: Irreversible and Irrecoverable Commitment of Resources by Resource Area. “Based on the anticipated duration of construction and operations, BOEM does not anticipate impacts on commercial fisheries to result in irreversible impacts. Irrecoverable impacts could occur due to loss of use of fishing areas at an individual permit level.” Hence, the DEIS implies that commercial fishermen may not be able to fish within Vineyard Wind’s WDA for the life of the project (30 years), they will be able to fish within the larger WDA after the project. But that fails to consider the entire scope of all the leased hold development areas. This assumption is not supported by any documentation. Fishery resources impacts from construction phases of the project are largely unknown. As such, the DEIS ought to be revised and recirculated for review and analysis prior to it taking final form.	Section 3.10.2 of the FEIS has been revised to discuss that Vineyard Wind could alter habitat during construction and operations, or limit access to fishing areas, however the decommissioning of the project will reverse those impacts. Irrecoverable impacts could occur due to loss of use of fishing areas at an individual permit level. Vineyard Wind’s supplemental navigational risk assessment (COP Volume III, Appendix III-I, Epsilon 2020a), which BOEM and USCG reviewed and found adequate for the purposes of this EIS, demonstrates that it is technically possible to fish and transit through the proposed project.
0211-010	There are hundreds of gallons of oils, and other hydrocarbon fluids in each wind turbine generator and the several support platforms. The DEIS makes no analysis of the potential hazards associated with spills or leaks. There are no containment vessels to be included in any of the wind turbine generators, although I discussed with representatives of Vineyard Wind. They acknowledged that containment vessels could be installed, but likely would not be installed. All the oil and other hazardous contaminant hydrocarbon fluids must be transported to and stored within the wind turbine generators and on the support platforms. The DEIS does not analyze the potential spill hazards associated with moving and storing these contaminants.	Section 2.3 of the FEIS discusses the potential for release of oil from WTGs and ESPs. Section A.8.2.2 in Appendix A of the FEIS has been updated to include additional information on the probability of a spill and the spill reaching the shoreline.
0211-011	The whale species affected by the project’s noise impacts are federally-listed as endangered. Thus, the impacts are, by definition, significant and require mitigation. The DEIS, however, does not characterize any of the discussed impacts as significant nor does it offer mitigation or alternatives to avoid or reduce the impact. The DEIS ought to be revised and recirculated to address this issue prior to it taking final form.	Section 3.4.2 of the FEIS has been revised for a discussion of acoustic impacts on marine mammals. Further details regarding acoustic effects to these species are provided in Appendix F of the FEIS and in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ . Section 3.4.2 and Appendix D of the FEIS have been revised for a discussion of monitoring and mitigation that has been proposed for the agency-preferred alternative relative to the North Atlantic right whale. Pre- and post-construction monitoring plans, if required, will be developed in coordination with the NMFS as part of the ESA Section 7 consultation.
0211-012	Vineyard Wind supposedly will initiate certain mitigation steps to try protecting marine mammals. In reviewing Appendix D, it would be prudent for BOEM to require the implementation of other mitigation measures than those few described in Appendix D of the DEIS, including long-term passive acoustic monitoring,	Section 3.4.2 and Appendix D of the FEIS have been revised for a discussion of monitoring and mitigation that has been proposed for the agency-preferred alternative relative to the North Atlantic right whale. Pre- and post-construction

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	daily pre-construction passive acoustic monitoring and visual surveys, and the prohibition of pile driving from sunset to sunrise during construction. Vineyard Wind has recently signed an agreement with certain agencies to attempt to implement mitigation measures, but these measures are yet unproven.	monitoring plans, if required, will be developed in coordination with the NMFS as part of the ESA Section 7 consultation.
0211-013	There is inadequate assessment of project’s noise impacts on whale behavior. The DEIS evaluates the project’s construction-related noise impacts (mostly from pile driving and transport vessels) on whales, but this analysis ignores operational phases of the project and focuses on noise levels capable of causing physical injury or death to whales. The DEIS does not address sub-lethal or sub-injurious noise levels and how they will affect whale behavior. Since the sound pressure required to injure or kill a whale is substantially higher than the sound pressure needed to disrupt whale communication or navigation the DEIS analysis is skewed to the higher end of the noise scale. The DEIS determines that the project’s noise impacts are unlikely to injure or kill whales without addressing the issue of whether the noise from constructing and operating the wind turbines has the potential to interfere with key aspects of whale behavior. Will whales try to avoid this area of the ocean – an area which has historically supported whale birthing and rearing? This potential impact is not addressed. The DEIS does not characterize the impact of noise on whales’ behavior as significant. It does not offer mitigation or alternatives to avoid or reduce the impact. The DEIS ought to be revised and recirculated to address this issue prior to it taking final form.	Section 3.4.2 of the FEIS has been revised for a discussion of acoustic impacts on marine mammals. Further details regarding acoustic effects to these species are provided in Appendix F of the FEIS and in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ .
0211-014	There is inadequate assessment of Project’s potential to cause vessel collisions with whales. During the years-long construction phase of the project, vessels of various size will be traveling to and from the wind turbine array zone. We know from recent studies and actual events that in the coastal waters off Massachusetts, vessel collisions with whales are increasingly common. The DEIS claims that vessels associated with construction of the project will be slow-moving and thus unlikely to collide with whales. The evidence, however, is to the contrary. It appears that most of the vessels to be used in the construction of the Vineyard Wind project will travel anywhere between 10 and 20 knots per hour – more than fast enough to cause whale strikes. (See p. 3-99.) The whale species affected by the project’s potential for vessel-to-sea mammal collisions are federally-listed as endangered. Thus, these impacts are, by definition, significant and require mitigation. The DEIS, however, does not characterize the impacts as significant and fails to offer mitigation or alternatives to avoid or reduce the impacts.	Sections 3.4.2, 3.4.3, and 3.4.4 of the FEIS have revised the discussion of the potential for vessel strikes for each alternative. Further discussion of vessel strike potential is provided in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ . Section 3.4.2 and Appendix D of the FEIS have been revised for a discussion of monitoring and mitigation that has been proposed for the agency-preferred alternative. Pre- and post-construction monitoring plans, if required, will be developed in coordination with the NMFS as part of the ESA Section 7 consultation.
0211-015	On page 3-90, the DEIS describes the current status of the North Atlantic Right Whale (NARW) – a federally-listed endangered species. NARW mortality spiked since 2017. Despite recent sighting of five calves, the “reproductive output for the species has declined by 40 percent since 2010 (Kraus et al. 2016a).” (p. 3-90.) In addition, from 1989 when aerial surveys began until just recently, we know that	Section 3.4.2 of the FEIS has been revised for a discussion of acoustic impacts on marine mammals. Further details regarding acoustic effects to these species are provided in Appendix F of the FEIS and in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ .

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	<p>no new NARW calves were documented in their calving grounds until recently when thankfully five calves have finally been spotted. (Id.) The DEIS acknowledges, “[t]his combination of factors threatens the very survival of this species (Pettis et al. 2017).” (Id.) Despite these findings, and despite the clear evidence that the proposed Project – during construction and operation – will adversely affect NARWs, the DEIS concludes that the Project’s impacts on the species will be “minor” with Vineyard Wind’s “self-imposed” measures. (p. 3-102.) These measures, however, are not well-described and are not linked to each of the identified impacts on the species. Thus, there is no way to ascertain whether they will or will not reduce impacts on NARW to such a degree as to render the impacts less than significant (or minor). Simply put, the conclusion drawn on page 3-102 regarding impacts to NARW cannot be squared with the available data. There are no supporting references or documentation regarding the DEIS “Minor” impact determination regarding North Atlantic Right Whales.</p>	<p>Section 3.4.2 and Appendix D of the FEIS have been revised for a discussion of monitoring and mitigation that has been proposed for the agency-preferred alternative relative to the North Atlantic right whale. Pre- and post-construction monitoring plans, if required, will be developed in coordination with the NMFS as part of the ESA Section 7 consultation.</p>
0211-016	<p>The DEIS includes two tables that are meant to show how much noise certain whales and other marine mammals can withstand before suffering injury or altering their behavior. See Table 3.3.7-4 (PTS Onset Acoustic Threshold Levels) and Table 3.3.7-5 (Behavioral Exposure Criteria). I doubt that anyone in the general public, except perhaps experienced acoustical engineer would understand unless it was sufficient and simply explained. The DEIS does not explain the tables nor does it explain what they mean. For example, the first table is supposed to show the amount of noise associated with a “permanent threshold shift” (PTS), but the DEIS does not define that term. The tables showing noise impacts on marine mammals are indecipherable and ought to be revised.</p>	<p>Section 3.4 of the FEIS has been revised to explain the expected impacts on marine mammals, while quantitative information on marine mammal occurrence has been moved to Appendix E and quantitative information on sound exposure has been moved to Appendix F.</p>
0211-017	<p>The DEIS does not discuss Scenario 1 or any other scenario mentioned in the discussion section showing Table 3.3.7-6 and Table 3.3.7-7, those Tables show that the Project’s construction noise under Scenario 2 would injure a certain number of NARWs and other federally-listed whales (Fin Whale and Sei Whale) during each day of pile installation. According to the DEIS, the Project will require 102 pile installation days, which means that over the course of Project construction, large numbers of NARWs, Fin Whales and Sei Whales will be injured or otherwise adversely affected by pile-installation noise. This is a significant (major) impact and the DEIS should describe it as such. Instead, however, the DEIS states that “Vineyard Wind’s self-imposed measures of utilizing soft start, Protected Species Observers, and passive acoustic monitoring would reduce the potential impacts to marine mammals” to a minor or moderate risk. Yet, the DEIS does not demonstrate how these three measures will actually prevent or reduce the identified noise impacts on whales, especially the NARW, which, as explained above, is suffering sharp and significant declines in population and reproductive resilience.</p>	<p>Section 3.4 of the FEIS has been revised to explain the expected impacts on marine mammals, while quantitative information on marine mammal occurrence has been moved to Appendix E and quantitative information on sound exposure has been moved to Appendix F. The numbers of whales that could be affected by the proposed Project are specifically determined by NOAA under an Incidental Harassment Authorization. This IHA could be suspended or revoked if the permitted numbers are exceeded.</p>

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0211-018	AThe DEIS ought to be revised to address this discrepancy between a “soft start” and a more aggressive construction schedule. The DEIS downgrades noise impacts on North Atlantic Right Whales and other Federally listed whale species without any documentation to support these assessments. This ought to be explained and justified since there is no documentation to support such assessments	Please note that “soft start” is related to pile driving impact energy, not the construction schedule. The proposed Project schedule A detailed Project schedule is included in COP Chapter 4, Figure 4.1-1 (Volume I; Epsilon 2020b). Section 3.4 of the FEIS has been revised to explain the expected impacts on marine mammals, while quantitative information on marine mammal occurrence has been moved to Appendix E and quantitative information on sound exposure has been moved to Appendix F. The numbers of whales that could be affected by the proposed Project are specifically determined by NOAA under an Incidental Harassment Authorization. This IHA could be suspended or revoked if the permitted numbers are exceeded.
0211-019	This conclusion by the DEIS are at odds with the results of a 2013 study conducted by Scottish scientists, titled “Modelling of Noise Effects of Operational Offshore Wind Turbines including noise transmission through various foundation types” (Marmo, B., Roberts, I., Buckingham, M.P. King, S., Booth, C. (2013).) That study determined that the operational noise levels of the wind turbines would be audible to marine mammals, especially when the turbines are producing maximum power. In addition, the study concluded that “species with hearing specialized to low frequency may be able to detect the wind farm from at least 18 km away” (Marmo, et al., pp. 57-58.) The DEIS ought to address the implications of the Marmo, et al. study and determine if its results alter the conclusions drawn in the DEIS relative to the project’s operational noise impacts on NARW and other marine mammals. There is inadequate assessment of the project’s operational noise on whales and other marine mammals.	Section 3.4.2 of the FEIS has been revised for a discussion of acoustic impacts on marine mammals. The conclusions of the FEIS are based on measurements recorded in the water around operating wind facilities. Marmo et al. (2013) was based on predictive modeling and did not consider actual in-water measurements, the surrounding ambient noise, or new quieter wind turbine generators in use today. Measurements taken at the Block Island Wind Farm show that noise is expected to be heard at the distances predicted by Marmo et al. Note that the Marmo et al. study predicted that marine mammals would be able to hear noise at much lower intensities that those predicted to cause a behavioral or physiological change. Further details regarding acoustic effects to these species are provided in Appendix F of the FEIS and in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ .
0211-020	The DEIS does not address certain operational procedures, such as deicer spraying of blades to remove layers of buildup ice on blades and other components.	Deicing sprays have been applied to the surface of onshore turbines to minimize icing and maximize heat absorption (Froese, 2017). However, a spray may not prove to be the most efficient approach offshore because re-application would be necessary over time or after a serious icing event. Even for onshore wind facilities where reapplication is much less difficult, developers are opting for heated “turbine blades that use thermal devices, such as built-in electric foils” instead of deicing sprays. Although Vineyard wind is not planning to use thermal devices to heat their turbine blades, the use of deicing spray is not anticipated due to the infrequency of icing events offshore and the difficulty in reapplication in the offshore environment. No change was made to the EIS regarding this comment. As stated in the Navigation Risk Assessment, ice accumulation is most likely to occur when air temperature is less than 0°C [32°F], when relative humidity (RH) is greater than 95 percent (i.e., high fog or cloud conditions), and during relatively low wind speeds (Hudecz et al., 2014). Historical data from NOAA meteorological station 44008 located 54 nautical miles southeast of Nantucket Shoals does not have

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		record of an observed air temperature less than 0°C [32°F], RH greater than 95 percent, and wind speed less than 5 m/s simultaneously.
0211-021	...the DEIS describes the impacts [to turtles] as “minor” without presenting supporting documentation or references. Nor does the DEIS does not offer mitigation measures nor an alternative capable of avoiding or reducing those impacts. The proliferation of EMFs from hundreds of miles of undersea cables from almost 1,365 wind turbine generators planned for the leasehold developments will confuse and negate the sea turtles’ navigation system. The sea turtles lose their way due to the effects of EMFs, and then they become stranded and die. Recent monitoring studies show that sea turtles in New England are now become stranded in greater numbers and with greater frequency than any time in history. According to some scientists, the sharp rise in sea turtle strandings are likely due to EMF interference from man-made objects, especially those that create their own EMFs, such as undersea cables. Off-shore wind turbine generator projects connect each wind turbine to service platforms and to an on-shore relay station platform. Those transmission cables are jet plowed into the sea floor, buried just a few feet under the seabed and emit electromagnetic signals, which will disrupt sea turtle navigation. The DEIS does not disclose or analyze this impact. There is inadequate assessment of the project’s impacts on sea turtles.	To minimize EMF generated by cables, all cabling would be contained in grounded metallic shielding to prevent detectable direct electric fields. Vineyard Wind would also bury cables to a target burial depth of approximately 6.6 feet (2 meters) below the surface. Section 3.5.2 of the FEIS has been updated to include additional information on EMF-related impacts on sea turtles. Further discussion of EMF-related impacts on these species is also provided in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ .
0211-022	Wind turbines must be anchored into the bottom of the ocean, which means the foundation of each wind turbine generator must be secured into the seafloor. The installation of these foundations requires removal of the soft seabed, which, in turn, will be replaced by the hardened structure of the platform. The DEIS contends without any documentation that this is somehow a biological benefit, in that the foundations and supporting tubular framework function as a kind of artificial reef that will attract fish. This, however, is not the issue. The DEIS is supposed to analyze what will be lost by damaging and covering up the soft seabed habitat and the benthic organisms that live there. These are the naturally occurring flora and fauna on which the entire ecosystem in Muskeget Channel is based. Yet, the EIS dismisses this impact entirely. There is inadequate assessment of the loss of soft seabed habitat. Hence, the DEIS ought to be redrafted to address these soft seabed habitat issues.	Section 3.3.5 of the DEIS described the impact of permanent habitat conversion as moderate [negative] impact. The creation of new hard-bottom habitat is a beneficial result, but does not reduce the level of impact on soft-bottom communities. Section 3.2 of the FEIS has been revised to state that loss of soft-bottom habitat may be adverse. Chapter 2 of the DEIS, as well as the FEIS, explained that the installation of the foundations would be through pile driving and scour protection added around each foundation.
0211-023	On page 3-32, the DEIS provides a bullet-point list of six project-related impacts on birds and then claims that “Section 3.3.2.2 includes a detailed discussion of these impacts.” There is no such detailed discussion. For example, the second bullet point relates to permanent loss of bird habitat, but all that Section 3.3.2.2 provides is that it says is that “[s]ome birds might avoid the WDA during its operation, leading to an effective loss of habitat,” and that “[l]oons, grebes, seabirds, and northern gannets typically avoid offshore wind developments,	Section A.8.3.2 in Appendix A of the FEIS includes an updated discussion on foraging and potential for loss of bird habitat.

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	resulting in loss of habitat and reduced risk of collision.” (p.3-36). These statements provide almost no useful information or meaningful analysis regarding this impact. The DEIS ought to respond to issues such as what other bird species will attempt to avoid the wind turbine array and thereby lose important forage habitat.	
0211-024	Among the birds that will not avoid the wind turbine array, how many – and of which species – will potentially collide with the blades of the wind turbines?	Section A.8.3.2 in Appendix A of the FEIS includes an updated discussion on potential for collision. In addition, Figure A.8.3-3 of the FEIS depicts modeled use of the offshore portion of the proposed Project area by bird species with high displacement sensitivity.
0211-025	[The DEIS] does not attempt to quantify how much habitat will be lost to those birds that do avoid the project area. There is no support for the conclusion that the Project’s impacts on bird habitat will be “negligible.” There is inadequate analysis of the project’s operational effects on birds. The DEIS ought to be revised and represented to address such avian hazard issues.	Section A.8.3.2 in Appendix A of the FEIS includes an updated discussion on foraging and potential for loss of bird habitat.
0211-026	The DEIS acknowledges that the Wind Turbine Generators will injure or kill birds that pass too near.” (p. 3-36.) However, the DEIS then goes on to state that the “magnitude of this impact is difficult to estimate, and it differs across species.” (Id.) This is not a NEPA required analysis. The NEPA law requires that the DEIS (i) identify the bird species that could injured or killed by the rotating blades of the Wind Turbine Generators, and (ii) determine through scientific analysis how many are likely to be harmed in this particular case – both on a project-specific and cumulative basis. The DEIS is supposed to assess whether the project has the potential to affect any listed bird species, no matter whether the number of affected listed birds is small when compared to more common bird species. There is no support for the DEIS’s conclusion that the Project’s bird collision impacts would be “minor.” The DEIS fails to properly address the scope of bird collision impacts. The DEIS ought to be revised and represented to address such bird kill issues.	Section A.8.3.2 in Appendix A of the FEIS has been updated for a discussion of the species most susceptible collision with operating WTGs. A complete list of species highly susceptible to collisions is provided in Robinson Willmott et al (2013), which is incorporated by reference into the FEIS. It is impossible to quantify the number of birds, if any, that will have fatal interactions with operating WTGs. The Biological Assessment submitted to USFWS (located at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/) addressed impact on federally listed species and included modeling of the estimated number of individuals that may be killed by operating WTGs
0211-027	In the DEIS, there is a Figure 3.3.2-1, titled “Total Avian Relative Abundance Distribution Map for the Higher Collision Sensitivity Species Group,” This Figure 3.3.2-1 is misleading and it seems to lack important information. The Table does not identify which birds fall within the “higher collision sensitivity species group”. It does not even provide the basis it used to define these birds as “higher collision sensitive”. The Table fails to explain the differences between “high” collision sensitivity from “low” collision sensitivity. The Table itself has no supporting information for its suggestion that no birds at all fly over or near the proposed Project. The figure makes the unbelievable assertion that no birds are currently using the project area and thus no birds are likely to be affected by the project, despite know migration and fly-ways that cross the entire leasehold	Section A.8.3.2 (formerly 3.3.2.3) in Appendix A of the FEIS has been updated for a discussion on potential for collision and displacement. Also, Figure A.8.3-2 and Figure A.8.3-3 in Appendix A of the FEIS depict modeled use of the offshore portion of the proposed Project area by bird species with high collision sensitivity and high displacement sensitivity, respectively, which depict the expected distribution of birds in these groups relative to the proposed Project area. Complete lists of species highly susceptible to collision and displacement, as well as definitions of high, medium, and low risk for these effects are provided in Robinson Willmott et al (2013), which is incorporated by reference into the FEIS.

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	area. Figure 3.3.2-2, titled “Total Avian Relative Abundance Distribution Map for the Higher Displacement Sensitivity Species Group,” is just as misleading. These Avian Abundance Maps lack key information and are misleading. They ought to be corrected and represented.	
0211-028	The DEIS refers that three federally listed bird species – the Roseate Tern, the Piping Plover, and the Rufa subspecies of the Red Knot – may occur within the Project area and thus be subject to project-related impacts. (p. 3- 32.) These species are protected by federal law and may not be taken, even incidentally, without authorization under the Endangered Species Act. The DEIS does not analyze the project’s operational or cumulative effects on any of these three species. The DEIS does not discuss whether and to what extent the project intrudes upon or would affect designated critical habitat for these listed bird species. The DEIS provides an inadequate analysis of the project’s operational impacts on the listed species. The DEIS ought to be revised and represented to address such issues.	Section A.8.3.1 in Appendix A of the FEIS includes an updated discussion on listed species status and expected effect determination relative to these species. A detailed discussion of federally listed species and designated Critical Habitat is provided in the Biological Assessment submitted to USFWS (located at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/). The Biological Assessment includes an analysis of potential effects for each of these species as well as modeling of the potential for fatal interactions with operating WTGs.
0211-029	Page 3-43 of the DEIS indicates that the federally-listed northern long-eared bat and three state-listed bats – the eastern small-footed bat, the little brown bat, and the tri-colored bat – are known to occur in the project area and thus could be affected by the Project. The DEIS makes no attempt to analyze the Project’s operational or cumulative impacts on any of these particular species. To the extent such species might be affected, the impact would not be “negligible” as indicated in the DEIS (p.3-45) but significant. This is an inadequate analysis. The DEIS ought to be revised and represented to address such issues.	Section A.8.3.1 in Appendix A of the FEIS includes an updated discussion on listed species status and expected effect determination relative to these species. A detailed discussion of federally listed species is provided in the Biological Assessment submitted to USFWS (located at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/). The Biological Assessment includes an analysis of potential effects for each of these species as well as modeling of the potential for fatal interactions with operating WTGs. The Biological Assessment concludes that take of these species is not expected to occur and as such, the project is not expected to result in impacts.
0211-030	Page 3- 12 of the DEIS describes the water circulation process/system in and near the project area by stating: “Large-scale regional water circulation is strongest in late spring and summer. The clockwise movement around Georges Bank and flow towards the equator dominates the regional water circulation (Gulf of Maine Census 2018). The edge of the continental shelf creates a shelf-break front that encourages upwelling. Weather-driven surface currents, tidal mixing, and estuarine outflow all contribute to driving water movement through the area (Kaplan 2011).” But the DEIS then does not analyze the Project’s individual and cumulative impacts on local and regional water movement. Given that there could be as many as 1,365 Wind Turbine Generators in the Area of Potential Effect (APE), each with its own hardscaped underwater foundation and superstructure, it is likely that water currents, flow rates, tidal mixing, circulation, estuarine flow, and seabed/benthic morphology will be affected by so many large structures being placed within the channel. The DEIS should have assessed this potential impact as well as the impacts in terms of their secondary effects on biological resources and processes. This omission ought to be corrected.	Appendix E of the FEIS has been updated to include additional information related to atmospheric and oceanographic effects of offshore wind facilities. The potential effects of such changes are assessed in the revised Sections 3.2.2 and 3.3.2 of the FEIS. The geographic analysis areas for each resource are depicted in Appendix A of the FEIS.

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0211-031	<p>On page 2-62, the DEIS acknowledges that Project construction will have “moderate” impacts on benthic organisms, including mortality, damage, and displacement of invertebrate organisms, which are the trophic base for the marine ecosystem. While making this acknowledgement, the DEIS does not to propose any mitigation for this impact. Without any investigation or supporting documentation to address how such impacts might be mitigated, it just states that the impact is “unavoidable”. NEPA requires more than such a declaration. Hence, it seems that the DEIS is flawed in this regard as a matter of law. While the DEIS mentions that Vineyard Wind may “monitor” benthic conditions during and after construction, monitoring alone – i.e., without corrective action – it is not clear whether “may” means they “will”, and it is certainly is not mitigation.</p>	<p>The FEIS Section 3.2 has been updated to include monitoring initiatives to ensure documentation of potential effects on benthic resources. Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. Additional mitigation and monitoring measures may arise from consultations and coordination with Federal and State resource agencies. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.</p>
0211-032	<p>In its discussion of the Project’s construction impacts on fish habitat, the DEIS states: “Because the long-term habitat alteration would be temporary and would encompass a proportionally small area, these impacts are unlikely to have major impacts on populations in the WDA footprint and displaced species would have large areas of preferred habitat available nearby.” This sentence is inconsistent and confusing. How can the impact of habitat alteration be both “long-term” and “temporary”? NEPA context is violated by this diametrically opposed comparison. Does the DEIS mean to say that adverse impacts lasting the 30-year life of the Project are “temporary”? That’s not how most NEPA documents define temporary impacts. The meaningless reference in the DEIS to “proportionally small area” is vague. What is the DEIS comparing the “small area” to? Under what basis or documentation does the DEIS imply that the affected invertebrates and fish will move to another “preferred habitat nearby.” What does “nearby” mean? It seems that the species in question do not have means to search out and locate such habitat. The vast size of the APE belies the term “nearby”. Many invertebrates and smaller fish do not migrate or move far from their resident areas. Even a relocation of as little as a few miles is beyond their capability. None of these issues are discussed or analyzed in the DEIS. The document is defective in this regard. This ought to be corrected.</p>	<p>Section 3.3.2 of the FEIS has been revised to address inconsistency.</p>
0211-033	<p>The DEIS admits that project construction will affect benthic fish such as winter flounder, American lobster, and monkfish, and may result in egg loss and reduced fish recruitment. On Nantucket, the reconstruction of a Town dock has been constrained to a short and specific construction period by Federal requirements associated with winter flounder breeding. The DEIS however, concludes that adverse impact to flounder breeding “would be limited and BOEM does not anticipate impacts on the flounder stock.” The DEIS provides no clear evidence to support this seemingly unsupportable conclusion. The only reference is to the EIS for the failed Cape Wind project estimated that seabed scars from jet plow cable installation would recover in 1 to 38 days. (p. 3-76.).</p>	<p>The FEIS has been revised and now does not include predictions about any individual population or stock. Section 3.3.2 explains why the loss of some eggs or larvae would have little effect on populations of broadcast-spawning organisms. Section 2.2.1, Section 3.3.6.3, and Appendix D of the DEIS included a discussion of monitoring and mitigation proposed for the Project. Section 3.3.2 of the FEIS has provided additional language for monitoring. Additional monitoring requirements and mitigation measures (e.g., to protect flounder), if any, will be developed in coordination with the NMFS and included in the Record of Decision.</p>

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	This reference, which is an unsupported estimate having no substantiated field research or monitoring, bears no relationship to impacts on flounder.	
0211-034	The DEIS also refers to an EFH (Essential Fish Habitat) Assessment that was prepared for this Project, but the DEIS does not provide the results of the EFH Assessment. Instead we must try to make our own assessment of the significance of the Project’s impacts on EFH. Without any context or explanation, the DEIS describes the impacts on EFH as “moderate”. The DEIS provides no mitigation to avoid or reduce those impacts. This ought to be corrected in the next version of the DEIS before it is made final.	Section 3.3 of the FEIS incorporates the EFH Assessment by reference. Sections C.1.2.2.1, C.1.2.5, and C.1.2.6 in Appendix C of the FEIS have updated the discussion on NMFS coordination and consultation as part of the EIS. The EFH Assessment can be found on at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ .
0211-035	The DEIS makes it clear that the construction will result in 100% mortality of flounder eggs. The DEIS then makes the following two contradictory statements: A. “BOEM does not anticipate impacts on flounder stock.” (pp. 3-75—3-76.) and B. Under the subheading “Water Withdrawal,” the DEIS includes the following statement which suggests a very different conclusion: “Due to the surface-oriented intake for the jet plow, water withdrawal could entrain eggs and larvae of pelagic finfish and invertebrates, resulting in 100 percent mortality (MMS 2009). Jet plowing would impact species with pelagic eggs or larvae, including numerous flatfish species (e.g., windowpane flounder, winter flounder, witch flounder, [Glyptocephalus cynoglossus], yellowtail flounder and summer flounder), important commercial groundfish species (e.g., Atlantic cod, haddock, Pollock), and other recreationally and commercially important species (e.g., monkfish, Atlantic herring, Atlantic mackerel, silver hake, butterfish).” (pp. 3-76—3-77.) The DEIS does not reconcile these two contradictory statements. How can the project cause 100 percent mortality of flounder eggs and not impact the fish species. The DEIS then clouds its conclusions about the Project’s overall construction impacts on these fish even further by breaking the subject into several subcategories (e.g., impacts from habitat alteration, impacts from sedimentation, impacts from turbidity, impacts from water withdrawal, impacts from pile driving) without ever combining them. By doing this the DEIS underreports the true construction-related impacts on these fish and mischaracterize them as minor or moderate, when in fact they are significant and require mitigation. This ought to be corrected in the next version of the DEIS before it is made final.	Section 3.3 of the FEIS has been clarified for a discussion of entrainment of eggs and larvae of pelagic fish and invertebrates and the biological significance of this mortality.
0211-036	The DEIS includes a table, titled “Radial Distance (meters) to Thresholds for Fish from Impact Hammering” (Table 3.3.6-1), which attempts unsuccessfully to “present the radial distance for injury for [sic] fish hearing categories at 6 decibels (dB) attenuation.” The table as presented is unreadable. If we could figure out from the Table just the distances at which certain fish would be affected by the Project’s pile driving noise, which we can’t, the table and the DEIS don’t explain as it might relate to impact significance. As a result, too many pieces of the	Section 3.3.2 of the FEIS discusses impacts of pile-driving noise, and Table 3.3-2 has been updated to include the distance (meters) to thresholds in each simulation. The table has been renumbered and the title updated to “Radial Distance (meters) of Impact Hammering Sound Exceeding Thresholds for Fish.” The text has also been updated in the FEIS to explain the impacts expected from the predicted noise of the Project.

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	analysis are not presented. This ought to be corrected in the next version of the DEIS before it is made final.	
0211-037	Page 3-78 of the DEIS states that the “BOEM expects “minor” impacts from pile driving, because it would occur sporadically, and the actual area of impacts would be small [relative] to the overall habitat available, and pile-driving noise would only occur over a relatively short period of time.” But there is no real information provided to support this statement. There is no analysis. There is no definition or explanation provided for “sporadically”. There is no information as to why the supposed sporadic nature of the pile driving would reduce impacts to less than significant levels. What does “relatively short period” mean? The DEIS indicates that the habitat area made inhospitable by pile-driving “is small in relation to the overall habitat available.” There is no explanation about how much habitat is actually affected. There is no discussion about the definition of the term “overall habitat available”? The DEIS ought to be refined so it provides the information the public needs in order to make assessments about the actual and expected effects of the project. The DEIS ought to make the required “hard look” that NEPA requires.	Section 3.3.2 of the FEIS has been updated on the discussion of potential impacts of pile driving noise.
0211-038	The DEIS focuses solely on the potential for the Project’s noise impacts to physically injure or kill fish and other marine animals. It is silent about the effects that change fish behavior, which ought to be included and discussed because changes in fish behavior tend to upset the life cycles and reproductive success of the species in question.	Section 3.3.2 of the FEIS has been updated on the discussion of potential impacts of pile driving noise, including sublethal impacts.
0211-039	The DEIS proclaims that the project’s construction-related noise impacts on fish could be mitigated through a variety of monitoring efforts. Monitoring, however, is only meaningful as a mitigation measure if it is tied to events that cause corrective action to be taken. There are no such thresholds set forth. No corrective measures are mentioned in case significant impacts are identified. This ought to be corrected.	Section 3.3.2 of the FEIS has been updated to include additional information on acoustic monitoring and adjustment of exclusion zones based upon acoustic monitoring during pile driving activities. Acoustic monitoring will be used to ensure that the minimum level of sound attenuation is achieved.
0211-040	Pages 3- 79 and 3-80, the DEIS discuss the Project’s operational noise impacts on fish without any assessment of wind turbine noise on fish. The DEIS does not analyze the wind turbine generators’ operational noise on fish. This needs to be corrected before the DEIS is made final.	Section 3.3.2 of the FEIS has been updated to include a discussion of potential effects of operational noise, and the effects of operational noise and of EMF have been added to Section 3.3.6 of the FEIS.
0211-041	[The] DEIS ought to describe adverse impacts on eel grass and other biotic resources from the coating of surfaces of the wind turbine generators [with] anti-fouling paint. Like most structures and boats that rest partially submerged in sea water, the underwater components attract barnacles and other sea creatures that attach themselves to hard surfaces. The most common method of eliminating and/or preventing such attachment is the periodic application of anti-fouling paint containing high concentrations of copper as an active ingredient. The copper is	Section 2.1.1.1 of the FEIS has been updated to discuss anti-fouling paint.

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	proven to have detrimental effects on eel grass and benthic flora and fauna. The DEIS does not disclose whether the project owner or operator will apply anti-fouling paint; nor does the DEIS analyze the impacts of such application. This should be addressed fully before the DEIS becomes final.	
0211-042	Recent studies show that off-shore wind turbine generators serve to increase water temperature. That will affect biotic resources. On page 3-14, the DEIS states that “[h]eat generated by power transmission has the potential to affect water temperatures, but it does not bother to analyze whether the proposed Project will cause water temperatures to rise in or near the wind turbine array and/or at the undersea transmission cables, affecting biotic resources, including fish. This should be addressed fully before the DEIS becomes final.	Sections A.8.2.1 in Appendix A and 3.2.2 of the FEIS have been updated to address heat from operating submarine cables. Appendix E, Section E.2.6, of the FEIS has also been updated to provide additional information related to the localized effects of offshore WTGs on air temperature.
0211-043	We see on page 3-15 Vineyard Wind would “be allowed to discharge untreated waste overboard.” We are not informed about the types or amounts of untreated waste that would be discharged into the water; nor does it analyze how such discharges may affect water quality or biotic resources. Although the DEIS states that the ballast water Vineyard Wind intends to discharge will be “uncontaminated,” there is not substantiation provided for that statement. Supporting documentation ought to be provided.	Note that the DEIS stated that Project vessels would “not be allowed to discharge untreated waste.” Section A.8.2.2 in Appendix A of the FEIS has been updated for a discussion of the types of allowable discharges Project vessels. Appendix B Table 1.3-1 of the FEIS has been revised to include an updated list of environmental permits and consultations. Section 2.1.1.1 of the FEIS has been updated to discuss ballast water management. Section A.8.2.1 in Appendix A of the FEIS has been revised to include an updated discussion of relevant regulatory requirements, including compliance with 33 CFR Part 151 Subpart D and 46 CFR 162.060.
0211-044	In order to address concerns by residents of Nantucket, Vineyard Wind publicly asserted that the system would be radar activated and only operate approximately 3-1/2 hours per year due to aircraft flying within the protected area. However, Vineyard Wind has privately confirmed to me that the system has not yet been approved by FAA or BOEM for use on the offshore turbines. Vineyard Wind says it is pushing for approval but ADLS has not yet been accepted for offshore use by Vineyard Wind. There’s no guarantee that the system will be approved for offshore use. While there are apparently other light reducing technologies and approaches that Vineyard Wind might investigate, but as of now the ADLS is their preferred option.	As stated in Section 3.9.2 of the FEIS, BOEM could require use of an ADLS as a mitigation measure for the Project. The FEIS has been updated to include the latest information as it relates to FAA and the implementation of ADLS.
0211-045	One of the obvious impacts of the proposed wind project is its effect on tribal viewscapes and related cultural resources in Nantucket Sound. The DEIS, however, does not really address this impact. On page 3-145 it states that the analysis of impacts on tribal resources will take place as part of the applicant’s (and BOEM’s) NHPA Section 106 consultation with the tribes. That consultation process has not yet taken place, so we are left with virtually no information on this critically important issue. NEPA does not allow a project applicant or a federal agency to defer analysis of such an impact, regardless of whether this	Section 3.8 of the FEIS has been updated to include the latest information related to the ongoing Section 106 consultation process.

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	same impact will be addressed in the future pursuant to some other federal law. This issue ought to be fully addressed before the DEIS is made final.	
0212-001	The catastrophic environmental impact of climate change due to increasing human-sourced carbon dioxide emissions, as stated in the October 2018 Intergovernmental Panel on Climate Change (IPCC) report, is real and imminent. According to the report, our earth must not exceed 1.5C of warming. If exceeded, the consequences will be devastating, leading to unprecedented sea level rise and worldwide climate disruptions. To avoid this dire prediction, a 45% reduction in carbon emissions would be required by the year 2030. Vineyard Wind’s proposed project is one significant step that can be taken to reduce carbon emissions.	Thank you for your comment.
0212-002	The Fisherman Advisory Board (FAB) has stated that fisheries, in the area of Vineyard Wind’s proposed project site, will be negatively affected by the construction and operation of the wind turbines. Of greater importance is the increased ocean temperature and acidification caused by carbon dioxide emissions, also mentioned in the IPCC report. Increasing ocean temperature and acidification will be detrimental to the vitality of the ocean fisheries. If ocean acidification and warming can be mitigated, by employing wind turbines, we may have a chance at saving the fisheries and the industries and livelihoods that depend on healthy oceans.	Thank you for your comment.
0213-001	As this project moves forward, I’d like to voice my concern that any potentially negative environmental impact be mitigated and minimized as much as possible, and that the strictest safety measures are determined and implemented throughout both the construction and lifespan of the farm.	Thank you for your comment.
0213-002	As is detailed in the DEIS, the North Atlantic right whale is a prime concern in this area. I’ve been heartened to see Vineyard Wind’s agreement with relevant NGOs to take measures to protect the right whale.	Section 3.4.2 of the FEIS has been revised in coordination with NMFS and includes the proposed mitigation and monitoring measures for marine mammals, which includes the incorporation of the Agreement with the NGOs. Furthermore, Section 3.4 and Appendix D of the FEIS include the draft Incidental Harassment Authorization measures proposed to be issued under the MMPA.
0213-003	I also appreciate the simulations of expected views from South Beach provided on BOEM’s YouTube channel. Unfortunately, it looks like the windmill farm is expected to be very visible in all seasons. I understand the expected number of windmills has already been reduced from the 100+ permitted to 84, and would ask to please pursue whatever can be done to reduce the impact of visibility when viewing the horizon from South Beach.	Section 3.9.2 of the FEIS discusses the Project’s visual impacts, and includes additional information not available in the DEIS.
0213-004	As a number of adjacent areas have been leased for future wind farms, and I understand a second project is already well on its way through the BOEM approval process, it’s all the more important to continually monitor this project, and potentially any future ones, through each stage and pause to reassess, reevaluate, and revise plans and processes as needed.	Thank you for your comment.

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0214-001	I fear the negative environmental impacts from the offshore wind turbines will have devastating consequences on the environment and all migratory species, including all that I currently fish for.	Sections 3.4.2 and 3.2.2 and Section A.8.6.2 (Appendix A) of the FEIS have been revised to address impacts on fishing resources.
0214-002	I believe this entire process needs to slow down and more monitoring needs to take place in order to calculate the severity of the environmental impacts. Not only are the commercial fishermen going to suffer the negative impacts, but the recreational fishermen as well and virtually all users groups both on and offshore.	Thank you for your comment.
0214-003	I have attended many meetings and have reached out to the VW liaison; unfortunately this has only furthered my mistrust with the project and the rapid approach [with] which it is being implemented.	Thank you for your comment.
0214-004	Vineyard Wind needs to begin to seriously discuss and take into account the negative impacts this project is going to have on the revenue loss of all the current users of the waters off of Massachusetts. The socioeconomic impacts on the local industries also needs to be taken into serious consideration.	Section 3.6.1 of the FEIS has been updated to include information for ocean economy employment data and Section 3.6.2 of the FEIS for employment in ocean economy sectors including commercial fishing.
0214-005	There is not enough discussion about how much this project is going to change every aspect of the ecosystem and our lives. Fishermen need to be compensated for the revenues they will lose not only during the construction but also throughout the lease as is described in its current plans. Environmental impacts will be caused by the wind turbines and will also affect areas outside the lease space, such as disturbing migratory patterns. These negative impacts also need to be part of compensation package.	Section 3.10 and Appendix D of the FEIS have been revised to include the Vineyard Wind's voluntary established gear loss and revenue compensation funds for fishing interests based in Rhode Island, Massachusetts, and other states. Please see Section 3.10 and Appendix D of the FEIS for more details on the measures.
0215-001	Most of us agree that climate change is happening now, and left unchecked the future is bleak. ...Phasing out oil and gas while phasing in renewable energy is key.	Thank you for your comment.
0215-002	Fair public process and stakeholder engagement is also key - just ask the proponents of Cape Wind, which was never built in the shallow waters of Nantucket Sound because opponents prevailed in the end. My sense is that over the past decade, BOEM has developed a framework that is far more responsive to stakeholders concerns than the Army Corps of Engineers approach with Cape Wind.	Thank you for your comment.
0215-003	Alternative Analysis: Initially, VW requested approval for the construction and operation of an 800-megawatt (MW) wind energy facility in federal waters off the coast of Massachusetts, 14 miles southeast of Martha's Vineyard Island. After the BOEM public hearing last week, it is clear that VW would prefer to install larger 9.5MW wind turbines (WT), reducing the number of WT to 84 rather than 106 (Alternative E). This will reduce the footprint of the project, a good thing in my view. I suggest that BOEM analyze all the Alternatives within the DEIS based on this substantive change.	Thank you for your comment.

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0215-004	Scale: The scale of VWs project in and of itself, in contrast to other developments in the Outer Continents Shelf (OCS), like oil and gas, is gigantic. The impact of VWs 84 turbines, each at nearly 700 feet and a mile apart has to also be assessed within the context of future projects. A few months ago all leases off the coast of MA were awarded to developers. Industrialization of our ocean is one way to describe what will happen if this project and all leased WEFs are developed, including those in states south of MA that are just starting the process. Assessing this project within the context of future projects is key.	BOEM has revised the list of reasonably foreseeable future offshore wind projects based on project progress since publication of the DEIS, and this information was included in the SEIS and carried forward to the FEIS. The list of reasonably foreseeable future offshore wind projects is included in Appendix A of the FEIS. In addition, updates were made to Chapter 1 and Appendix A of the FEIS, relying on the assessment methodology included in the SEIS.
0215-005	North Atlantic right whale (NARW) - Beyond habitat displacement, turbines can affect ocean geography - currents - zooplankton may diminish. This will likely have a negative impact on the critically endangered NARW, among other threatened and species.	Section 3.4.2 of the FEIS discusses the expected impacts on North Atlantic Right Whales. Further discussion of this species, and the expected Project-related impacts is provided in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/
0215-006	VW, in tandem with the development of other wind energy proposals in Massachusetts state and federal waters, as well as wind energy developments in other east coast states, may cause certain threatened species to become endangered, and in the case of the NARW, cause critically endangered species to become extinct. Under the ESA, a species listed as threatened triggers a series of protections that automatically go into effect. The DOI's recent rule changes for the ESA will mean that specific protections for threatened species will not be automatic; they will be decided on a case by case basis. My request is that BOEM will be consistent with past protocols and instruct government agencies to apply these protections to threatened species throughout the construction and operation of this project.	BOEM is consulting with NMFS and USFWS pursuant to the Endangered Species Act as described in Appendix C (formerly Chapter 4) of the FEIS and must comply with the current law and regulations.
0215-007	With respect to VW's NOI / COP, the comment period is only 30 days from the publication of the Federal Register Notice. The usual time frame to comment is 45-60 days, with the opportunity to extend the comment period if enough people requested more time. The fact that you have been flexible with regard to my late comments is not only appreciated, it is also reasonable with regard to fostering fair public process, engagement and transparency. DOI has not only reduced the time for public comment, but it has also reduced the length and the time-frame for the applicant / developer to prepare the final EIR - from 2 years to 1 year. The EIR has also been limited to 100 pages. Considering the scale and complexity of any offshore wind energy project, these limitations are not reasonable. The shorter EIR entails less information.	Thank you for your comment.
0215-009	Another concern regards the Endangered Species Act (ESA). As of April 26, 2018, new DOI guidance prohibits staff from telling developers / private interests that Incidental Take permits under the ESA are mandatory. This is problematic - why would a developer apply for a permit when it could limit the scope of their	Sections A.8.3.1, A.8.4.1 in Appendix A, 3.3.1, 3.4.1, and 3.5.1 of the FEIS include discussions of ESA listed birds, bats, finfish, marine mammals, and sea turtles, respectively. Additional discussions of these species including expected impacts and proposed mitigation and monitoring measures are provided in the

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	<p>project, or cost them money, or at the extreme, stop the project dead in the water? New definitions for “harm” and “harass” play into DOI’s new approach, and in my view will make it easier (legal) to harm and harass listed species and sensitive habitats. Considering the complexity of VW’s project, it is incumbent upon BOEM to make it clear that applicants are responsible for applying for Incidental Take permits during the preliminary scoping, construction, operation and decommissioning of any wind energy facility, especially considering the number of protected species and sensitive habitats associated with the project area. Critically endangered species, like the North Atlantic right whale (NArw), as well as a number of threatened species protected by the ESA will be at greater risk without the level of stewardship that the intent of the law affords. The Marine Mammal Protection Act is also undergoing changes, which will weaken protections for NArw, Fin whales and other marine mammals.</p>	<p>Biological Assessments submitted to USFWS and NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/</p>
0215-010	<p>Fishing and the fin fishery - The fact that an economic compensation program for fishermen is being offered is fair. At the same time, the fact that during construction, and possibly throughout the 30 year lease of the WEA there will be no fishing at all - this is a big trade-off. Fewer marine mammals and turtles will be entangled by pot fishing gear, but we do not know if the population of NArw, for example, will be further decimated by the industrial scale of this project, and future projects.</p>	<p>While access to the WDA will be restricted during construction, there will be no restrictions to fishing and navigation in the WDA during the operational life of the Project. Appendix D of the FEIS has updated the comprehensive list of mitigation and monitoring measure relative to marine mammals and sea turtles that are proposed to protect these species.</p>
0215-011	<p>Studies, data and monitoring: Data gaps because of lack of studies, on lobsters, whelk, benthic species in general, migrating birds, bats and insects, marine mammals, sea turtles and various species of fin fish in the marine environment, inland to Lewis Bay and off of Edgartown based on the transmission cable layout, is an ongoing concern. Deliberate efforts to gain more data, and at the same time be prepared to “walk-back” the project to re-assess location of turbines or cables, or stop the project has to be a priority. How will you establish a tipping point?</p>	<p>Appendix H of the FEIS includes a discussion on Incomplete or Unavailable Information for each resource.</p>
0215-012	<p>Ongoing survey work needs to be directed towards developing a more site-specific understanding of what species of concern are utilizing these WEAs and how they are dependent on the areas during different times of the year and phases of their life cycles. Ongoing monitoring efforts should be aimed at detecting how development activities alter the environment in the WEAs, and the biological and ecological impacts they produce. If impacts are egregious, what is the plan? BOEM will stop the project is what BOEM has stated. Also - surveys along the cable routes is imperative given the limited research on Electromagnetic Fields (EMF) on marine species.</p>	<p>Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. Additional mitigation and monitoring measures may arise from consultations and coordination with Federal and State resource agencies. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.</p>

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0215-013	Views and aesthetic concerns: VW would be about 13 miles off the coast of MV, so views are not the big issue that they were with Cape Wind. Views will be impacted, especially at night because of the lights. Vineyard and Aquinnah residents have expressed concerns. The Gay Head Cliffs, a National Landmark, will be forever changed. Some will look out and be thrilled because wind turbines (WTs) represent something very positive to them, based largely on promoting a renewable energy economy, and of course based on concerns over climate change. Others will be deeply saddened because to them utility scale offshore wind means detrimental impacts to recreational and commercial fishing, habitat loss, wildlife impacts, and industrialization of the marine environment. And seeing the blinking lights at night is not something a lot of people I talk to want to see.	Section 3.8.3 of the FEIS includes the details on the view from Gay Head Cliffs. In addition, Section 3.9.2 of the FEIS includes the information on the simulations views from Gay Head Light.
0215-014	Impacts to the cultural heritage and resources of the Gay Head Wampanoag Tribe of Aquinnah, and to all residents of MV, are also at issue, but are not within the scope of the DEIR. I mention this because more than ten years ago, the state of Massachusetts designated that the only commercial offshore wind energy development in state waters – three miles from shore - was off the Gay Head cliffs, a designated national landmark that is also central to the cultural heritage of the Tribe. Commercial wind off the Gay Head cliffs was opposed by many residents, and in the end, once the Fed began this process, the state assured Island officials and the public that developing commercial offshore wind in state waters would not happen. This was a welcome result, but the process that led to it was very contentious.	Section 3.8 of the FEIS has been updated to include the latest information related to the ongoing Section 106 consultation process. BOEM will not make a decision on Vineyard Wind's COP until the Section 106 process has concluded, which would allow BOEM to determine which are the available and most adequate mitigation measures if it was to decide to approve Vineyard Wind's COP.
0215-015	There is pending legislation to make Nantucket Sound a sanctuary. BOEM should use its authority under the OCSLA and other laws to designate Nantucket Sound as an area withdrawn from OCSLA leasing and development.	Thank you for your comment.
0215-016	To conclude, we have to look at this development project as an experiment - a laboratory. Phasing of construction, for example, will mean that habitat disturbance could potentially be extended by decades rather than years. How we address this is key. A threatened species is likely to become endangered in the foreseeable future based on current conditions. Constructing a wind energy facility that is bigger than Martha's Vineyard Island (MV) offers drastically different conditions that will inarguably have a negative impact on the marine environment. Understanding of ecosystems at this scale is uncharted territory.	Thank you for your comment.
0215-017	As mentioned, the cumulative impacts if a number of WEAs are developed up and down the east coast could intensify the negative impact on habitat and species which are already dealing with ongoing change attributable to factors such as climate change. It will be complicated.	Appendix A of the FEIS has been updated to include additional projects considered for impacts. This information was analyzed in the SEIS as well.

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0215-018	Offshore wind, at the scale that we are considering will alter the ecosystem, and therefore change the way of life of many different species, including human beings. An electric grid that pipes renewable energy rather than fossil fuels is a big gain - a positive change.	Thank you for your comment.
0215-019	My support for the project based on developing renewable energy to address global warming and climate change as well as community benefits, brokered in part by MV's local energy cooperative, Vineyard Power, is clear. Lower electric bills, jobs and workforce training, water quality remediation and NArw fund, monitoring and studies are real benefits.	Thank you for your comment.
0215-020	So far, Vineyard Wind is unique among the various developers requesting permits because they are partnering with Martha's Vineyard Island's local energy cooperative, Vineyard Power, with the first "Community Benefit Agreement" in the country. This partnership has facilitated outreach efforts to the Island community, which has garnered support for what is a controversial development project. Please note that I am a member of Vineyard Power.	Thank you for your comment.
0216-001	This region has received intensive field study over the past several years to assess the distribution, density and seasonality of the marine mammal, sea turtle fish and invertebrate species which inhabit it. These studies are important and indicate that acoustic and potential vessel strike impacts are moderate/significant for listed cetacean and sea turtle species (North Atlantic Right whale, Fin, Sei, Sperm whales, - Loggerhead, Leatherback, Green and Kemp's Ridley turtles). These impacts are going to be compounded if the Deep water Wind South Fork Project is approved and occurs concurrently. There is no accounting for these cumulative effects in the DEIS of either project. This needs to be addressed in a very substantial manner.	Section 3.4.1 of the FEIS has revised the discussion of marine mammals potentially present within the Project area. Further discussion of marine mammal seasonal occurrence and abundance is provided in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ . Section 3.3.8.3 of the DEIS included a discussion of acoustic and vessel collision impacts on sea turtles. Therefore, not change to the FEIS is warranted. Further discussion of sea turtle occurrence and acoustic impacts are provided in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ . Appendix A of the FEIS has been updated to include additional projects considered for impacts.
0216-002	The construction activities will produce an increase in low frequency ocean noise. This will cause chronic acoustic and physiological disturbance to many marine species over a period of years, affecting vast areas of the continental shelf currently excluded from these impacts. ... The long range that fin whales can receive vocalizations of conspecifics, other 'low frequency' calling cetaceans and potentially, large aggregations of prey, allow them to forage in a very opportunistic manner over vast areas....There has not been a designation of critical habitat for fin whales, but the shelf waters south of New England are a documented essential feeding area which may support a discrete subset of the western North Atlantic stock. Passive acoustic data shows seasonal movements to the sub-tropical North Atlantic where breeding and calving may occur. Some fin whales remain in northern waters throughout the winter months. Recent passive	Section 3.4.2 of the FEIS has revised the discussion of acoustic impacts on marine mammals. Further details regarding acoustic effects to these species are provided in Appendix F of the FEIS and in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ .

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	acoustic data reveal the 20 Hz. pulse calls of fin whales in Arctic Canada, southern New England, the New York Bite and the mid-Atlantic Coastal region through the winter months...This makes these areas crucial for aspects of reproductive behavior as well as foraging for fin whales. The proposed development will have broad acoustic impacts on several hundred square miles south of Martha's Vineyard. Deepwater Wind's South Fork projects will simultaneously impact the Cox Ledge region. The required power cable routes increase the loss of foraging habitat and communication space. Together they will impact large areas very important to fin, humpback, Minke and North Atlantic Right whales. The number of proposed turbines will entail months of noise associated with their construction. Pile driving for these will produce a significant elevation in ambient low-mid frequency noise. This will cause population level habitat changes for these species. Access to food resources and areas used for important courtship/reproductive behavior will be impaired or lost for the duration of the activity. You have received excellent guidance on the issues facing marine mammals from the Marine Mammal Commission.	
0216-003	In addition I would like to emphasize the fact that, the proposed plans for construction activity include working during the month of August. This may be acceptable for limiting potential seasonal interactions which are likely to affect right whales, but August is an active month for fin, humpback and Minke whales most years. I would strongly urge that pile driving and other high impact acoustic activity be avoided through the first week of September.	Section 3.4.2 and Appendix D of the FEIS has updated the discussion of monitoring and mitigation that has been proposed for the agency-preferred alternative relative to the North Atlantic right whale. All Project-specific avoidance, minimization, and mitigation measures, including time-of-year restrictions, will be developed in coordination with the NMFS as part of the ESA Section 7 consultation.
0216-004	The Recovery Plan for the Fin Whale and the current Population Assessment list ship strikes and habitat degradation as significant threats to the long-term recovery and viability of the species. All efforts to minimize these should be considered and implemented as these major decisions are made.	Section 3.4.2 and Appendix D of the FEIS has updated the discussion of monitoring and mitigation that has been proposed for the agency-preferred alternative. Pre- and post-construction monitoring plans, if required, will be developed in coordination with the NMFS as part of the ESA Section 7 consultation.
0216-005	I also feel that the option for the taller turbines is not appropriate for these sites. Taller towers will have a greater potential to impact migrating passerine birds which travel the Atlantic Flyway nocturnally.	Section A.8.3.4 in Appendix A of the FEIS has updated the discussion on use of fewer, larger WTGs.
0217-001	The Vineyard Wind has published its Environmental Impact Statement (EIS), which the surfclam and ocean quahog (SCOQ) fishery finds inadequate, incomplete and does not address the key issues of how much harm their proposed development of an 800 MW wind farm will cause the commercial fishermen who fish in the Atlantic Ocean off of Martha's Vineyard, MA...However, if construction is permitted as currently designed there is going a huge negative impact on the clam industry and other commercial fishers because the turbines are located too close together to allow large fishing vessels to operate within the farm. This along with other wind energy development in Rhode Island Sound is	Sections 3.10.1 and 3.10.2 of the FEIS have been revised to include additional analysis of impacts on Surfclam/Ocean Quahog. In addition, Section 3.10 of the FEIS has been updated to further address the potential concerns related to fishing and traversing the WDA.

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	going to cause great financial harm to commercial fishing interest in the area without any consideration for fisheries that will be cut off from tens of millions of dollars in income every year that the wind farms are in operation.	
0217-002	Vineyard Wind and other wind farm developers are unwilling to design their arrays with their turbines two Nautical Miles (NM) apart and with the rows aligned with the bottom contours, in line with each other in both directions and set so the tide runs straight through the lines of the turbines and not at an angle. With the turbines set at 0.7 NM or even 1 NM apart and in some cases the lines are staggered from one turbine line to the next, there is no way that a 70 foot plus, bottom tend mobile gear fishing vessel can safely operate within the array. With the two NM arrangement, fishing could take place within the farm and the layout would solve the transit lane problems. However, the wind farm developers are unwilling to change their design or consider compensation for the loss of fishing grounds and income or the safety of the vessels attempting to transit the wind farms.	Section 3.10 of the FEIS has been revised to provide additional information related to the use of the Project area by vessels with the WDA. Section 2.5 of the FEIS has been included to identify the agency-preferred alternative. In addition, Section 3.10 of the FEIS has been updated to further address the potential concerns related to fishing and traversing the WDA. Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures including voluntary financial compensation. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0217-003	Once the arrays are built, in their current configuration, clam vessels will be unable to fish within the array. The clams are not going to move but the developers say that the negative impact is only going to be moderate on the clam fishery...The negative impact is going to be severe and the developers brush off the idea that they have any responsibility for compensation for loss fishing grounds or income.	Section 3.10 of the FEIS has been revised to provide additional information related to the use of the Project area by vessels with the WDA. Section 2.5 of the FEIS has been included to identify the agency-preferred alternative. In addition, Section 3.10 has been updated to further address the potential concerns related to fishing and traversing the WDA. Section 3.10 of the FEIS has been updated to include details of mitigation and monitoring measures relative to commercial fisheries, including voluntary financial compensation. Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0217-004	Moreover, the federal government suggests that wind farm development is going to provide billions of dollars and thousands of jobs in the construction phase. However, someone in the government forgot to tell the U.S. public that this country does not have the ability to build these large turbines or blade, and does not have the equipment to install them. All of those functions and money is going to Europe and China companies and the only thing that the U.S. consumers receive is much higher electric bills. It is inconceivable that a well-informed public would think that this is a great deal for the United States. It simply undermines the ocean fishing industry because there is no consideration in the farm's design or compensation for U.S. fishermen that incur losses while enriching very large European corporations.	Section 3.10.2 of the FEIS has been revised to include a discussion of displacement and potential conflict over fishing grounds and voluntary compensation. Section 3.10 of the FEIS has been updated to include details of mitigation and monitoring measures relative to commercial fisheries, including voluntary financial compensation. Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0217-005	The clam fishery and other members of the offshore fishing industry have attempted to work with the wind energy developers so that both industries can coexist, however, every developer has rejected compromises in wind farm design	Section 3.10.2 of the FEIS has been revised to include a discussion of displacement and potential conflict over fishing grounds and voluntary compensation. Section 3.10 of the FEIS has been updated to include details of

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	and compensation for lost income. How can the federal government justify selling out the U.S. offshore commercial fishing industry to companies who are only concerned with what they can return to their European shareholders? While the U.S. fisheries lose access to traditional fishing grounds that drives up their cost of operating and reduces their income. The developers are not going to provide any relief to the commercial fishing industry. There is one exception; the government does require the developers to hire a fishery liaison person to be the go-between with the developers and fishermen. Those who take the jobs have the dubious honor of telling the fishermen what the developers want and what they are going to do. The developers are going to do as they please and the federal government is going to allow them to do so. The U.S. fishermen are going to lose their fishing grounds and are not going to be compensated.	mitigation and monitoring measures relative to commercial fisheries, including voluntary financial compensation. Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0217-006	Vineyard's Environmental Impact Statement states that the bivalve (clam and scallop) industries will be negatively impacted but when the developers are confronted with the facts, they do nothing. The reason nothing is being done is that the federal government will not require the developers to do anything that would slow down or cause the wind developers to be unhappy. The government is unwilling to require changes in the design of the farms or compensation fishermen for their loss of fishing grounds and opportunity to make a living....The federal government must reject Vineyard Wind's Environmental Impact Statement and force changes to protect the other users of the open ocean.	Section 3.10.2 of the FEIS has revised the discussion of commercial fisheries, including expected impacts and proposed monitoring and mitigation measures relative to these resources. Further discussion of these monitoring and mitigation measure, including voluntary financial compensation for direct impacts on commercial fisheries, is provided in Appendix D of the FEIS.
0218-001	The DEIS refers to two offshore and onshore export cable route (OECRs) options, referred to by the associated cable landing sites at Covell's Beach in the Town of Barnstable and New Hampshire Avenue in the Town of Yarmouth. It is our understanding that Vineyard Wind has revised its preferred alternative to favor a landing site at Covell's Beach over the proposed landing site at New Hampshire Avenue and is now their preferred and intended route. This change to the Covell's Beach landing site reduces the length of the total offshore cable route by approximately 4.5 miles and eliminates the need to cross the existing Nantucket Cable. This shorter offshore cable route will therefore reduce impacts that are proportional to cable length, as well as eliminating potential long term detrimental impacts in Lewis Bay that include impacts to benthic resources, and disruption to commercial fishing, shellfish aquaculture, subsistence fishing, marine businesses, tourism, recreation, anchorage, maintenance dredging, and future improvement dredging.	The revised COP would permit landfall only at Covell's Beach and would use HDD. The FEIS has been revised accordingly.
0218-002	The Town continues to have concerns with the New Hampshire Avenue landing site alternative due to the following potential impacts: • Impacts to benthic resources in Lewis Bay from direct mortality, sedimentation, dredging and entrainment, and scouring; • Impacts to finfish, invertebrate and fish habitat resources in Lewis Bay from turbidity, sedimentation, direct mortality, noise,	The revised COP would permit landfall only at Covell's Beach and would use HDD. The FEIS has been revised accordingly.

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	<p>electromagnetic frequencies, habitat disturbance, and conversion; • Impacts on commercial fishing, subsistence fishing, aquaculture and disruption of marine businesses in Lewis Bay, including impacts on wild stock shellfish, propagated shellfish, shellfish aquaculture leases, and recreation activities; • Construction impacts onshore, offshore, and in boating areas on recreation and tourism activities; • Impacts due to onshore construction noise, dust, and traffic flow disturbances; • Impacts to navigation and vessel traffic in Lewis Bay during construction, an existing mooring field, and a short term and storm anchorage basin; • Impact of the buried cable on future Town improvement dredging projects seeking to improve the flushing of Lewis Bay, to improve water quality and aquatic ecosystems; • The 2015 Massachusetts Ocean Management Plan purposefully omits Lewis Bay as an acceptable site for an offshore wind transmission cable landing; and • Conflicts between the buried cable duct bank the Town’s future plans for sewer installation and existing water supply infrastructure.</p>	
0218-003	<p>The Town of Yarmouth respectfully requests the following items be addressed and agreed upon by the Vineyard Wind should the New Hampshire Avenue cable route and landing site remain an alternate to Covell’s Beach. If the New Hampshire Avenue cable route and landing site again becomes the preferred alternative we would request that the company be required to provide the following: • A detailed pre-project environmental, water quality, and habitat study of the whole of Lewis Bay shall be completed to establish a baseline to assist in proper post-project monitoring and remediation of the impacted estuary; • The Proponent shall be required to provide compensation for any impacts to shellfish and shellfish habitat and associated commercial and recreational impacts; • Horizontal direct drilling (HDD) shall be required for laying the cable to New Hampshire Avenue due to the reduced impact to the benthic habitat; • Adequate containment measures for any hazardous materials/liquids associated with the cable installation both offshore and onshore, including equipment refueling, shall be included in the project design; • Provide compensation for short term and long term loss of shellfish populations, shellfish habitat, recreational, commercial and aquaculture stocks, and days fished based on historic and preconstruction surveys; • Financial assurance shall be provided by the proponent shall include costs associated with safety measures for addressing unintended or unforeseen consequences during the construction and operation life time; • The state or the appropriate agency shall limit the landfall capacity to not allow for further cable capacity, to prevent any future known or unknown utility to utilize any unused bank capacity. This includes any capacity that is proposed for reserve in case of a cable break or other issues that may arise; and • That the proponent be required to reimburse municipalities where a landfall and cable</p>	<p>Section 3.10.2 of the FEIS has been revised to include a discussion of displacement and potential conflict over fishing grounds and voluntary compensation. Section 3.10 of the FEIS has been updated to include details of mitigation and monitoring measures relative to commercial fisheries, including voluntary financial compensation. Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision. In addition, the revised COP would permit landfall only at Covell’s Beach and would use HDD. The FEIS has been revised accordingly. Section 2.5 of the FEIS has been included to identify the agency-preferred alternative.</p>

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	route of the Vineyard Wind Connector are proposed in order to cover the extensive review costs, to include, but not limited to, legal, engineering; environmental; coastal geologist; maritime or any other appropriate consultant providing expertise in reviewing the proponent’s project so as not to burden the taxpaying public of the Town of Yarmouth or other communities for a private entitled financial benefit.	
0219-001	Please consider using the WESTERN corridor to bring the line north. The eastern route is one of the few hard bottom areas to the south of the Islands.	Hard-bottom habitats along the two Muskeget Channel Options, as well as the differences in potential impacts between the two and the process used for route selection, have been updated in Sections 3.1.1, 3.1.2, and 3.2.2 of the FEIS.
0220-001	Have you done studies on the unintended impact on the erosion of our south shore? What are they?	Appendix E of the FEIS has been updated to include additional information regarding the oceanographic environment, including the potential impacts on mean flows near offshore wind foundations. Information related to potential changes in mean flows provides implications for shoreline erosion. Section 3.3.2 of the FEIS has been updated to explain that background hydrodynamic conditions would exist approximately 328 feet (100 meters) from each monopile foundation.
0221-001	I’m in support of this project and offshore wind in general. However, I am concerned about managing disposal of waste during installation & maintenance processes.	As stated in the DEIS Section 3.2.2 (A.8.2 in the FEIS), waste from the proposed Project would not be disposed at sea except for clean or treated water. Therefore, no changes to the FEIS are warranted.
0221-002	Also, I am concerned that there must be a means by which the public can oversee & have a say about the prices of this energy. For the purpose of preventing price gouging.	Thank you for your comment.
0222-001	I am in support of this project but feel we must focus on the impacts the installation vessels and practices may have on the marine ecosystems. Offloading of waste into the ocean should be strictly monitored from vessels. Minimal chemicals that may harm marine animals should [be] used.	As stated in the DEIS Section 3.2.2 (A.8.2 in the FEIS), waste from the proposed Project would not be disposed at sea except for clean or treated water. Therefore, no changes to the FEIS are warranted.
0223-001	Cable laying: To my knowledge, no sediment testing has been done to determine how contaminated the sediment is.	Sections A.8.2.2 in Appendix A and 3.2.2 of the FEIS has an updated discussion of current information on sediment contaminants and plans for future testing.
0223-002	Dredging & any disposal is governed by EPA & Army Corps. Why has EPA not been contacted?	Appendix C (formerly Chapter 4) of the FEIS has been revised to state USEPA is a cooperating and co-action agency for the EIS. The proposed Project does not entail any dredging or disposal that would require a permit from USEPA.
0223-003	Why is NOAA NMFS not at these meetings?	The Memorandum of Understanding Implementing One Federal Decision Under Executive Order 13807 outlines the roles and responsibilities of the lead, cooperating, and participating agencies as described in Chapter 1 of the FEIS. BOEM, as the lead federal agency, is responsible for organizing the federal environmental review and authorization processes for a proposed project, including the preparation of a single EIS and ROD for the project in coordination with the other federal cooperating agencies. BOEM was therefore responsible for

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		leading the scoping and public hearing meetings and other agencies are welcome to attend.
0224-001	Pile driving results in fish kills: it wipes out fish otoliths & ruptures swim bladders. Clear mitigation & monitoring has not been outlined. I advised last year to phase this. A giant fish kill will alarm a whole lot of people.	Section 3.3.2 and Appendix D of the FEIS discusses noise reduction technologies proposed for use during pile driving activities. The proposed use of noise reduction technologies will be employed to ensure a minimum attenuation of 6 dB, resulting in reduction in the areas affected by Project-related noise impacts.
0225-001	Climate change technology must be sustainable. We cannot jeopardize jobs, fisheries, whales and livelihoods for an agenda. Block Island was 5 turbines. Proposed is 106. Comparing a handful of twigs to bushel of apples. This must be taken into consideration.	Thank you for your comment.
0226-001	Our country needs environmentally friendly energy. It does not need offshore oil & gas exploration. Please help make Vineyard Wind happen.	Thank you for your comment.
0227-001	As the author of a book about climate change, I totally agree that we need to make use of as much wind energy as possible. That said installation and operation needs to respect the needs of fishermen, all marine animals and bird life. Please take great care to address all of these needs and we will all benefit.	Thank you for your comment.
0228-001	Renewable energy is the future. The detrimental effects of carbon emissions is destroying our environment. Sea level rise, species extinction, tick borne disease, are just some of the ways our planet is being negatively impacted by a warming planet. Conservation---Decreasing our carbon footprint is critical for our survival.	Thank you for your comment.
0231-001	Vineyard Wind (VW) has presented their Environmental Impact Statement (EIS) to BOEM, which the surfclam and ocean quahog (SCOQ) fishery finds inadequate, incomplete and does not address the key issues of how much harm their proposed development of an 800 MW wind farm will cause the commercial fishermen who fish in the Atlantic Ocean off Martha's Vineyard, MA....If the wind farm construction is permitted as currently designated there is going to be a huge negative economic impact on the clam industry and other commercial fishers because the turbines are located to close together to allow large fishing vessels to operate with in the array. VW along with other wind energy development in the Rhode Island Sound are going to cause great financial harm to commercial fishing interest in the area without any consideration for fisheries that will be cut off from tens of millions of dollars in income every year once the wind farms are in operation.	Section 3.10.1 of the FEIS provides new information on this resource and Section 3.10.2 of the FEIS for analysis of impacts on surfclam/ocean quahog. Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. Additional mitigation and monitoring measures may arise from consultations and coordination with Federal and State resource agencies. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0231-002	VW and other wind farm developers are unwilling to design their arrays with their turbines two Nautical Miles (NM) apart and in rows aligned with the bottom contours, are in line with each other in both directions and set so the tide runs straight through the turbines and not at an angle. The smaller turbines were	Section 3.10 of the FEIS has been revised to provide additional information related to the use of the Project area by vessels with the WDA. Section 2.5 of the FEIS has been included to identify the agency-preferred alternative. Additionally, Section 3.10.2 of the FEIS has been revised to include a discussion of

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	originally set at .7 NM apart, now the larger ones are set at one NM apart. There are turbine layouts where the turbines are staggered from one turbine line to the next. There is no way that a 70-foot plus fishing vessel, towing bottom tend mobile gear can safely operate within the array even with the turbines set at one NM apart. With a two NM turbine arrangement, limited fishing could take place within the wind farm and the layout would solve the transit lane issue. It is understood that if the turbine layout were two NM by two NM that the least area would not hold 8409.5MW turbines. It could be acceptable to have the turbines with just a little less distance (than 2 NM) between them to get 800 MW by using the entire lease area...Some developers have balked at considering compensation for the loss of fishing grounds and income.	displacement and potential conflict over fishing grounds and voluntary compensation. Section 3.10 of the FEIS has been updated to include details of mitigation and monitoring measures relative to commercial fisheries, including voluntary financial compensation. Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0231-003	...VW has not even consider the safety of the vessels attempting to transit their wind farms. If the turbines were set at just a little less than two NM in straight lines and set east and west, a system could be installed where very other row could be one way, the next row over would be one way in the opposite direction. For the vessels that want to get north and south, a similar traffic pattern could be established. Using AIS vessels on intersecting courses like one vessel going east and another going north, the one that does not have the right of way could slow down before getting to the intersection to allow the other to pass.	Section 3.11.1 of the FEIS includes clarifications to vessel traffic in the WDA, while Section 3.11.2 of the FEIS has been revised to include an expanded discussion of the impacts on navigation through the WDA.
0231-004	When looking at the fact that fishing jobs are going to be lost, shore jobs are going to be lost and the consumer is going have huge increases in their electricity cost. To make things worst all of the jobs building and installing the wind farms are going to European companies. The US fisherman and the seafood factory workers are the losers with no compensation or consideration.	Section 3.10.2 of the FEIS has been revised to include a discussion of displacement and potential conflict over fishing grounds and voluntary compensation. Section 3.10 of the FEIS has been updated to include details of mitigation and monitoring measures relative to commercial fisheries, including voluntary financial compensation. Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0231-005	Once the arrays are built, in their current configuration, clam vessels will be unable to safely fish within the array. The clams are not going to move but the developers say that the negative impact is only going to be moderate on the clam fishery...The negative impact is going to be severe and the developers brush off the idea that they have any responsibility for loss fishing grounds, jobs, or income for the fishing vessels or the factory's that process them.	Section 3.10.1 of the FEIS provides new information on this resource and Section 3.10.2 of the FEIS for analysis of impacts on surfclam/ocean quahog. Section 3.10.2 of the FEIS has been revised to further discuss the potential concerns related to maneuverability, access within the WDA and continued ability to fish within the WDA.
0231-006	No large survey vessels will be able to safely operate within the arrays. This will cause the Northeast Fisheries Science Center not to have the scientific data needed for these areas, which could cause the quotas to be lower. The lack of data from the wind farms makes it much more problematic in calculating the species total biomass. That lack of information will end up leaving big holes in the data that will cause each fishery big problems with their quota....When all of the areas	Section 3.12 of the FEIS has been revised to provide additional clarification regarding survey efforts potentially impacted by the proposed Project. Section 3.10 of the FEIS has been revised to further discuss the potential concerns related to maneuverability, access within the WDA and continued ability to fish within the WDA.

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	have been leased along with these that will be leased in the future, there will be thousands of square miles of fishing grounds that cannot be fished.	
0231-007	...the federal government suggests that the wind farm development is going to provide billions of dollars and thousands of jobs in the construction phase. However, someone in the government forgot to tell the U.S. public that this country does not have the ability to build these large turbines or blades, and does not have the equipment or crews to install them.	Section 3.6.2 of the FEIS discusses the potential beneficial impacts of the proposed Project, including the requirement of a local hiring plan that would include hiring of southeastern Massachusetts residents.
0231-008	The clam fishery and other members of the offshore fishing industry have attempted to work with the wind energy developers so that both industries can coexist, however, every developer has rejected compromises in wind farm design and compensation for lost income because it will cost them more money....How can the federal government justify selling out the U.S. offshore fishing industry to companies who are only concerned with what they can return to their European shareholders? While the U.S. fisheries loose access to traditional fishing grounds that drives up their cost of operating and reduces their income. The developers are not going to provide any significant relief to the commercial fishing industry. There is one exception; the government does require the developers to hire a fishery liaison person to be the go-between with the developers and fishermen. Those who take those jobs have the dubious honor of telling the fishermen what the developers want and what they are going to do. The developers are going to do as they please and the federal government is going to allow that to happen. The U.S. fishermen are going to lose their fishing grounds and are not going to be compensated.	Section 3.10.2 of the FEIS has been revised to include a discussion of displacement and potential conflict over fishing grounds and voluntary compensation. Section 3.10 of the FEIS has been updated to include details of mitigation and monitoring measures relative to commercial fisheries, including voluntary financial compensation. Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0231-009	Vineyard's Environmental Impact Statement state that the bivalve (clam and scallop) industries will be negatively impacted but when the developers are confronted with the facts, they do nothing. The reason nothing is being done is that BOEM is unwilling to require the developers to do anything that would slow down their project. The government is also unwilling to require changes in the design of the farms or meaningfully compensation for fishermnen for their loss of fishing grounds and opportunity to make a living.	Section 3.10 and Appendix D of the FEIS have been revised to include the Vineyard Wind's voluntary established gear loss and revenue compensation funds for fishing interests based in Rhode Island, Massachusetts, and other states. Please see Section 3.10 and Appendix D of the FEIS for more details on the measures.
0231-010	New leases must have more requirements so that the extra cost is built into the lease prices. With no mitigation or compensation in the lease requirements, the other users of the ocean and the communities pay the price.	Section 3.10.2 of the FEIS has been revised to include a discussion of displacement and potential conflict over fishing grounds and voluntary compensation. Section 3.10 of the FEIS has been updated to include details of mitigation and monitoring measures relative to commercial fisheries, including voluntary financial compensation. Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.

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0231-011	BOEM must require any lease that shares a common border with another lease to have the developers design their arrays so that the two are laid out so the turbines are in line with each other and are spaced out the same way.	The decision before BOEM is to determine whether to approve, approve with modifications, or disapprove the COP submitted by Vineyard Wind to construct, operate, and decommission an approximately 800 MW commercial-scale wind energy facility within Lease Area OCS-A 0501. The concern raised in the comment on layout of turbines with shared boundaries would be considered by BOEM during the review of other future COPs.
0231-012	Research and monitoring are required to document the negative impacts of the wind arrays and cables and they must be monitored on a yearly basis or shorter period.	Appendix D of the FEIS has been revised and includes a comprehensive list of all monitoring and mitigation measures, including cable placement monitoring, proposed for the agency-preferred alternative.
0231-013	All wind farms must install 20 MW turbines, which would make the developers space them about two NM apart so the wake from the first one is gone when the wind gets to the turbine behind it.	The SEIS and the FEIS evaluate the potential for larger turbines, particularly for future offshore wind projects. BOEM's evaluation of effects of the proposed Project is based off the information included in Vineyard Wind's COP, which considers commercially available turbine sizes.
0231-014	Cables must be buried at least 2 to 3 meter. Every year all cables must be surveyed to confirm their burial depth is within the specification. After every major storm, the cables must be inspected to confirm they are at the right depth. Any area where the cable is not at the proper depth, the operator must rebury the cable quickly.	The OECC would have a target burial depth of up to 5-8 feet (1.5-2.5 meters) as described in Section 2.1.1.1 and Appendix G of the FEIS. Post-construction monitoring of the OECC is discussed in Appendix D of the FEIS.
0231-015	Decommission is required within one year from ending operation of a turbine. Removal all parts and equipment that were put there in serves of the turbines and cables and their protection mats must be removed within a year...	As described in Section 2.1.1.3 of the FEIS, pursuant to 30 CFR Part 585 and other BOEM requirements, Vineyard Wind would be required to remove or decommission all installations and clear the seabed of all obstructions created by the proposed Project. Vineyard Wind would need to obtain separate and subsequent approval from BOEM to retire any portion of the Proposed Action in place.
0231-016	Fishery science, environmental, and habitat changes must be studied and documented before construction start to set a base line. Once in operation and thereafter on at least a yearly basis the entire area must be monitored by a third party to document the changes and after decommission the area needs to be studied and compared with the original documents. Fishery, environmental, and habitat changes that have take place must be restored to their original state at the developers expenses.	Appendix D of the FEIS has been updated and includes a comprehensive list of all monitoring and mitigation measures, including pre-, during, and post-construction monitoring, proposed for the agency-preferred alternative.
0231-018	Cumulative impacts are going to be very harmful to Rhode Island Sound. Once all of the lease areas are build out, most of the fishing grounds will not be fishable unless the turbines are spread out to allow safe fishing operations and transit within the arrays. If that does not happen and the turbines are close together, all of the communities in southern New England will be severely negatively impacted. The fishing opportunities are going to change as well as the habitat and the total environment of the sound will be altered. The fishing, transit zones, and	Section 3.6 of the FEIS has been revised to include an expanded discussion of how local communities and businesses could be impacted by the Project. Section 3.10 of the FEIS has been revised to include an expanded discussion of the Project's impacts on commercial fisheries. Section 3.11.2 of the FEIS has been updated to further describe navigational risks for vessels within the WDA as well as impacts on vessel traffic to ports. Appendix A of the FEIS has been updated to include additional projects considered for impacts.

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	marine environment will change for the worst, all for the consumer’s privilege of very expensive electricity.	
0232-001	Page 2-16: In the unnumbered paragraph entitled “Two Nautical Mile Transit Corridor through the WDA”, BOEM may consider noting in the FEIS that the Coast Guard may conduct a study to determine safe navigation routes, if any, appropriate to the entire MA/RI wind energy area. That study, if conducted, is expected to be completed by early fall of 2019.	Sections 2.1.1.2 and 3.11 of the FEIS have been updated to discuss the 2-nautical-mile-wide northeast-southwest navigational safety corridor identified by the Massachusetts Fisheries Working Group on Offshore Wind, as well as USCG’s Final MARIPARS. Section 3.9.2 of the FEIS has been updated to address navigational preferences of recreational fishermen near or within the WDA. Sections 3.11.1 (vessel traffic in the WDA) and 3.11.2 (impacts on navigation through the WDA) of the FEIS have been updated to further discuss this topic.
0232-002	[In the unnumbered paragraph entitled “Two Nautical Mile Transit Corridor through the WDA”] the reader is directed to section 2.1.1.2 of the DEIS for a discussion of fisheries navigation concerns on a regional basis; however, that section (2.1.1.2) addresses operations and maintenance, not fisheries.	Sections 2.1.1.2 and 3.11 of the FEIS have been updated to discuss the 2-nautical-mile-wide northeast-southwest navigational safety corridor identified by the Massachusetts Fisheries Working Group on Offshore Wind, as well as the USCG’s Final MARIPARS. Section 3.9.2 of the FEIS has been updated to address navigational preferences of recreational fishermen near or within the WDA. Sections 3.11.1 (vessel traffic in the WDA) and 3.11.2 (impacts on navigation through the WDA) of the FEIS have been updated to further discuss this topic.
0232-003	As the Lewis Bay cable-landfall component of the project is distinctly different from the main project, and is temporary, perhaps a separate alternative that addresses only Lewis Bay may be beneficial to more accurately describing the navigation impacts to the main permanent project...Separating the assessment of potential navigation impacts to the actual wind farm area (where impacts maybe expected for the duration of the facility) from the two landfall alternatives (where impacts can be expected to be temporary, during installation) may provide a more accurate assessment of overall impacts.	As specified in Section 2.1 of the FEIS, the DEIS and SEIS contemplated two Onshore Export Cable Routes (OECRs), with alternative options within each route; however, since the publication of those documents, Vineyard Wind has stated all necessary state and local permits for the Covell’s Beach landfall location have been acquired. Therefore, the Proposed Action (Alternative A) and action alternatives only contemplate the one landfall location, Covell’s Beach landfall and onshore route. Alternative B therefore is no longer evaluated as an action alternative in this FEIS. In addition, Section 2.5 of the FEIS has been included to identify the agency-preferred alternative.
0232-004	In pre- post-application discussions with both BOEM and Vineyard Wind the Coast Guard has consistently advocated for fewer (presumably larger) turbines at greater consistently-spaced intervals laid in a symmetrical pattern. It appears that Alternative E, in conjunction with Alternative D2 or D1, would offer the least adverse impact to navigation safety and vessel traffic within the lease area.	Section 2.5 of the FEIS has been included to identify the agency-preferred alternative.
0232-005	In any permit that BOEM may issue relative to the Vineyard Wind COP, the Coast Guard may recommend inclusion of a number of mitigations to reduce further risks to navigation safety. The recommended mitigations will likely be similar to those contained in the Coast Guard’s “Terms and Conditions” issued for the Cape Wind project proposal ² , and those included in the Army Corps of Engineers permit issued for the Block Island Wind Farm. Provided such recommended mitigations are included as conditions of any BOEM permit to	Section 3.11 of the FEIS has been updated, where feasible, to describe the preliminary USCG conditions.

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	Vineyard Wind, a project built in conformance with Alternative E combined with Alternative D2 or D1 should provide for a minimum or moderate negative impact to navigation.	
0232-006	In January 2019 Vineyard Wind submitted a “Supplementary Analysis for Navigational Risk Assessment”. The Supplementary Analysis is based on a “reduced footprint” of 84 turbines spaced 0.9NM apart in a NW/SE axis, and one-to-two electric service platforms. This seems to suggest that Vineyard Wind has essentially adopted Alternative E as a new “Proposed Action.” If so, the “Maximum-case scenario,” of this alterative would appear to be significantly less severe than that described in Table G-3 of the DEIS.	The development of the EIS has been based on Vineyard Wind’s utilization of the PDE, which included a range of 8-10 MW WTGs as assessed in the DEIS and was updated to allow for up to 14 MW WTGs. The FEIS assesses the impacts of the reasonable range of Project designs that are described in the Vineyard Wind COP and presented in Appendix G by using the “maximum-case scenario” process. Therefore, utilization of the 9.5 MW machine falls within the PDE and impacts have been accounted for. As such, no change to the FEIS was warranted.
0232-007	...the projected impacts to navigation from this latest (84 turbine) revision to the project (as described in the Supplementary Analysis Tables 3.1 and 7.1, risk assessment pre- and post- mitigation, respectively) appear to be less severe than projected impacts from the current proposed action, Alternative A.	Thank you for your comment.
0232-008	Subsection 3.4.4.3... Page 3-150... The Coast Guard does not determine appropriate cable burial depths. However, we may recommend to BOEM that it include as a condition to any permit issued to Vineyard Wind that a detailed submarine cable system burial plan shall be submitted that depicts the precise location and burial depths of the entire cable system. The plan would be reviewed by the Coast Guard and approved by the BOEM before construction of any component of the wind farm begins.	BOEM will continue to coordinate and consult with USCG on the overall project.
0232-009	Page 3-204. In the unnumbered paragraph [on page 3-204] entitled “Aids to Navigation” buoys are described by color....The buoys should be more precisely identified by their charted designation to avoid any ambiguity.	Section 3.11.1 of the FEIS has been updated to include the charted designations of the two buoys.
0232-010	Page 3-204. In the unnumbered paragraph entitled “Aspects of Resources Potentially Affected”, under the bullet labeled “Safety” [and in relevant sections of the DEIS] it should be noted that the presence of WTGs and ESPs in the WDA could impact Coast Guard search and rescue resources, policies, and practices.....due to potential changes in vessel traffic patterns and possible increases in vessel density (e.g. vessels avoiding the wind farm but transiting close to its edge, or recreational fishing vessels congregating at bases of WTGs, etc.)...changes in waterways and users, especially potential changes to commercial fishing methods (fixed and mobile) an complexity), could be a consequence of the Vineyard Wind project and could impact Coast Guard search and rescue demand.	Sections 3.11.1 and 3.11.2 of the FEIS have been revised to further discussion impacts on SAR resources.
0232-011	...pre-and post-construction impact assessments to the Coast Guard’s “Rescue 21” search and rescue communications system may be necessary. In particular	Section 3.11.2 of the FEIS has been revised to include an expanded discussion of impacts on marine communication systems. Section 3.11 of the FEIS includes a discussion of the Final MARIPARS.

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	we need to understand the impact, if any, of WTGs on radio direction finding accuracy and digital signal degradation.	
0232-012	In the third bulleted paragraph under “Offshore Construction and Installation” [on page 3-206] it should be noted that the Coast Guard generally has no authority to “establish variable-size temporary safety zones” within the WDA. The authority to establish such safety zones (as was done for the Block Island Wind Farm, 3NM offshore from Block Island) extends only to the boundary of the U.S. territorial sea, 12NM from shore.	Section 3.11.2 of the FEIS has been revised to address the limits of the USCG authority. Concerning vessel access to the WDA, it is worth mentioning that temporary limited or restricted access areas (safety zones) may be set up around active construction areas where applicable. However, note that BOEM does not have the authority to restrict access to the WDA during operations. In addition, the USCG has stated that they do not intend to restrict access to the WDA during operations. The USCG’s authority to establish safety zones only extends to the boundary of the territorial waters of the United States, which is 12 nautical miles from shore and outside the WDA.
0232-013	[Page 3-028] it should be noted that any vessel, even those taller than 82 feet, would be free to transit within the WDA, but would need to exercise extra caution to avoid WTG blades (and the WTGs themselves).	Section 3.11.2 of the FEIS has been revised to further describe navigational risks for vessels within the WDA.
0232-014	Radar impacts are a function of numerous issues including turbine height and size, proximity to other towers, weather, atmospheric, shipboard radar quality, radar operator proficiency, target size and number, etc. Both the DEIS and NSRA mention projected radar impacts only briefly, though Vineyard Wind has committed in both documents to “work with stakeholders to identify potential mitigation measures, as necessary.” As we did for the Block Island wind farm, the Coast Guard may recommend to BOEM that it include a condition in any permit issued to Vineyard Wind that, before beginning construction or operation of the wind farm, Vineyard Wind shall submit to the Coast Guard and BOEM a researched analysis specific to the final Vineyard Wind design concerning whether or not the WTGs produce radar reflections, blind spots, shadow areas, or other effects that could adversely impact safety of navigation. This analysis must also provide the Coast Guard with recommended measures to mitigate the adverse impact to vessel radars, if any, resulting from the wind farm. If mitigation measures are deemed necessary for navigation safety by the Coast Guard, those mitigations will be funded by Vineyard Wind.	Section 3.4.7.3 of the DEIS included a discussion of impacts on radar and associated mitigation measures; therefore, no changes to the FEIS are warranted.
0232-015	We recommend expansion of the cumulative analysis area in Section 3.4.7.10 to include all of the area per Table C.1-2, and also include the applicable Tier 3 projects listed in Table C.1-4. It is our understanding that one of those Tier 3 projects intends to submit its COP to BOEM within the next month, and another has a PPA in place and a COP is being developed. These projects, to our understanding, clearly meet the “reasonably foreseeable” and “sufficiently likely to occur” standard to be considered in a cumulative impact analysis described in Section C.1.	The range of reasonably foreseeable offshore wind projects has been expanded since publication of the DEIS, and this change was evaluated in BOEM’s SEIS. The assessment methodology in the SEIS was carried forward and implemented in the FEIS.

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0232-016	The cumulative activities analysis in the DEIS does not speak to the cumulative impact to human factors. One of the Coast Guard’s paramount concerns is the ability o mariners to safely and routinely transit from one end of the MA/RI WEA to the other...on a relatively straight track-line at a relatively consistent speed. The intent is to minimize mariner time within the wind farm (for those wishing to transit through), facilitate mariner focus on navigation (by reducing vessel maneuvers) and overall to minimize operator fatigue. Absent a mandate that would require consistent symmetrical turbine alignment and spacing among the several different projects sufficient to facilitate safe navigation, designated navigation corridors through the MA/RI WEA may be necessary. The Coast Guard may conduct a study to determine the number, location, and width of such corridors to facilitate safe navigation through the entire MA/RI WEA based on an assumption that each of the current leaseholders will construct an industrial-scale offshore wind farm within their respective lease areas.	Sections 2.1.1.2 and 3.11 of the FEIS have been updated to discuss the 2-nautical-mile-wide northeast-southwest navigational safety corridor identified by the Massachusetts Fisheries Working Group on Offshore Wind, as well as the USCG’s Final MARIPARS.
0232-017	Page G-4: Under “United States Coast Guard (USCG) Lighting”, the exact number, characteristics, and color of lighting will be determined once a final layout plan is submitted by Vineyard Wind. Generally the aids to navigation lighting and marking guidance contained in the International Association of Lighthouse Authorities (IALA) publication O-129, Marking of Man-Made Offshore Structures, and applicable sections of the Coast Guard’s Aids to Navigation Manual, will apply. Upon the developer’s application, the Coast Guard will issue a Private Aids to Navigation (PATON) permit for each tower constructed.	Section 2.1.1.1 of the FEIS has been updated to indicate that the USCG would determine during their review the exact number, characteristics, and color of lighting for the WTGs.
0233-001	The Town of Nantucket supports the responsible development of cost-effective offshore wind as an opportunity to help the Commonwealth meet its Greenhouse Gas (GHG) emission reduction mandate, address the retirement of aging power plants, provide economic development opportunities for Massachusetts businesses, and job creation of Massachusetts residents.	Thank you for your comment.
0233-002	...we strongly urge for BOEM to formally require [ALDS]...In selecting nighttime lighting systems for the wind turbine generators [WTGs], 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. Strobing or blinking nighttime lighting systems, as are standardly installed on WTGs, are incongruous with Nantucket’s lighting regulations and will negatively impact the Island’s cultural identify of historic and environmental preservation.	Section 3.3.4 of the FEIS has been updated to address dark sky qualities as well as the possible implementation of ALDS. Appendix D has been updated to include ALDS as a potential mitigation measure that could be required by BOEM as a condition of COP approval.
0233-003	We disagree with the DEIS conclusion that the project’s visual effects on Nantucket would be “minor,” or adequately mitigated by paint color or ADLS lighting alone. The size and scale of the project within the viewshed of the	Section 3.8 of the FEIS has been updated to account for the Massachusetts Historical Commission’s concurrence on the findings of the onshore substation. The section has also been updated to include the latest information related to the

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	Island...will negatively affect Nantucket’s designation as a National Historic Landmark...To minimize the visual impacts of WTGs, the Town of Nantucket supports a reduction of the project’s development footprint (Alternative E), in part by removing or relocating the northern most row of turbines, closest to Nantucket’s shore (Alternative C)...The design modification of essentially “pushing back” the closest, most visible WTGs from Nantucket, would minimize the adverse visual impacts upon the Nantucket Historic District, without reducing the power output potential of the lease area. Because of the large size and height of the Project’s preferred 9.5MW MHI Vestas WTGs, the visual impact of the structures on the Nantucket viewshed is a significant environmental impact requiring careful assessment, minimization, and mitigation, above and beyond the limited scope of the Section 106 Review.	Section 106 consultation process. Descriptions of the Proposed Action and alternatives analyzed are described in Chapter 2 and evaluated in resource-specific sections in Chapter 3 and Appendix A. BOEM may select any combination of the alternatives evaluated, and may require additional mitigation measures as conditions of COP approval. BOEM will not make a decision on Vineyard Wind’s COP until the Section 106 process has concluded, which would allow BOEM to determine which are the available and most adequate mitigation measures if it was to decide to approve Vineyard Wind’s COP.
0233-004	The DEIS does not adequately address the impacts on Nantucket-specific tourism related to its historical significance, remote sense of place, natural preservation, or pristine setting of island beaches.	Section 3.9.1 of the FEIS discusses the characteristics of Nantucket and Martha’s Vineyard that contribute to recreation and tourism.
0233-005	Furthermore, the DEIS fails to evaluate the viewshed impact on the quality of life for the residents of Nantucket...Many local residents, such as those who live in Madaket, just 14.7 miles from the closest proposed WTGs, treasure the unobstructed ocean views, a resource that has remain unspoiled by industrial elements for thousands of years...BOEM must carefully consider the impacts on Nantucket’s unique character which we contend is a “resource” both to the island’s economy and under NEPA’s definition. These potential adverse effects must be further analyzed and quantified.	Section 3.4.4.3 of the DEIS addressed visual impact; the FEIS addresses visibility from residences and impact on residents from the proposed Project. In addition, Section 3.6.2 of the FEIS includes the material on impacts on residential property values.
0233-006	The [photosimulations contained on a separate document located on BOEM’s Vineyard Wind webpage are] in a format and quality impossible to accurately judge or interpret...Simulations provide a “best case” representation of the Project’s visual impact upon the Island’s southern horizon, a key contributing element of Nantucket’s nationally-significant maritime history.	<p>Section 3.9.2 of the FEIS has been updated for description of the photo-simulations and panoramic photomontages provided.</p> <p>As part of the COP submission, Vineyard Wind prepared visual simulations of what their proposed Project would look like from various locations. These simulations were prepared as part of the larger Visual Impact Assessment which is Appendix III-H.a of the COP (Epsilon 2020d). In addition, Vineyard Wind prepared a nighttime video simulation and (Summer, Fall) daytime video simulations to show what the proposed offshore wind facility would look like under various conditions. Section 800.4(b)(1) of the Section 106 regulations states that federal agency officials shall make a “reasonable and good faith effort” to identify historic properties. The visual simulations can be viewed at the following link: https://www.boem.gov/vineyard-wind/</p> <p>The video simulations can be found at: https://www.boem.gov/Night-Visual-Simulation-Video/ https://www.boem.gov/Day-Visual-Simulations-Videos/</p>

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0233-007	Photosimulations during sunset - a well-known tourist and resident asset - remain missing. The video simulations simply do not capture the extraordinary experience of a Madaket Sunset.	<p>The simulations provided as part of the COP provide an objective representation of the visual impact.</p> <p>As part of the COP submission, Vineyard Wind prepared visual simulations of what their proposed Project would look like from various locations. These simulations were prepared as part of the larger Visual Impact Assessment which is Appendix III-H.a of the COP (Epsilon 2020d). In addition, Vineyard Wind prepared a nighttime video simulation and (Summer, Fall) daytime video simulations to show what the proposed offshore wind facility would look like under various conditions. Section 800.4(b)(1) of the Section 106 regulations states that federal agency officials shall make a “reasonable and good faith effort” to identify historic properties. The visual simulations can be viewed at the following link: https://www.boem.gov/vineyard-wind/</p> <p>The video simulations can be found at: https://www.boem.gov/Night-Visual-Simulation-Video/ https://www.boem.gov/Day-Visual-Simulations-Videos/</p>
0233-008	Additional simulations representing each season, with strict adherence to best practice guidelines and methodology, as identified by BOEM’s Compendium Report for the New York Call Area, are necessary.	<p>The simulations provided as part of the COP provide an objective of the visual impact.</p> <p>As part of the COP submission, Vineyard Wind prepared visual simulations of what their proposed Project would look like from various locations. These simulations were prepared as part of the larger Visual Impact Assessment which is Appendix III-H.a of the COP (Epsilon 2020d). In addition, Vineyard Wind prepared a nighttime video simulation and (Summer, Fall) daytime video simulations to show what the proposed offshore wind facility would look like under various conditions. Section 800.4(b)(1) of the Section 106 regulations states that federal agency officials shall make a “reasonable and good faith effort” to identify historic properties. The visual simulations can be viewed at the following link: https://www.boem.gov/vineyard-wind/</p> <p>The video simulations can be found at: https://www.boem.gov/Night-Visual-Simulation-Video/ https://www.boem.gov/Day-Visual-Simulations-Videos/</p>
0233-009	We also seek updated visual simulations that reflect any change in final WTG placement or layout, such as the scenarios presented in Alternative D.	<p>The simulations provided as part of the COP provide an objective assessment of the visual impact.</p> <p>As part of the COP submission, Vineyard Wind prepared visual simulations of what their proposed Project would look like from various locations. These simulations were prepared as part of the larger Visual Impact Assessment which</p>

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		<p>is Appendix III-H.a of the COP (Epsilon 2020d). In addition, Vineyard Wind prepared a nighttime video simulation and (Summer, Fall) daytime video simulations to show what the proposed offshore wind facility would look like under various conditions. Section 800.4(b)(1) of the Section 106 regulations states that federal agency officials shall make a “reasonable and good faith effort” to identify historic properties. The visual simulations can be viewed at the following link: https://www.boem.gov/vineyard-wind/</p> <p>The video simulations can be found at: https://www.boem.gov/Night-Visual-Simulation-Video/ https://www.boem.gov/Day-Visual-Simulations-Videos/</p>
0233-010	One of the options included in the DEIS is an export cable route through Nantucket’s coastal water jurisdiction (“Eastern Muskeget” route). The final report should identify, demonstrate, and enumerate what specific mitigation measures and benefits would accrue to Nantucket if this option is exercised, especially if this option is determined to disrupt fisheries and local commercial fishing activities.	The Proposed Action included two options through Muskeget Channel, which was discussed in the DEIS. The file selection of the western or eastern route would be determined during final engineering siting by Vineyard Wind. The FEIS has assessed the impacts associated with both options. The revised Section 3.2.2 of the FEIS has been revised to discuss specific requirements for Nantucket waters.
0233-011	Nantucket has a robust fishing industry which is threatened by the overall project and in particular the export cable route through Nantucket’s coastal waters. The design of the wind farm conflicts with commercial fishing methods creating a safety hazard to both commercial fisherman and recreational boaters. Additionally...there is potential damage to commercial fisheries including those for squid, river herring, shad, sea herring, striped bass, lobster, Jonah crab, horseshoe crab, and conch, which have not been addressed in the DEIS.	Section 3.2.2 of the FEIS has been revised to include additional information about the export cable route through Nantucket’s coastal waters. Section 3.10.1 of the FEIS has been revised to provide additional information on Nantucket’s fishing activities. Section 3.11.2 of the FEIS has been revised to further discuss navigational impacts on fishing vessels within the WDA.
0233-012	This incremental vessel traffic [from planned maintenance], over 30 years, can have a material impact on Nantucket and its surrounding waters well beyond the 2-3-year proposed installation period. Vessel routes should be established in advance to minimize these impacts.	Section 3.11.2 of the FEIS has been revised to include additional information on vessel traffic from planned maintenance, as well as updates on Vineyard Wind’s self-implemented measures.
0233-013	These minimum standards [for US offshore wind projects] would include: - Clear guidelines for Visual Impact Assessment and Visual Simulations, such as: - Standards and methodology, as identified in the “Renewable Energy Viewshed Analysis and Visualization Simulation for the New York Outer Continental Shelf Call Area: Compendium Report; - Panoramic Photomontages, such as Trueview Simulations - Single Frame simulations per season and during specific times of local concern (i.e. sunset), from nondeceptive angles or perspectives (i.e. beach level. vs. bluff). The public should be able to easily compare the visual simulations from different developers “apples to apples” for projects within the same viewshed.	<p>BOEM is in the process of developing guidelines for visual impact assessments. We will note your recommendation for said purposes. In addition, Section 3.9.2 of the FEIS has added text describing in greater detail the visual simulations provided by the Vineyard Wind Visual Impact Assessment, including “panoramic photomontages” (“TrueView” is a copyrighted product of one specific vendor).</p> <p>As part of the COP submission, Vineyard Wind prepared visual simulations of what their proposed Project would look like from various locations. These simulations were prepared as part of the larger Visual Impact Assessment which is Appendix III-H.a of the COP (Epsilon 2020d). In addition, Vineyard Wind</p>

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	<p>- Use of 3D software that permits the viewer to create custom views, such as submitted in the 400-page visual simulation assessment within the DEIS for Deep Water Wind’s Block Island Wind Farm.</p>	<p>prepared a nighttime video simulation and (Summer, Fall) daytime video simulations to show what the proposed offshore wind facility would look like under various conditions. Section 800.4(b)(1) of the Section 106 regulations states that federal agency officials shall make a “reasonable and good faith effort” to identify historic properties. The visual simulations can be viewed at the following link: https://www.boem.gov/vineyard-wind/</p> <p>The video simulations can be found at: https://www.boem.gov/Night-Visual-Simulation-Video/ https://www.boem.gov/Day-Visual-Simulations-Videos/</p>
0233-014	<p>These minimum standards [for US offshore wind projects] would include: - Requiring the least impactful nighttime lighting, such as [ALDS], as part of the COP approval process.</p>	<p>Section 3.9.2 of the FEIS has been updated to address night sky and use of ADLS.</p>
0233-015	<p>These minimum standards [for US offshore wind projects] would include: - Requiring all windfarms in a specific region to use the same paint color, determined to be the most effective in minimizing the visual impacts, per specific atmospheric/geographical conditions on the lease sites.</p>	<p>Vineyard Wind would paint WTGs no lighter than RAL 9010 Pure White or no darker than RAL 7035 Light Grey to help reduce potential visibility against the horizon. The proposed paint colors would be in conformance with FAA standards.</p>
0233-016	<p>These minimum standards [for US offshore wind projects] would include: - Establishing minimum set-back standards from land, with specific considerations for historic landmarks and areas with tourism-driven economies... we propose that 17.65 miles, or half the 35.3-mile visual buffer (limit of WTG visibility) be considered as a more appropriate and reasonable initial benchmark for a minimum setback. The proposed 14.7 miles is too close a distance to a National Historic Landmark and sets a dangerous and irresponsible precedent for the industry.</p>	<p>The northwesternmost WTG is approximately 14.6 miles (23.5 kilometers) from the Nantucket shoreline (Tuckernuck Island) under Alternative C and approximately 14 miles (22.5 kilometers) from Nantucket shoreline (Tuckernuck Island) under the Proposed Action. The visual effects of the alternatives have been analyzed in detail in the Section 3.9 of the FEIS. Furthermore, under Alternative A, out of the 106 WTG placement locations, 82 of them are further than 17.65 miles (28.4 kilometers) away from the Nantucket shoreline, leaving 24 locations within 17.65 miles (28.4 kilometers).</p>
0233-017	<p>These minimum standards [for US offshore wind projects] would include: - For communities with historical significance, BOEM should help ensure that local stakeholders receive fair and direct access to any state and federal agencies or resources, which may provide critical regulatory guidance on how best to avoid, minimize, and mitigate the local impacts of offshore windfarms. This support would be provided independent of the Section 106 process, and would, for example, identify and encourage dialogue between communities with their [SHPO] and the [ACHP] connections the Town has been unsuccessful in establishing to date.</p>	<p>BOEM is in the process of developing guidelines and minimum standards. Mitigation measures that could be implemented as a condition of COP approval have been updated in Section 3.8 of the FEIS and are also included in Appendix D of the FEIS.</p> <p>Prior to preparation of a DEIS, BOEM held five public scoping meetings near the proposed Project area to solicit feedback and identify issues and potential alternatives for consideration. Additional public input opportunities occurred during the proposed Project’s planning and leasing phases between 2009 and 2015. BOEM also consulted with state, federal, and tribal agencies. BOEM considered all of the resulting comments while preparing this DEIS. Furthermore, BOEM published a DEIS on December 7, 2018, which initiated a 45-day comment period open to all. BOEM used the comments received to inform preparation of the FEIS. The public comment period for the DEIS for the</p>

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		Vineyard Wind Project was extended until February 22, 2019 due to the government shutdown. Furthermore, BOEM rescheduled the five public meetings and they were held on February 11, 12, 13, 14 and 15, 2019. Appendix C (formerly Chapter 4) of the FEIS was updated with this information including information related to the virtual public meetings held during the SEIS public comment period.
0234-001	Collectively, these new circumstances [including an agreement between the applicant and environmental groups regarding impacts on marine resources; discussions underway between the developer and the fishing industry; receipt of a Supplemental Navigation Risk Assessment] must be considered and evaluated to determine whether they warrant evaluation in a Supplemental DEIS and how that may impact the overall schedule for environmental review and issuance of necessary permits and authorizations. If the decision is to address these circumstances in the FEIS, the rationale and basis for this decision should be documented for the record.	Appendix D of the FEIS includes a list of proposed mitigation measures that will be considered by the decision maker during the Record of Decision. BOEM has evaluated the need to prepare a supplemental EIS and determined that the additional commitments by Vineyard Wind such as the agreement with the National Wildlife Federation, the Natural Resources Defense Council, and the Conservation Law Foundation, Supplemental NRA, or the establishment of the Trust does not constitute “substantial changes in the proposed action that are relevant to environmental concerns” or “significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts” (40 CFR 1502.9 (c)(1)). Therefore, BOEM has concluded that supplementation of the DEIS is not required under CEQ regulations. BOEM analyzed the Agreement, Supplemental NRA, and Trust in the FEIS.
0234-002	Many of the conclusory statements relating to the scale of impacts for biological resources are not well supported in the document. Given the size and scope of the proposed project, it appears that impacts categorized as major are under-inclusive, while impacts designated as moderate are overly inclusive. It is important to clearly identify whether impacts are considered beneficial or negative, the duration of impacts, and the intensity of impacts with substantive supporting documentation.	The FEIS has been updated to include the anticipated duration of the impact as well as justification for the impact rating.
0234-003	The cumulative impacts analysis remains too narrow. Specifically related to other offshore wind leases, the analysis focuses on the Tier 1 and Tier 2 projects which is limited in scope given the fact that there are several more lease areas within projects planned and anticipated dates for receipt of Construction and Operation Plans. We are particularly concerned with the lack of cumulative analysis related to biological and economic impacts.	BOEM has revised the list of reasonably foreseeable future offshore wind projects based on project progress since publication of the DEIS, and this information was included in the SEIS and carried forward to the FEIS. The list of reasonably foreseeable future offshore wind projects is included in Appendix A of the FEIS. Potential impacts are considered as described in Appendix A and in individual resource sections within Chapter 3 and Appendix A.
0234-004	Both the cumulative analysis and the analysis under Chapter 3 do not sufficiently address potential short and long-term economic impacts to the fishing industry. Additional economic data are needed to adequately characterize all fisheries that operate in the proposed project areas, including the number and type of vessels that may be impacted, their reliance upon this area for fishing revenue, and the scale of potential impact to these and other vessels directly or indirectly affected by displacement of effort.	BOEM has revised the list of reasonably foreseeable future offshore wind projects based on project progress since publication of the DEIS, and this information was included in the SEIS and carried forward to the FEIS. The list of reasonably foreseeable future offshore wind projects is included in Appendix A of the FEIS. In addition, data are presented and analyzed for the average revenue exposed to offshore wind energy development.

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0234-005	The analysis of pile driving impacts to fish is largely limited to establishing the size of the area where mortality, injury, and behavioral disturbance would be experienced with minimal analysis of the expected consequences of that noise (i.e., there do not appear to be any assessments of the number of species of fish likely to be killed or injured or the consequences to individuals or populations from behavioral disturbance). ...for sea turtles, there is no analysis of the effects of behavioral disturbance due to exposure to pile driving noise. Likewise, the analysis of pile driving impacts to marine mammals relies on preliminary take estimates provided by Vineyard Win and need a more robust analysis to support conclusions regarding impacts.	Section 3.3.2 of the FEIS has been updated on the discussion of potential impacts of pile driving noise on fish, including sublethal impacts. Further discussion of sea turtle occurrence and acoustic impacts are provided in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ . Section 3.4.2 of the FEIS has revised the discussion of acoustic impacts on marine mammals. Further details regarding acoustic effects to these species are provided in Appendix F of the FEIS and in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents . In addition, Vineyard Wind has applied to NOAA for an Incidental Harassment Authorization and has included revised estimates of the number of marine mammals that would be affected; the application and the draft Authorization can be found at the following link: https://www.fisheries.noaa.gov/action/incidental-take-authorization-vineyard-wind-llc-construction-vineyard-wind-offshore-wind
0235-001	As a resident of New England, I believe that it is essential to create a renewable energy project that will provide a clean unlimited source of energy to help New England to be less oil and fossil fuel dependent The proposed project will meet the need for a safe, clean, and renewable energy source with minimal environmental damage. If this project is followed through with, there will be no worry about how to meet the necessary demands for oil and other fossil fuels.	Thank you for your comment.
0235-002	The damage caused to the environment by the proposed project is far outweighed by its benefits.	Thank you for your comment.
0235-003	As a result of its location, the wind turbines offshore farm is subject to damage from natural disasters like hurricanes. It is essential that the design accounts for the ability to survive the strong ocean winds and waves of these disasters.	Section 2.3 and Appendix E of the FEIS discuss severe weather and natural events.
0235-004	This project and the decision that is made about it will set a precedent for future renewable energy projects in America and has serious consequences.	Thank you for your comment.
0236-001	There needs to be a comprehensive study to any/all effects that will occur to the “Habitat Management Area” that is located directly East of the proposed wind farm. After many years and scientific studies, this (HMA) has been identified by National Marine Fisheries Service as a critical habitat area for spawning and juvenile Atlantic Cod stocks.	Appendix D of the FEIS has updated the list of monitoring and mitigation that has been proposed for the agency-preferred alternative. Further discussion of juvenile Atlantic cod HAPC is provided in the EFH Assessment, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/
0236-002	I would not like to see a trade off of one natural renewable resource (seafood) for the benefit of another I believe that BOEM and the wind developers need to take a step back and identify areas that will work for both users.	Thank you for your comment.
0237-001	The DEIS is incomplete & lacks any clear measurable provisions to address lost, damaged gear or fishing opportunity. The New England fishing fleets annual migration to those squid, fluke + conch grounds (ie cable lying area) comes with	Section 3.6.1 of the FEIS has been updated to include information for ocean economy employment data and Section 3.6.2 of the FEIS for employment in ocean economy sectors including commercial fishing. Mitigation measures and

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	fixed steep costs (ie tieup fees, annual unloading & fuel fees, parking fees etc)[.] We cannot absorb these when there is lost fishing time due to imposed restriction when cable lying. We are restricted by tides, moons, weather, time of day/night[.] Due to regulations, we cannot afford construction closures & delays & lost income[.] [There] needs to be exact, clear, measurable, policy, protocol & \$\$\$ in place that have been agreed upon in open, transparent meetings [with] fishermen stakeholders.	compensation programs to be put in place by Vineyard Wind are outlined in revisions to Appendix D and Section 3.10.2 of the FEIS. Some portions of the WDA will be limited to fishing during construction and installation, but fishing in the WDA will continue during operations of the project.
0237-002	The DEIS is incomplete & inaccurate. There are no time tables for mitigation or preconstruction baseline monitoring of the effects on habitat, fish & wildlife & fishermen. The American public may well be in line to lose access to fresh, local, wild & natural seafood as there are no safeguards in place to help sustain the local inshore dayboat fleet or any other seafood purver, private citizen & nurse & crew[.]	Appendix D of the FEIS has updated the comprehensive list of all monitoring and mitigation measures proposed for the agency-preferred alternative.
0237-003	The DEIS is incomplete, inconcise & vague at best. The proposed cable route lies smack in the middle of squid and fluke fishing tows. There will be repercussions to these fishing grounds. It is known to be a very dynamic, complex & ever changing seabed. There needs to be a concise premonitoring plan of at least 3-5 season[s] & a predetermined mitigation plan in place prior to any onset of even the least invasive beginnings of construction.	Sections 3.3 and 3.10 of the FEIS include updated discussions of impacts on finfish and commercial fisheries, respectively. Further discussion of impacts on commercial fisheries is provided in the Essential Fish Habitat Assessment, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/
0237-004	The DEIS is incomplete & inadequate... There needs to be at least 3-5 years of preconstruction monitoring to get at very best a rough baseline and then there would need to be constant monitoring during construction & operation and years post decommissioning. Since this is the proposed 1st turbine array in this very area there is absolutely no way to predict its effects. We have witnessed whales, dolphins, sturgeon, rays, Flounders, crab, mantis shrimp, squid, sharks, leatherback turtles etc. in this area. It is a very important area for fluke, squid, conch, horseshoe crab, seabass, tautog fishery & there needs to be a \$ amount of mitigation predetermined before the start of construction & where will the quota come from???	Sections 3.2.2, 3.3.3, 3.4.2, 3.5.2, and 3.10.2 of the FEIS have been revised to include an updated discussion of anticipated impacts on benthic species, finfish, marine mammals, sea turtles, and commercial fisheries, respectively. Appendix D has been revised to include an updated list of monitoring and mitigation measures proposed for the agency-preferred alternative.
0237-005	The DEIS is incomplete & over simplified & under estimates the damage that is looming to the NE fishing fleet. Unless there is more time [spent] at premonitoring the cable lying area & there are solid plans in place to address fishing gear & fishing time lost thru open transparent negotiations for \$ mitigation we are standing to lose what remains of the mass dayboat inshore fishing fleet and the fresh local seafood it harvests[.]	Section 3.6.1 of the FEIS has been updated to include information for ocean economy employment data and Section 3.6.2 of the FEIS for employment in ocean economy sectors including commercial fishing. Section 3.10 of the FEIS has been revised to include new data and additional analysis. Mitigation measures are provided in Appendix D of the FEIS.
0237-006	The DEIS is vague & incomplete. The cable has potential to present great risk to the fishing fleet. There needs to be a clearly stated, measurable plan & goals of premonitoring and there needs to be open, transparent & measurable terms of mitigation for the fishing fleet. In the absence of either one of these [family]	Section 2.2.1, Section 3.3.6.3, and Appendix D of the DEIS included a discussion of monitoring and mitigation proposed for the Project. Section 3.3.2 of the FEIS has provided additional language for monitoring. Additional monitoring requirements and mitigation measures, if any, will be developed in coordination

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	operated fishing & shoreside businesses will cease to exist and the public will lose fresh, local seafood & culture.	with the NMFS and included in the Record of Decision. Vineyard Wind is preparing a separate cable burial risk assessment. Section 3.6.1 of the FEIS has been updated to include information for ocean economy employment data and Sections 3.6.1 and 3.6.2 of the FEIS has been revised to add community identify related to fishing industry.
0237-007	DEIS analysis is totally inaccurate & incomplete, it fails to give any specific timeframe for premonitoring, or any specific amounts or terms of mitigation for the fishing fleet, the fish or the businesses affected. This is one huge experiment by a foreign entity, hailed by some so called environmental groups that have already cashed in at the expense of an ecosystem that the commercial & Rec. & charter fleet has painstakingly build up & preserved. There needs to be years of preconstruction monitoring & [immediate] financial mitigation terms in place.	Section 3.10 of the FEIS has been revised to include new data and additional analysis. Appendix D of the FEIS has been revised to provide an updated list of monitoring and mitigation measures.
0237-008	The DEIS is incomplete & inadequate. It fails to outline clear, concise measurable premonitoring timelines & outcomes. It does not offer any exact amounts, measures or goals of mitigation to address the looming impacts to our [cherished] commercial fishing fleet.	Section 3.10 of the FEIS has been revised to include new data and additional analysis. Appendix D of the FEIS has been revised to provide an updated list of monitoring and mitigation measures.
0237-009	I cannot for the life of me understand why... [commercial fisheries] are required to operate under this strict quota system that accounts for every discard - dead or alive, weights and measures stones & empty shells [-] but proposes to let this foreign entity to operate card blanche! Without assigned quota!	Thank you for your comment.
0238-001	The Vineyard project's [environmental] impact must be considered in the context of all possible sites and not in a vacuum.	BOEM has revised the list of reasonably foreseeable future offshore wind projects based on project progress since publication of the DEIS, and this information was included in the SEIS and carried forward to the FEIS. The list of reasonably foreseeable future offshore wind projects is included in Appendix A of the FEIS. Additionally, Chapter 1 and Appendix A of SEIS included the methodology for assessing potential effects and include a listing of the other offshore wind projects that are evaluated in the resource-specific sections in SEIS.
0238-002	The Vineyard project's impact must be lumped with the [environmental] impact of the transmission cable - and not reviewed seperately.	As described in Section 2.1.1 of the DEIS, the Project would tie in to existing electric power transmission infrastructure. No changes to the FEIS are warranted.
0238-003	It must be made clear how any future [environmental] damage would be covered by multiple projects owned by multiple owners in the ocean.	Each resource section in Chapter 3 and Appendix A in both the DEIS and FEIS, (and Section A.8 in Appendix A of the FEIS, addresses potential environmental impacts of reasonably foreseeable future projects identified in Appendix A. No changes to the document were made in response to this comment.
0239-001	During public testimony in Hyannis, MA on February 13, 2019 one of our staff emphasized that the Draft Environmental Impact Statement (DEIS) released by the Bureau of Ocean Energy Management (BOEM) was flawed due to numerous errors in the section addressing fisheries activity in the area in question. These errors and misrepresentations tend to diminish the potential impact of the	Sections 3.10.1 and 3.10.2 of the FEIS have been revised to include additional data provided by NMFS to characterized fisheries in the WDA.

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	Vineyard Windfarm on commercial fishermen and/or diminish the general importance of that area for present activity. In my humble opinion these errors must be corrected prior to the issuance of a FEIS. Moreover, I feel that the entire document needs to be the subject of a careful review to correct and remove similar inaccuracies.	
0239-002	United States Coast Guard personnel and BOEM officials have repeatedly made statements that access and traffic within the “footprint” of the windfarm will not, under any circumstances, Include buffer zones around the platforms and poles supporting the turbines. I bring this up because of its importance to commercial fishermen and general navigation. It is extremely important that the FEIS language specifically includes and emphasizes this point.	Section 3.11.2 of the FEIS has been revised to include additional information on vessel access around the platforms in the WDA. BOEM does not have the authority to restrict access to or within the WDA.
0239-003	I would also like to go on record as stating that damage and mitigation funds must be set aside in the event that this project results in harm to the commercial fishing activity that takes place in these areas. This could be due to unforeseen problems caused by the construction of the windfarm and installation of the equipment along with issues arising from ongoing operation. It has been reported that an actuarial analysis is being considered to predict potential damages to the fisheries. Such an insurance-based model may prove to be extremely prudent and I do encourage that this work move forward.	Section 3.10.2 and Appendix D of the FEIS have been revised to provide an updated list of monitoring and mitigation measures.
0239-004	I realize that the Vineyard Wind Project is only one of several wind development projects under consideration off the coast. The region has the potential to become the world’s largest offshore wind development. It is of great importance that the federal government recognize that at some point we could have hundreds of square miles of ocean hosting separately owned and managed wind turbine grids which would have the appearance of being a single massive entity. For this reason, I feel it is imperative that the federal government does everything in its power to avoid managing these projects on a piecemeal basis. The developers of these projects must adhere to consistent regulations and each additional project must be looked upon as a part of a massive network, not as an individual project.	BOEM has revised the list of reasonably foreseeable future offshore wind projects based on project progress since publication of the DEIS, and this information was included in the SEIS and carried forward to the FEIS. The list of reasonably foreseeable future offshore wind projects is included in Appendix A of the FEIS. Additionally, Chapter 1 and Appendix A of SEIS included the methodology for assessing potential effects and include a listing of the other offshore wind projects that are evaluated in the resource-specific sections in SEIS.
0241-001	I am writing in support of the Vineyard Wind Offshore Project for many reasons[:] by producing energy with minimal carbon emissions it will contribute to reduction of climate change[:]; it will reduce nitrogen loading thereby protecting our coastal marine resources[and;]... it will increase public awareness of climate change & nitrogen loading[.]	Thank you for your comment.
0241-002	I am writing in support of the Vineyard Wind Offshore Project [because:]... it will create skills & jobs through the education efforts[.]	Thank you for your comment.
0241-003	I am writing in support of the Vi+D819neyard Wind Offshore Project [because:] any disruption is temporary & minimal compared to the dangers of climate change[.]	Thank you for your comment.

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0243-001	I am concerned... that in a “rush” to meet tax credit deadlines, all studies, reviews, mitigations and promises be completed and in writing prior to your issuance of any final approvals. It was interesting to hear that although supposedly there had been all types of meetings with environmental groups for several years, an agreement with the National Wildlife Federation was only reached 2 weeks prior to your New Bedford hearing. In testimony by others there appears to be similar concerns that “promises” be kept. Given that this project is a “first” and basically an experiment, it is crucial that all known, and anticipated consequences, are fully addressed now with written and bonded commitments.	Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. Additional mitigation and monitoring measures may arise from consultations and coordination with Federal and State resource agencies. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0243-002	Review of existing wind projects around the world has identified environmental issues with ocean-based wind farms. The Block Island project is a local example as fishermen and shell fishermen previously testified to the disturbance to their operations and mortality of the marine stock when the turbines were installed and cables laid. We also saw the failure of cable burial and the floating of cables in both fishing and swimming areas last year. Long Island Sound fishermen are claiming a destruction of certain fisheries because of the alteration of their migratory patterns. A 2017 study claimed that noise pollution from off-shore wind farms may cause the beaching of humpback whales. Although Vineyard Wind has cut the number of turbines to 84 (very large) turbines, there appears to be a need for further consensus and agreements reached with the fishing industry on the final layout of the installation. Protecting both habitat and migratory routes should be the priority, especially as depletion of certain species is already being documented in this region.	Vineyard Wind’s May 7, 2019, COP Addendum Part 1.2.2 (Epsilon 2019) states that the cable burial technologies planned would be more effective than the technologies used in Block Island Wind Farm. The Addendum also includes a cable burial risk assessment (COP Addendum Appendix A) that indicates that cable burial would likely be highly successful along the majority of the OECC; any places where the target burial depth is not achieved would either be buried deeper using additional passes of the burial tool or would be protected (e.g., with rocks, concrete mattresses, or half-shell ducts). BOEM has been unable to find a 2017 study (or any other applicable study) regarding humpback whales affected by offshore wind farm noise; there is currently no evidence that construction or operation of offshore wind farms causes marine mammal strandings. Appendix D of the FEIS has updated the comprehensive list of monitoring and mitigation that has been proposed for the agency-preferred alternative, including long-term monitoring of cable placement, as well as long-term monitoring of regional fisheries and compensation for lost income. These measures could become conditions of COP approval, to the extent allowed by law.
0243-003	Recent studies on land-based turbines have highlighted impacts on avian species in the West Coast of this country-where there have been significant numbers of birds (ranging from bald eagles, hawks, owls, bats and song birds) dying from encounters with blades. I am concerned about whether adequate and appropriate study of the avian population and migration patterns has been done and findings incorporated into the final location of the turbines.	Section A.8.3.2 in Appendix A of the FEIS updated the discussion of species that may be sensitive to collision or displacement effects. Also, Figure A.8.3-2 and Figure A.8.3-3 of the FEIS depict modeled use of the offshore portion of the proposed Project area by bird species with high collision sensitivity and high displacement sensitivity, respectively. Additionally, COP Volume III Sections 6.1 and 6.2 analyze potential exposure of birds to hazards associated with the proposed Project.
0243-004	[G]iven the size and location of this wind farm and the other potential leases I am concerned that the FAA and Coast Guard have completed all of their reviews and that serious consideration of these is reflected in your final decision. The area of Martha’s Vineyard/Nantucket/Cape Cod has significant air traffic to civilian and military airports, along with major commercial and recreational boating and marinas. Given there are now established “No Go zones” in Europe, we should be very concerned about protecting access to a region dependent on a tourist economy.	Sections 3.12.1 and 3.12.2 of the FEIS have been updated with additional detail about the status of the FAA process, as well as a reference to the Marine Coordinator Position. Furthermore, Section 3.11.2 of the FEIS has been updated to include coordination with USCG for considering additional recommendations regarding navigational safety.

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0243-005	As we await the final EFSB hearing findings and issuance of the report, I will reiterate the position that thousands of Yarmouth residents and Town officials have expressed - that we do not want the cables landing at New Hampshire Avenue in Lewis Bay. We have thought that Covell's Beach is possible, although we believed that landing at Brayton Point was the best location for the project. We believe that the environment needs help, and we are not opposed to wind power- just the potential damage to an environmentally fragile bay/estuary that we are trying to protect and rehabilitate.	As specified in Section 2.1 of the FEIS, the DEIS and SEIS contemplated two Onshore Export Cable Routes (OECRs), with alternative options within each route; however, since the publication of those documents, Vineyard Wind has stated all necessary state and local permits for the Covell's Beach landfall location have been acquired. Therefore, the Proposed Action (Alternative A) and action alternatives only contemplate the one landfall location, Covell's Beach landfall and onshore route. Alternative B therefore is no longer evaluated as an action alternative in this FEIS. In addition, Section 2.5 of the FEIS has been included to identify the agency-preferred alternative.
0243-006	I appreciate and respect the work that you are doing for the off-shore/ocean setting- but am concerned and request that all possible environmental protections are documented, required and committed to before your final approval is given to Vineyard Wind.	Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. Additional mitigation and monitoring measures may arise from consultations and coordination with Federal and State resource agencies. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0244-001	What maintenance is required ongoing for the turbines? Cost? Difficulty of accessing?	Section 2.1.1.2 of the FEIS includes a discussion of the operations and maintenance for the proposed Project.
0244-002	What happens in a 100 yr. storm, what sort of severe weather can... [the turbines] withstand?	Section 2.3 and Appendix E of the FEIS discusses severe weather and natural events.
0244-003	What lubricants/solvents/chemicals will be used [during construction and maintenance of the turbines]?	Section 2.1.1.2 of the FEIS includes a discussion of lubricants/solvents/chemicals that would be used for the proposed Project.
0245-001	I am commenting on the referenced EIS with serious concern regarding the analysis of alternatives for installing offshore wind turbines. In summary, the EIS states that the turbines will be installed on monopole or jacket foundations. No mention is made of the alternative of mobile jack-up platforms for offshore wind turbines. This is a far superior and well-known solution. It should have been included in the analysis of alternatives because it has significantly less environmental impact than the proposed foundation technology.	As stated in your comment letter, the proposed foundation type is not commercially available to be used and therefore is not an alternative that can be considered.
0246-001	I humbly request that the permitting process for the proposed Vineyard Wind project be thorough in all aspects. The shoal waters location is rich in nutrient and the associated food chain. In particular Long Tail duck and the Blue Whale or many many other species, will be adversely affected by construction & operation.	Thank you for your comment.
0246-002	A project of this magnitude, subsidized by the American taxpayer, should be subject to a most rigorous study of all environments & commercial affects.	Appendix D of the FEIS has updated the comprehensive list of the monitoring and mitigation that has been proposed for the agency-preferred alternative.
0248-001	In some cases, the identified scale of impacts does not appear to meet the definition of impact levels outlined in Chapter 3 of the DEIS. To help address this concern, the document should clearly identify whether impacts are considered beneficial or negative, the anticipated duration of the impacts, and the intensity of impacts. This information should also include substantive documentation that supports the conclusions made regarding the anticipated scale of impacts.	The FEIS has been updated where appropriate to ensure that the identified scale of impacts match the definition of impact levels outlined in Tables 3-1 and 3-2 in Appendix B. Where relevant, the FEIS has also been updated to clearly identify whether impacts are considered beneficial or negative, the anticipated duration of the impacts, and the intensity of impacts.

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0248-002	Further, the DEIS reduces the scale of impacts with the incorporation of mitigation measures. The mitigation measures, however, are not identified nor analyzed in the document.	Appendix D and the resource-specific sections of Chapter 3 and Appendix A of the FEIS have been revised to include an updated list of proposed mitigation and monitoring measures, for all action alternatives and the agency-preferred alternative.
0248-003	The analysis is solely dependent upon an undefined financial mitigation package, while impacts to the fishing communities go beyond just revenue loss. It is not clear how a simple financial package could reduce a major impact to minor.	Section 3.10 and Appendix D of the FEIS have been revised to include the Vineyard Wind’s voluntary established gear loss and revenue compensation funds for fishing interests based in Rhode Island, Massachusetts, and other states. Please see Section 3.10 and Appendix D of the FEIS for more details on the measures.
0248-004	Furthermore, the document should not assume that mitigation is an automatic positive across all resources. Specifically, mitigation to one part of the fishery may exacerbate impacts in another, or act in synergy with or antagonism to impacts to marine trust resources, such as whales, fish, and communities. Although the interconnectedness of the resources adds a certain amount of imprecision to the analysis, a qualitative analysis is possible. Even a qualitative analysis needs some specificity on the nature of the mitigation itself. Accordingly, if the document is going to conclude that mitigation will minimize the scale of impacts, that proposed mitigation should be clearly described and analyzed to support any change in the anticipated scale of impacts.	See response to comment 0248-003. To the extent commercial fisherman may be economically impacted as a result of the proposed Project, revenue compensation would help reduce such impacts; therefore, compensation would reduce economic impacts when compared to no monetary compensation. In addition, the potential displacement of fishing vessels and associated impacts has been updated in Section 3.10 of the FEIS. Finally, Appendix D of the FEIS has been updated to include modifications and/or additional mitigation and monitoring measures. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0248-005	...new information relevant to our authorities has recently come to light. Much of the new information is directly associated with mitigation measures related to marine mammals and fishing activities; however, these measures are neither identified in the DEIS nor analyzed. Understanding how the mitigation measures affect the impacts of the project continues to be one of our more significant issues with the document. Absent this information, it is difficult to understand how the scale of impacts is reduced.	BOEM does not consider the execution of the Agreement, the Supplemental NRA, or the establishment of the Trust to constitute “substantial changes in the proposed action that are relevant to environmental concerns” or “significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts” (40 CFR 1502.9 (c)(1)). Therefore, BOEM has concluded that supplementation of the DEIS is not required under CEQ regulations. Nonetheless, The Agreement, Supplemental NRA, and Trust have been incorporated into the FEIS and the potential effects are discussed throughout Chapter 3 and Appendix A. In general, most of the mitigation measures in the Agreement are identical to those contemplated in the FEIS. The Trust could improve navigation safety and fishing around the WTGs.
0248-006	In addition to mitigation, there are some potential impacts to biological resources that do not appear to be fully evaluated or analyzed in the document. For example, there is limited discussion and no full analysis related to potential impacts to pelagic habitat or alteration of habitat from project operation. Discussion related to impacts on larval transport is limited to one sentence in the document; however, pelagic habitat and potential impacts to that habitat is an important component of the project area that warrants full analysis.	Section 3.3.2 of the FEIS has been updated to include further discussion of the pelagic zone changes and habitat alteration in greater detail.

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0248-007	...there is limited analysis on impacts to Habitat Areas of Particular Concern (HAPC) for juvenile Atlantic cod, which is expected to be impacted by the project, as the cable route runs directly through this sensitive habitat. It is important to ensure all potential impacts of the project are evaluated in the document to adequately support conclusions related to the scale of impact.	Sections 3.3.1 and 3.3.2 of the FEIS has updated the discussion on the extent of juvenile cod HAPC and the degree of impact.
0248-008	We also have concerns related to the analysis of Alternative D2, which addresses an alternative spacing and orientation of the turbine layout. Data provided by the fishing industry as well as Automatic Identification System (AIS) and vessel monitoring system (VMS) data show clear patterns of east-west orientation of fishing activity throughout much of the lease area. However, it is not clear in the document that this information was considered and analyzed.	Section 3.11.1 of the FEIS includes additional information from analyzing the AIS, VMS, and submitted chart plotter images provided to the agencies. From this information, it is apparent that a general pattern of east-west or northeast-southwest (following Loran line orientation) fishing activity occurs in the WDA. This information is utilized in the effects assessment.
0248-009	We understand that other developers with adjacent projects are proposing expanded distances among turbines and an east-west orientation at the request of the fishing industry; however, this does not appear to be addressed in the socioeconomic or cumulative analysis. While Alternative D2 would not fully eliminate impacts to fishing operations, available information suggests impacts would be minimized for some fishing vessels, allowing them to continue to fish the area and thus reducing the negative economic impacts they incur. Despite the available information, the analysis comparing the alternatives suggests the net benefits of the different alternatives are limited and the scale of impacts for Alternative D2 is considered the same as the proposed action. This conclusion does not appear to be supported by the limited analysis.	Further discussion is included in the FEIS to evaluate the effects of re-orientation under Alternative D2 using the additional information provided on vessels movements (including both east-west and northeast-southeast patterns). This additional information is utilized to supports the conclusions of the effects assessment.
0248-010	As noted in the attachment [Attachment B], some of the most prominent fisheries that operate in the lease area do not appear to be fully characterized in the DEIS. For example, based on our analysis, the squid fishery landings in 2016 appear to be underrepresented, the Jonah crab and American lobster fisheries are not sufficiently characterized, and the analysis of fixed gear and recreational trips is outdated. An analysis that relies solely upon AIS or even our own VMS data often under-represents affected fishing activities, as not all vessels or fisheries are required to use these systems. We recommend the FEIS include the most recent information available to accurately characterize all fisheries affected by the proposed action.	Data presented in the description of the affected environment (Section 3.10.1 of the FEIS) has been revised throughout to include the most current data available. This includes presentation of both VMS and VTR data to show how different data collection methods provide a range of results.
0248-011	As part of this analysis, the document should evaluate potential changes in catch and catch rates across the different alternatives and in areas where fishing effort could be displaced as a result of the project. The potential for certain fisheries to be able to relocate should be also be considered.	The assessment of effects on commercial fisheries associated with each alternative in the revised Section 3.10 of the FEIS considers the potential effects on catch due to impacts on the availability of fish, as well as effects due to the displacement of vessels. The potential effects of disruption of fishing are discussed for construction and installation, and operations and maintenance for the Proposed Actions, and key differences in the predicted impacts for each

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		alternative described. Additional discussion has been provided on the potential for fishing vessels to relocate and the associated difficulties that may be faced.
0248-012	The economic data specific to the fisheries that operate in the project area appears to be limited. To fully evaluate fisheries operations in the area, we recommend evaluating additional information including the number and type of vessels that may be impacted, their reliance upon this area for fishing revenue, and the scale of potential impact to these and other vessels directly or indirectly affected by the displacement of effort.	Data presented in the description of the affected environment (Section 3.10.1 of the FEIS) has been revised throughout to include the most current data available, presented by port. This includes available catch and revenue information.
0248-013	In addition, we did not find a comprehensive cost-benefit analysis of the proposed action in the DEIS. While impacts to affected components of the natural and human environment are discussed, an overall evaluation of whether the potential cumulative benefits outweigh the potential cumulative costs is important to include in the analysis.	This EIS provides an evaluation of both beneficial and adverse effects of the Proposed Action and the alternatives to the Proposed Action. BOEM is confident that the socioeconomic information included in the FEIS is adequate to support the evaluation of the merits and drawbacks of each alternative with respect to the potential impacts the project could have on commercial and recreational fishing within the WDA. Also, because qualitative considerations may not be adequately captured using a monetary cost-benefit analysis, BOEM does not believe that a monetary cost-benefit analysis would best allow us to assess important qualitative considerations relevant to the choice among alternatives.
0248-014	In addition to impacts associated with revenue, potential social and cultural consequences of the project, such as time away from home, economic uncertainty, cultural affiliation, identity, and safety are important components of an assessment of impacts to fishing communities. These types of impacts are not adequately considered in the document.	<p>Section 3.6.1 of the FEIS has been updated to include a discussion of social and economic consequences of the project. Specifically, a discussion has been added to this section of the FEIS, including examples, specifying that local fishing fleets form an important part of the identity and tourist attraction of local communities. The section also discusses potential impacts related to established cultural identities and place attachments that are strongly correlated with the fishing economy.</p> <p>Section 3.11 of the FEIS has also been updated with additional information related to navigational safety, and Appendix D of the FEIS has been updated with new mitigation measures that may be required to further support navigational safety.</p>
0248-015	In addition, safety issues, including elevated risk of collision and injury/mortality of vessel operators and crew, are not discussed in any detail in the DEIS. Information that addresses the potential for accidents, deaths, and injuries for commercial fishing due to adaptation to restrictions imposed by construction and operation of wind farms is important to include in the analysis.	Section 3.11 of the FEIS has been updated to account for the potential risk for and consequences of collisions.
0248-016	...there is limited analysis of areas of mortality, injury, and behavioral impacts, particularly spawning activity for relevant species and potential loss in catch resulting from pile driving activities. Regarding the analysis of pile driving impacts to marine mammals, instead of relying heavily on numbers provided by the applicant in the COP (i.e., take numbers, percentages of stocks taken, and	This document does not specify likely effects on individual fish stocks, because an assessment of species-specific or stock-specific effects is outside of the scope of this document. The revised FEIS instead provides general descriptions of potential impacts on finfish, invertebrates, and EFH. Section 3.4 of the FEIS has been rearranged in consultation with NOAA to aid in responding to this

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	sizes of harassment zones), which are still preliminary at this time, we recommend including a summary of the impacts of pile driving noise on marine mammals based on available literature to reach conclusions on relative impact levels.	comment. Section 3.4.2 of the FEIS has been revised to include a review of relevant literature regarding the impacts of pile driving noise on marine mammals, as requested by the comment.
0248-017	The cumulative impacts analysis is too narrow. Specifically, related to other offshore wind leases, the analysis focuses on the Tier 1 and Tier 2 projects which is limited in scope given the fact that there are several more lease areas with projects planned and anticipated dates for receipt of COPs. Further, on December 14, 2018, BOEM concluded expansive lease sales for offshore energy valued at a total of \$405 million, located immediately adjacent to the Vineyard Wind proposed project area. The areas included in the December 2018 lease sale should be considered in the cumulative impact analysis, even if the project specific parameters are not fully understood.	BOEM prepared a SEIS that included an expanded planned action analysis, which described the methodology in Chapter 1 and the list of projects considered in Appendix A of the SEIS. Potential impacts are considered as described in Appendix A and in individual resource sections. BOEM has revised the list of reasonably foreseeable future offshore wind projects based on project progress since publication of the DEIS. Additionally, Appendix A has been updated to outline the planned action assessment methodology utilized in the development of the document. The appendix also outlines the other potential offshore wind energy projects that are considered reasonably foreseeable. The assessment of impacts is included in each resource-specific section in Chapter 3 and Appendix A.
0248-018	For example, it is not clear that there has been a consideration of how any anticipated displacement of fishing or vessel activity from the project area may result in a change in risk of interactions between those activities and protected species and other fishery resources outside the project area. It is important for the analysis of cumulative impacts to address these non-linear impacts from multiple stressors.	<p>Fishing activities within the WDA might be impacted to the extent fishing gear is entangled with protections placed over cables or around foundations of WTGs or ESPs. Maneuverability restrictions within the WDA as a result of the proposed Project could also result in the displacement of fishing vessels.</p> <p>Concerning vessel access to the WDA, temporary limited or restricted access areas (safety zones) may be set up around active construction areas where applicable. However, BOEM does not have the authority to restrict access to the WDA during operations. In addition, the USCG has stated that they will not restrict access to the WDA during operations. The USCG's authority to establish safety zones only extends to the boundary of the territorial waters of the United States, which is 12 nautical miles from shore and outside the WDA. Section 3.10.2 and Appendix A of the FEIS have been revised to include an expanded discussion of displaced vessels. For the displaced vessels, it is impossible to determine the alternative fishing locations as that will depend on individual choices.</p> <p>Section 3.3.7 of the DEIS acknowledged that NMFS determined that the gear associated with sink gill net and lobster pots has the potential to affect marine mammals. BOEM has determined that the potential for displacement of fixed gear from the Project area is low due to the gear able to be deployed in a fixed location. There is the potential that in the short-term sink gill net effort could shift into the Project area if catch is higher around wind turbine foundations. However, as evaluated in the DEIS and FEIS, this is considered a temporary effect as fishing effort would eventually depress any short-term increases in fish biomass.</p>

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0248-019	Most importantly, the DEIS does not analyze the potential impacts to NOAA surveys or the management decisions that rely on these surveys. To help address this concern, we provide additional information related to impacts on NOAA surveys in the attached document (Attachment A).	Additional clarification has been provided in Section 3.12 (Other Uses) of the FEIS regarding survey efforts potentially impacted by the proposed Project.
0248-020	...we request a second paragraph in Chapter 1 under Section 1, before Section 1.1 be added regarding NMFS' intentions to adopt this EIS. The paragraph should read as follows: "The National Marine Fisheries Service (NMFS), as a result of BOEM's proposed action, received an application pursuant to the Marine Mammal Protection Act (MMPA) for an Incidental Take Authorization (ITA) from Vineyard Wind and has an independent responsibility to comply with NEPA. Consistent with the One Federal Decision (OFD) requirements, NMFS is relying on the information and analyses in BOEM's EIS as it intends to adopt this EIS and sign a Record of Decision (ROD), if NMFS determines BOEM's EIS to be sufficient to support its separate proposed action and decision under the MMPA."	The proposed language has been included in Chapter 1 of the FEIS. Furthermore, a new section, Section C.1.2.6 in Appendix C, has been included in the FEIS on the marine mammal protection act and NMFS' responsibility.
0248-021	We recommend the FEIS also include discussion of how conditions in the remaining lease area might change once project construction activities begin and during operation.	Section 1.3 and Appendix A of the FEIS describe the potential future activity in the remaining lease area.
0248-022	[Section 2.1.1.1] it does not describe these [cable installation] methods in detail or when and under what environments these methods might be used. We suggest you provide a clearer explanation of construction methods to be used and the total area of impact for all technology proposed for construction.	The construction methods outlined in FEIS Section 2.1.1.1 have been updated with additional details and the EIS has incorporated by reference the details of the COP.
0248-023	The DEIS states, "In certain areas, alternative installation methods may be needed." As commented above, these alternative methods should be described in detail, to allow for evaluation of impacts to habitat and species that may be affected. Similarly, it is noted that Vineyard Wind could use several techniques to complete the dredging; however, these specific technique(s) are not described, but should be included in the evaluation of impacts.	The construction methods outlined in FEIS Section 2.1.1.1 have been updated with additional details.
0248-024	The DEIS states that up to 10 percent of the inter-array and offshore export cable corridor (OECC) would require protective measures. Justification for such a high percentage of cable protection along the project should be included and described in detail. Areas of anticipated cable protection should also be identified and described.	The FEIS Sections 3.1.2, 3.2.2, and 3.3.2, include a description of measures used to minimize cable protection. Vineyard Wind's May 7, 2019, COP Addendum Appendix A (Epsilon 2019) includes a cable burial risk assessment that indicates that cable burial would likely be highly successful along the majority of the OECC; any places where the target burial depth is not achieved would either be buried deeper using additional passes of the burial tool or would be protected (e.g., with rocks, concrete mattresses, or half-shell ducts). That document provides a map set of the expected burial confidence levels along the OECC. To be conservative, Vineyard Wind continues to maintain an estimate that up to 10 percent of the route may require cable protection. However, Vineyard Wind

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		considers cable burial a priority, and would prefer to use additional passes of the burial tool before resorting to hard cable protection.
0248-025	The DEIS states that Vineyard Wind will not propose, direct or implement any port improvements (page 2-8) for construction, operation, or maintenance of the project. Any port modifications or improvements conducted to accommodate this project, even if not directly conducted by Vineyard Wind, would be a direct result of the proposed action and must be described and analyzed in the EIS. Table 2.1-2, only provides a list of potential ports to be used for the project. More detail should be provided about which ports would be used and in what capacity.	Clarification to Section 2.1.1.2 and Appendix A of the FEIS has been added regarding use of the Vineyard Haven Harbor. The use of the Vineyard Haven Harbor as an Operations and Maintenance Facility is analyzed throughout the FEIS as part of the Proposed Action, but the proposed improvements to Vineyard Haven Harbor are not part of the Proposed Action because they are planned irrespective of the Proposed Project.
0248-026	The last paragraph under this subsection on page 2-10, describes a potential transit corridor through the project that will be determined based on stakeholder input. This section should provide more information on what stage in the process these corridors will formally be established, and how they will be integrated into the project analysis.	Section 2.1.1.2 of the FEIS has been updated to provide additional details regarding the transit corridor.
0248-027	... [the EIS suggests some]...alternatives would be inconsistent with EO 13807, with no explanation as to how these alternatives are inconsistent. This reasoning should be further clarified or removed from the DEIS. Other alternatives evaluated in the DEIS suggest potential delays due to the need for more survey work; however they are included as alternatives for consideration. Based on the description in this paragraph, a project that requires additional survey work would not be economically feasible. This is concerning, as this language suggests such these alternatives are already deemed “infeasible”. This language should be clarified or removed. We would also add that meeting the requirements of the power purchase agreements is not described under the purpose and need of the project so this language should be further clarified or removed.	While all the action alternatives considered in the DEIS, the SEIS, and the FEIS meet the purpose and need, some of the alternatives could require additional survey work as specified in Chapter 2 of the FEIS.
0248-028	In general, the DEIS heavily relies on cross-referencing the COP. During our review of the DEIS, we found it difficult to look up the referenced material. In a number of cases, information that was referenced in the DEIS was not accessible from the COP included on your website. When attempting to review referenced sections in the COP, many sections were redacted and inaccessible. In some cases, when the references were accessible, they were not referencing the correct sections or Appendices, as information did not match the discussion in the DEIS. There were also references to Appendices that did not have a table of contents or specific sections, making it difficult to find the specific material being referenced. Prior to issuance of the FEIS, all references should be verified to ensure they are accurate and accessible. We would also recommend providing hyperlinks to the specific referenced sections of the COP to provide easy access to the information considered in the analysis.	BOEM has reviewed the references to the COP for accuracy and availability of the information. Hyperlinks to the COP references have been added to the document.

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0248-029	Throughout Section 3, the DEIS should qualify whether impacts would be negative or positive in addition to providing the magnitude (e.g., the impact would be negative, but minor). When possible, note whether impacts will occur over the short term or the long term.	Section 3.0 and Tables 3-1 and 3-2 in Appendix B of the FEIS has been revised to define the impact levels applied to the adverse and beneficial impacts assessed in the document. In addition, the resource-specific sections in Chapter 3 and Appendix A of the FEIS have been updated to provide additional information related to the magnitude, duration, geographic extent, and/or frequency of potential impacts, as appropriate, to support impact determinations.
0248-030	If alternatives are to be combined “mix and match,” a matrix of impacts would help the public understand how the impacts would change if alternatives were mixed and matched.	The FEIS includes a section that compares all alternatives and has a detailed discussion on the expected impacts that would result from the Preferred Alternative, which “mixes and matches” components from Alternatives B and E.
0248-031	There is no discussion in this section about how the impact analysis would be changed by applying mitigation measures to the alternatives. The mitigation measures should be described in detail and assessed if they are to be used in making determinations about the scale of impacts.	Under each resource area in Chapter 3 and Appendix A of the FEIS, potential impacts are described as well as potential mitigation measures that could be implemented and if the measure would change the impact characterization. Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. Additional mitigation and monitoring measures may arise from consultations and coordination with Federal and State resource agencies. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0248-032	...we do not consider monitoring as a means of compensating for lost functions and values of marine resources. While some types of monitoring, such as real-time passive acoustics, may be considered mitigation, monitoring of project impacts should not be considered a measure to reduce impacts. We would recommend monitoring be considered as a separate entity of the project and that mitigation and monitoring not be used interchangeably in the document.	Appendix D of the FEIS has been updated as a result of this and other comments to distinguish mitigation and monitoring.
0248-033	The comparison of alternatives considered in the DEIS is limited, making it difficult to understand the differences in potential impacts among the alternatives considered. The DEIS does not quantify or provide details on the differences of impacts, but rather suggests impacts would be less, more, or the same as the proposed action. Absent a detailed comparison, there is limited support for the determination of differences among alternatives.	The comparison of alternatives in the FEIS was generally done in a qualitative manner. Furthermore, Section 2.5 of the FEIS has been included to identify the agency-preferred alternative.
0248-034	The habitat types [3.3.4.1] should be described in detail under the Project Area description.	Section 3.1.1 (formerly 3.3.4.1) of the FEIS has been updated to include additional information on habitat types.
0248-035	The COP sections referenced under “Aspects of Resources Potentially Affected” cannot be accessed on your website, as these sections have been redacted. This section refers to various Zones of habitat but there are no maps to accompany these descriptions and the references cannot be accessed. A map depicting the delineation of habitat in the project area should be included.	FEIS Section 3.1.1 and Figure E.3-1a through E.3-1e of Appendix E contain maps depicting the delineation of habitat in the OECC.

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0248-036	On page 3-49, the DEIS states that Vineyard Wind routed the OECC to avoid sensitive habitats (referred to as SSU, special, sensitive, and unique habitats). However, this is not accurate, as on that same page the document describes how the cable route will encounter hard/complex bottom habitats. It appears as though the project avoided previously mapped habitat, but did not, in fact, avoid sensitive habitats that were not previously mapped. This section should not state that sensitive and unique habitats were avoided, as that is not accurate.	The FEIS clarifies in Section 3.1.1 that Vineyard Wind routed the OECCs to avoid sensitive habitat to the greatest extent practicable, and discloses that the project is expected to impact certain areas with hard/complex bottom habitats.
0248-037	The DEIS should also describe what was done, if anything, to minimize impacts to hard bottom habitats that were found during surveys of the project area.	Hard-bottom habitats along the two Muskeget Channel Options, as well as the differences in potential impacts between the two and the process used for route selection, are described under Sections 3.1.1, 3.1.2, and 3.2.2 of the FEIS. Minimization measures are described in the revised Section 3.2.2.
0248-038	Page 3-49 also describes eelgrass that was found “nearby” the project area. The distance from the eelgrass should be provided as well as an accessible reference to an eelgrass survey report.	Section 3.1.2 of the FEIS details the distances between the cables and the eelgrass/hard-bottom complex.
0248-039	Under “Condition and Trend” on page 3-51, it states that “hard/complex bottom coastal habitat in this area is subject to change over time,” however, there is no evidence to support this conclusion. It is our understanding that the historical maps that are referred to in this document were not fully ground-truthed and a detailed survey of this area to delineate all hard bottom habitat was never conducted. Therefore, this conclusion cannot be substantiated. This paragraph is misleading and should be modified or removed.	Section 3.1.1 of the FEIS has been updated to remove the language in question.
0248-040	The development of an anchoring plan to avoid and minimize impacts to sensitive habitats should be included under the description of potential mitigation measures to minimize impacts of anchoring on coastal habitats.	Vineyard Wind’s proposed anchoring plan has been updated and included in Section 3.1.2 of the FEIS.
0248-041	When describing the extent of cable impacts (69 acres), it is not clear that this estimate includes indirect impacts, such as impacts from suspended sediment. This should be clarified. Both direct and indirect impacts should be evaluated and included in the estimate of project impacts.	The suggested clarification has been made in Section 3.1.2 of the FEIS.
0248-042	The terminology for construction activity is not clearly explained or used consistently throughout the DEIS. For example language describing methods to bury the OECC was described on page 3-53, but is not consistent throughout the DEIS. In addition, when describing the potential impacts of sedimentation on this page, it is not clear which construction method was considered in the analysis.	Sections 3.1 and 3.2 of the FEIS have been revised to harmonize terminology regarding cable burial. The revised FEIS contains clarification on the construction methods in the sediment transport model (see Section 3.1.2).
0248-043	When describing the distance from the eelgrass bed, it should be clarified if this 380 feet is from the centerline of the cable corridor, the edge of the corridor, or the edge of the entire work area. This information is important to clarify as impacts to eelgrass could still occur from construction activities, such as vessel anchoring, even if the cable itself is avoiding eelgrass beds.	Section 3.1.2 of the FEIS details the distances between the cables and the eelgrass/hard-bottom complex that the commenter has requested.

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0248-044	Shellfish beds are located within the project area; however impacts to shellfish beds are not discussed. This section should also evaluate impacts of sedimentation on shellfish beds from project activities.	The DEIS had already described potential impacts on shellfish beds under Sections 3.3.5.3 and 3.3.6.3, and the revised COP avoids Lewis Bay shellfish beds entirely.
0248-045	This section describes monitoring of coastal habitats as a mitigation measure. While monitoring is important to understand impacts of the project, it should not be considered mitigation. Further discussion is necessary regarding how impacts from the project on coastal habitats will be mitigated.	Section 3.1.2 of the FEIS has been revised to clarify that monitoring of coastal habitats would not reduce the level of impacts on this resource.
0248-046	...we have concerns that the benthic monitoring plan, as proposed in the COP, would not be sufficient to understand impacts of the project. Vineyard Wind and BOEM should work with the resource agencies to modify the benthic monitoring plan and in the development of additional resource monitoring plans.	Sections 3.1.2, 3.2.2, and 3.3.2 of the FEIS have been updated to include additional discussion of the proposed monitoring plans.
0248-047	The conclusion of net negligible impacts to coastal habitats is not fully supported by the document. In particular, the DEIS suggests the addition of hard protection would result in negligible to minor beneficial impacts. The extent of impacts and whether or not they are beneficial or negative may be dependent upon the location and habitat types to be impacted. While the project suggests 10 percent of the cable may require protection, it does not describe the location or habitat types that would be impacted, making it difficult to support conclusions related to the scale of impacts.	<p>Section 2.1.1 of the FEIS has been updated to address cable burial risk for the proposed Project. The OECC would have a target burial depth of 5-8 feet (1.5-2.5 meters). Vineyard Wind has conservatively estimated that 10 percent of the OECC would require protection, which equates to less than approximately 27.5 miles (44.3 kilometers).</p> <p>The DEIS and FEIS indicated that most of the proposed OECC lacks hard/complex bottom, and that it is likely that Vineyard Wind would add more hard-bottom area than would be damaged by protective installations. The conversion to hard-bottom could increase faunal diversity. Thus, the hard protection might result in a minor beneficial impact on coastal habitats.</p> <p>Sections 3.1.2, 3.2.2, and 3.3.2 of the FEIS have been revised to discuss mitigation measures related to cable protection. In addition, a mitigation measure for consideration has been added to Appendix D that, if implemented, would require a detailed submarine cable system burial plan to be submitted by Vineyard Wind that depicts precise location and burial depths of the entire cable system. This plan would be reviewed by the Coast Guard and approved by BOEM before construction of any component of the cable system begins.</p>
0248-048	It would be helpful if the analysis of this alternative [Alternative B] provided more details related to the differences in impacts on coastal habitats from the Covell's Beach and the New Hampshire Avenue landfall site.	Section 3.1.2 of the FEIS has been revised in light of COP revisions committing the proposed Project to the Covell's Beach landfall site.
0248-049	We have concern that the cumulative impact analysis only includes other projects that overlap the project area as well as a 1-mile buffer on all sides. Based on the modeling provided, impacts of sedimentation, particularly from inshore dredging, are expected to exceed 1 mile. A one mile restriction would not allow for indirect impacts to be evaluated and considered in the cumulative analysis.	Appendix A and Figure A.7-2 have been updated in the FEIS, but they maintain a 1-nautical mile buffer, and any impacts that affect coastal habitats in this area are considered in the updated Section 3.1, even if the source of the impact lies outside the buffer. In addition, Section 3.1.2 of the FEIS has been updated to provide additional information on dredging and sedimentation.

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0248-050	The DEIS states that Vineyard Wind is working with NMFS, as well as SMAST and BOEM on fisheries monitoring programs...Based on our initial feedback, we do expect to receive a monitoring plan from Vineyard Wind in the near future.	Thank you for your comment.
0248-051	The cumulative impacts analysis should also include dredging projects, including Federal Navigation Channels, as part of the cumulative analysis. This would be particularly important for analysis of cumulative impacts to coastal habitats.	The impact analysis in Appendix A of the FEIS has been revised to include dredging projects. No current or future foreseeable dredging projects fall within the revised geographic analysis area for coastal habitats, but the revised Section 3.1.1 of the FEIS considers dredging for navigation, marine minerals extraction, and/or military uses.
0248-052	Language regarding the Vineyard Wind anchoring management plan should be clarified (page 3- 57). Specifically the statement, “Although the above information was not available at the time of the preparation of this document, sufficient information exists to support the findings presented herein.” The document should clarify when the “sufficient information” described and analysis of that information would be made available.	More information has since become available, so FEIS Sections 3.2.3 and 3.2.4 have been revised. The FEIS also refers to the anchoring management plan described in the Final Environmental Impact Report to the State of MA.
0248-053	On page 3-58, the last paragraph under Regional Setting refers to section 5.1.1 of the COP for more information on benthic faunal communities, however, this section of the COP provides a limited description of dominant habitat types rather than information on benthic faunal communities. References throughout the document should be verified to ensure they are accessible and referencing the correct information.	Section 3.2.1 of the FEIS has been updated with a fuller description of benthic communities.
0248-054	Under Project Area, the DEIS refers to Table 3.2-2 in the COP; however this reference is not accessible from your website, as it suggests this section is “redacted”. This has occurred in other sections of the document that reference the COP and should be addressed throughout the document to ensure the public has the opportunity to review all of the referenced materials.	The FEIS has been updated to instead refer to Figure 2.5-2 in the COP Addendum.
0248-055	We agree with the statement in the DEIS that the “degree of potential impacts would vary seasonally depending on the life histories of benthic organisms.” However, there is limited information related to the timing of each construction activity. The timing of construction activities should be described and incorporated in the analysis. This is particularly important for sensitive life stages, such as spawning activity and demersal eggs.	Section 3.2.2 of the FEIS has been updated to include information about the spawning seasons of major benthic organisms and considers this in the impact analysis.
0248-056	The conclusion that impacts to benthic resources would be negligible from the project is not supported by the information provided in this section. This section [Section 3.3.5.1] outlines a list of potential impacts but does not describe the extent of impacts or provide an adequate analysis to support a finding of negligible impacts. Overall, the conclusion that impacts from routine activities are negligible do not appear to meet the definition of impact level as described in Table 3.1-1.	Sections 3.2.2 to 3.2.6 of the FEIS have been updated to describe the potential impacts and provide justification for determining the level of likely impacts. Several potential impacts would be more than negligible, and the FEIS does not state that impacts on benthic resources would be negligible overall.

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0248-057	Additional detail should be provided related to activities impacting benthic resources. Specifically, on page 3-61 clarify which construction and installation activities are being considered for the combined area of impact of 221 acres. More detail should be included in the document.	Section 3.2.2 of the FEIS has been revised to clarify the activities contributing to various impacts.
0248-058	References should be provided for the sensitivity thresholds stated for sediment deposition on demersal eggs (pages 3-61 to 3-62). References for these thresholds should be included rather than simply referencing the COP.	Section 3.2.2 of the FEIS includes references to the original sources.
0248-059	This section does not provide any discussion of how impacts to benthic resources would be minimized. It only discusses monitoring and mitigation measures that were considered but eliminated. The section [Section 3.3.5.3] should describe why hard bottom habitats were not avoided, and what would be done to minimize impacts when determining the final cable alignment.	Section 3.2.2 (formerly 3.3.5.3) of the FEIS has been revised to explain that cable installation would use micro-routing to avoid hard-bottom habitat to the greatest extent practicable.
0248-060	The project is expected to directly and indirectly impact hard bottom habitat, including designated Habitat Area of Particular Concern (HAPC) for juvenile Atlantic cod, but the analysis of these impacts is limited. Furthermore, the DEIS should justify the estimated 10 percent of the cable area requiring protection. These areas requiring additional protection should be identified and illustrated.	Section 3.3.2 of the FEIS has been updated to clarify juvenile cod. For additional detailed information on HAPC, please refer to the EFH Assessment, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ . Concerning the estimated 10 percent of the cable area requiring protection, please refer to comments 081-010 and 092-046.
0248-061	More information should be provided on the model that was done to estimate impacts to suspended sediment, specifically what construction method and sediment type was used in this evaluation.	Section 3.2.2 of the FEIS has been revised to describe the modeled sediment composition and construction method.
0248-062	There is no discussion in this section on impacts of the project to epifauna which is an important benthic resource found on hard/bottom/complex habitats. Impacts to hard bottom habitat, including juvenile cod HAPC, should be better characterized and described in detail.	The FEIS has been revised to discuss potential impact on epifauna of hard substrates in Section 3.2.2.
0248-063	This section [Section 3.3.5.3] does not provide any analysis or evaluation of impacts from project noise, such as pile driving. Acoustic impacts, particularly to benthic organisms, eggs and larvae should be analyzed and addressed. The WDA and cable route are known to support a number of shellfish species and represents one of the primary documented spawning locations for longfin squid, which have demersal eggs. Impacts of benthic resources from pile driving activities should also be analyzed.	The FEIS has been revised to discuss potential impact on pile driving on benthic resources in Section 3.2.2 (formerly 3.3.5.3).
0248-064	Page 3-64 refers to a benthic monitoring plan prepared by Vineyard Wind. While monitoring is important, it is not clear how this is considered a method to minimize impacts of the project.	Section 3.2.2 of the FEIS has been updated to clarify that the benthic monitoring plan would not reduce potential impacts of construction, but its results could be used to reduce the impacts of decommissioning or of other future offshore projects.
0248-065	Our agency was not consulted in the development of this [benthic monitoring] plan and we have significant concerns...This monitoring plan should be revised in consultation with the resource agencies.	Section 3.2.2 of the FEIS cites the COP for details on the benthic monitoring plan, which has been updated. BOEM will be coordinating with NMFS on the development of the benthic monitoring plan. The FEIS has been updated to include monitoring initiatives to ensure documentation of potential effects on

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		benthic resources. Mitigation measures that could be included as a condition of COP approval are included in Appendix D of the FEIS. Note that additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0248-066	More information should be provided related to the habitat in the project area, particularly delineation of habitat types, including the transition from sand to mud in the wind development area and delineation of habitat types along the cable route.	The FEIS has been revised to contain maps depicting the delineation of habitat in the Project area. The FEIS also includes a description of substrate composition within the WDA. Sections 3.1.1, 3.2.1, and Appendix E, Figures E.3-1a through E.3-1e of the FEIS have been updated. The EFH Assessment (available on BOEM’s project website and incorporated by reference into the FEIS) also includes detailed maps showing seafloor habitats within the proposed Project area.
0248-067	The document concludes that the impact of scour on benthic resources is minor, but the information provided does not sufficiently support this conclusion. The extent of impacts resulting from scour, including turbidity from scour, are not clearly analyzed in the document.	Section 3.2.2 of the FEIS has been updated to reference the COP Appendix III-K, which includes an analysis supporting the conclusion that scour would be unlikely to occur at the proposed Project with scour protection. The EFH Assessment also contains additional details on scour and specific effects from sedimentation.
0248-068	The document concludes that impacts of EMF on benthic resources is negligible, but the information provided does not sufficiently support this conclusion. The DEIS should evaluate existing literature and recognize information that remains unknown around EMF. Without adequate study on the effects of EMF and heat from transmission cables on invertebrates, the conclusion that impacts would be negligible for demersal species and life stages is not supported.	Sections 3.2 and 3.3 of the FEIS have been revised to discuss the effects of EMF on benthic resources and finfish and commercially important invertebrates, respectively.
0248-069	The difference between the two cable routes [for Alternative B] should be compared in this analysis.	Section 2.1.1 of the FEIS has been updated in light of COP revisions committing the proposed Project to the Covell’s Beach landfall site.
0248-070	There is still dredging associated with HDD but this is not described in the document. These impacts should be described and analyzed in the document.	Sections 2.1.1.1, 3.2.2, and 3.1.2 of the FEIS have been revised to include a discussion of the impacts of HDD-related dredging.
0248-071	The document [Alternative C] states that “there is no evidence that the assemblages found in the southern WDA are of greater ecological importance that assemblages in the northern WDA.” It is not clear if this statement is based on samples that were collected by Vineyard Wind. This statement should be clarified and the evidence used to conclude this statement should be provided.	Section 3.2.3 of the FEIS has been revised to clarify the potential differences within the northern and southern portions of the WDA.
0248-072	The document [Alternative D] refers to impacts of additional surveys that would be needed for Alternative D1 and D2. Please clarify why this analysis is part of the DEIS. It is our understanding that all site characterization activities were evaluated as part of the SAP. As a result, it is not clear why these are considered an additional impact of this alternative.	Section 3.2.3 of the FEIS clarifies that the surveys would be geotechnical and/or engineering surveys necessary to determine the new WTG placements.
0248-073	This section [Alternative E] states “BOEM cannot at this time calculate the magnitude of reduction.” However, the reduction in size alternative is calling for	Section 3.2.4 of the FEIS includes a description of the reduced project footprint and corresponding potential impacts.

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	84 turbines specifically. It is not clear why at least an estimate of reduced project footprint or benthic impacts would not be included in this section.	
0248-074	Some of the conclusions drawn [in Section 3.3.5.9] related to the extent of impacts to benthic resources has not been adequately supported by the information provided in the document.	The FEIS has been updated to include justification for the level of each impact determination in Section 3.2.2.
0248-075	This section [3.3.5.9 Comparison of Alternatives] suggests the proposed action and Alternative B differ only on their impact to horseshoe crabs. There is no mention of winter flounder benthic life stages or shellfish resources. There are differences in the benthic resources found along the two proposed cable routes and this should be described and analyzed in the document.	Section 3.2.2 of the FEIS has been updated in light of COP revisions committing the proposed Project to the Covell’s Beach landfall site. Winter flounder and other commercially important finfish and shellfish are discussed in Section 3.3.2 of the FEIS.
0248-076	This section [3.3.5.9 Comparison of Alternatives] also seems to compare all the alternatives to the Proposed Action rather than comparing impacts of the alternatives to each other.	BOEM believes that the comparison of alternatives presented in the EIS allows the decision maker to assess what are the differences in impacts between all alternatives.
0248-077	It is not clear why 10 mg/L was selected as the criteria for limiting the cumulative impacts analysis on benthic resources to a ten-mile radius of the project. A broader consideration of the cumulative impacts should be considered, or a justification for this criteria should be clearly articulated in the document.	The FEIS has been revised to explain how the boundary was selected in Sections 3.2.2 to 3.2.5.
0248-078	This section does not address cumulative impacts of turbidity from scouring associated with the project or adjacent projects. This analysis should be included.	FEIS Section 3.2.2 has been updated to assess impacts of turbidity and scour on benthic resources. There would likely be no additive effect of scour from the Project and other activities.
0248-079	The cumulative impacts of this project and other activities to benthic resources would expect to be at least the level identified in the project analysis. The conclusion that cumulative impacts would be negligible to minor for benthic resources is not well supported. Activities in adjacent areas conducted either simultaneously or sequentially could result in greater impacts to shellfish resources and demersal sensitive life stages.	The FEIS has been updated to address this comment in Section 3.2.
0248-080	We have concerns about the conclusion that fisheries management measures alone would be able to ensure the cumulative impact would be unlikely to cause population-level effects, as suggested on page 3-71. It is not the responsibility of fishery management measures to account for all impacts to marine resources, regardless of the source. Fishery management measures cannot control for or mitigate the impacts caused by other projects, including the proposed action, and can only affect fishery removals. More information should be provided related to how potential population level impacts are assessed. A conclusion that population level impacts would not occur needs to be supported.	The FEIS clarifies that fisheries management measures are impact-producing factors, not measures to modify the impact of the proposed Project. The level of fishing effort is regulated by fisheries management. If the stock decreases, effort would decrease through fishery management. BOEM was not relying on fishery management to address impacts from offshore wind. The revised FEIS Sections 3.2.2 to 3.2.5 now include justifications based on the available habitat in the region. Also, the impact determinations have been revised, in some cases from “minor” or “minor to moderate” to the new level of “moderate.”
0248-081	Maps from the Massachusetts Ocean Management Plan referenced in this section [Section 3.3.5.11] were not fully ground-truthed. This should not be the only source used to make a conclusion that hard/bottom habitats were avoided to the	Section 3.2.2 and Appendix E of the FEIS have been updated to include seafloor habitat maps based on the results of 2018 surveys, and explains how impacts would be minimized in Section 3.2.2 of the FEIS.

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	greatest extent practicable. Surveys conducted for the project should be used to further avoid/minimize impacts to hard bottom. This section also states that Vineyard Wind would minimize the amount of impacts “to the greatest extent possible”. This should be described in the analysis as it is not clear how this would be done.	
0248-082	This section indicates that the project area overlaps with Habitat Areas of Particular Concern (HAPC) for juvenile Atlantic cod. However, it does not provide any information or details related to the extent of HAPC impacts. Rather, the DEIS only states that the proportion of HAPC affected is small compared to all the HAPC that extends to the Canadian border. This is not a sufficient analysis of impacts to HAPC. HAPCs are designated as high priorities for conservation due to the major ecological functions they provide and their vulnerability to degradation. More information should be provided in the analysis related to the extent and type of impacts, how impacts to this important habitat would be minimized, and proposed mitigation for any unavoidable impacts to this habitat.	Sections 3.3.1 and 3.3.2 of the FEIS have been revised and discusses the extent of juvenile cod HAPC and the degree of impact.
0248-083	This section references the analyses of effects to ESA listed fish, including Atlantic sturgeon, which is included in the Biological Assessment (BA). However, because the BA is not an appendix to the DEIS, the DEIS actually contains little analysis of effects of the project on Atlantic sturgeon. While we recognize the page restrictions that BOEM is working under, the DEIS should at least provide a summary of anticipated effects to ESA listed fish for all alternatives considered.	The revised FEIS Section 3.3.2 incorporates by reference the Atlantic sturgeon acoustic effects analysis from the Biological Assessment. Section 3.3 of the FEIS incorporates the EFH Assessment by reference and includes a summary of construction-related effects to finfish, invertebrates, and EFH. Sections C.1.2.2.1, C.1.2.5, and C.1.2.6 in Appendix C of the FEIS include a discussion on NMFS coordination and consultation as part of the EIS. The EFH Assessment can be found on at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ .
0248-084	The conclusion that impacts to fish, invertebrates, and EFH is likely to be negligible at a stock level is not well supported by the information in this section. There is limited discussion related to spawning and reproduction occurring in the project area and how the project may impact spawning events and habitat.	This document and the EFH Assessment do not specifically assess ESA Candidate Species or Species of Concern in the region that do not have designated EFH near the proposed Project area, nor does it specify likely effects on individual fish stocks, because an assessment of species-specific or stock-specific effects is outside of the scope of this document. However, some of these species and stocks use habitat types present in the Project area. This section provides general descriptions of potential impacts on finfish, invertebrates, and EFH; an assessment of species-specific or stock-specific effects is outside of the scope of this document.
0248-085	While we would agree that habitat alteration is an impact of construction, this should also be evaluated as an impact associated with operation of the project. The DEIS suggests habitat alteration would be a “long-term” and “temporary” impact. However, we would consider habitat alteration to be a permanent impact given the life of the project may exceed 25 years.	Section 3.3.2 of the FEIS has been updated to clarify that habitat conversion from soft to hard would be long-term, but reversible during decommissioning. Other impacts in Section 3.3 of the FEIS are now temporary (not short-term) or permanent (in the case of hard-bottom habitat converted to soft-bottom habitat).
0248-086	While we agree that long-term regional monitoring is necessary for this and other offshore energy projects, such monitoring will not reduce impacts and should not	Section 3.3.2 of the FEIS has been revised to clarify that Vineyard Wind has already committed to monitoring and that BOEM is considering making it a

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	be considered a mitigation measure. Further, it is not clear if BOEM will require such monitoring as a condition of COP approval. We would recommend coordination with the resources agencies be conducted during the development of any monitoring plan.	condition of COP approval. It also clarifies that monitoring would not reduce construction impacts. During the decision-making process, BOEM could require that Vineyard Wind coordinate with relevant fisheries management agencies when developing and implementing the monitoring plan.
0248-087	More information should be provided related to the expected area of impact from turbidity plumes and sedimentation. The analysis should evaluate the area of impact and the resources to be impacted. Further analysis is needed to support the conclusion that impacts associated with turbidity and sediment deposition would be minor.	Section 3.3.2 of the FEIS has been revised to justify the impact determination and refers the reader to Section A.8.2.2 in Appendix A of the FEIS for a description of the extent and degree of changes in turbidity.
0248-088	The DEIS only discusses impacts to hard bottom habitat occurring from sedimentation. It is our understanding that the cable will be run through hard bottom habitat, including HAPC for juvenile Atlantic cod. The method for laying cable through hard bottom/complex habitats should be described in detail and impacts of this construction activity should be evaluated in the document.	Section 3.3.2 of the FEIS has been revised to discuss impacts on hard-bottom habitat, including HAPC for juvenile cod, from turbidity, sedimentation, conversion to soft bottom, and disturbance by hard cable protection.
0248-089	The pile driving section does not adequately address the impacts of particle motion on fish species. The extent of area impacted by particle motion from pile driving activities should be illustrated and impacts to fish and invertebrates, including mortality, injury, and behavioral responses should be discussed. Table 3.3.6-1 should also include expected areas of impact for invertebrates as well as fish.	Section 3.3.2 of the FEIS has been revised to include a discussion of particle motion and why it was not used to assess injury and behavioral effects to fish and invertebrates.
0248-090	It is not clear why impacts of pile driving is classified as minor when the area of impact extends substantially outside the project area. This conclusion is not well supported. The DEIS classifies impacts of pile driving to be the same as impacts of vessel noise during construction which does not seem to be supported by the expected noise levels and area of impact.	Section 3.3.2 of the FEIS has been revised to clarify the expected effects of pile driving noise and explains how the level of impact was assessed.
0248-091	The DEIS also states the duration of time is short; however it is our understanding that pile driving may be ongoing for 6-8 months. More specific information related to timing and time of year of pile driving activities should be included. The detailed schedule for pile driving is redacted as confidential business information (COP Chapter 4, Figure 4.1). This information should be made available and incorporated in the analysis.	Section 3.3.2 of the FEIS has been updated to include a statement that pile driving would occur from July through December 2020. Figure 4.1 of COP Section 4.1, Volume I, is available on the Project website and is not redacted. The COP can be found at the following link: https://www.boem.gov/Vineyard-Wind/
0248-092	The DEIS classifies impacts of reef effect as a moderate beneficial impact (page 3-79). However, the DEIS also sites a previous MMS report from 2009 which suggests the vertical monopile structures are not anticipated to provide a true artificial reef due to the low quality of interstitial spaces available. Another citation referenced indicates the benefits to fish and invertebrates are inconclusive (Causon and Gill 2018). The studies referred to in the analysis do not support the conclusion related to the scale of impacts.	Section 3.3.2 of the FEIS has been clarified to indicate that the scour protection, not the vertical WTG foundations, would create a reef effect. The reef effect has been observed around WTGs, leading to local increases in biomass and diversity (Causon and Gill 2018). Although some studies have noted increased biomass and increased production of particulate organic matter by epifauna growing on submerged foundations, it is not clear to what extent the reef effect results in increased productivity versus simply attracting and aggregating fish from the surrounding areas (Causon and Gill 2018).

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0248-093	In addition, the discussion on reef effect does not include an analysis on potential shifts in distribution of species that may prefer more complex structures. For example, black sea bass are a species that migrate through the project area to move inshore to rocky habitats to spawn. There is no discussion on how the introduction of hard habitat offshore may impact migration or nearshore populations. Further analysis should be conducted and additional studies should be referenced to support this conclusion of a moderate beneficial impact.	Section 3.3.2 of the FEIS has been updated to include a discussion of potential species shifts related to new hard structure.
0248-094	More specific information should be provided related to the proposed cable protection and habitats that would be impacted from that protection. Absent that information, it is difficult to generalize that cable protection would result in a moderate beneficial impact. The limited information provided in the DEIS does not support that conclusion.	Additional information has been included in the FEIS, Section 3.3.2, related to proposed cable protection and potential effects. It clarifies that there would be moderate negative impacts, although it could benefit species of hard-bottom communities.
0248-095	The assessment of operational impacts on habitat should not be limited to reef effect. The DEIS should evaluate operational impacts of habitat alteration including habitat conversion and pelagic habitat impacts of the project.	Section 3.3.2 of the FEIS has been revised to discuss pelagic zone changes and habitat alteration in greater detail. The revised conclusion clarifies that foundations could affect pelagic habitat.
0248-096	There is one sentence under the conclusion section that addresses a modeling study related to larval transport. While it is important to discuss this modeling study, this subject warrants a specific analysis that addresses potential pelagic impacts of project operation, including larval transport, hydrodynamics and mixing. This discussion should not be limited to the conclusion of the section.	Section 3.3.2 of the FEIS has been revised to discuss pelagic zone changes and habitat alteration in greater detail. The revised conclusion clarifies that foundations could affect pelagic habitat. The EFH Assessment also includes additional information.
0248-097	Loss of demersal eggs and impacts of disruption of larval transport and recruitment is not limited to unspecified flounder stocks. . . .The FEIS should reflect impacts to all species or species groups rather than singular examples.	This FEIS and the EFH Assessment do not specify likely effects on individual fish stocks, because an assessment of species-specific or stock-specific effects is outside of the scope of this document. However, some of these species and stocks use habitat types present in the Project area. The FEIS provides descriptions and analysis of potential impacts on finfish, invertebrates, and EFH generally in Section 3.3.
0248-098	The conclusion suggests that activities will primarily impact benthic habitat and are not as likely to impact species or life stages that depend on pelagic habitat. While we agree that benthic habitats will be impacted, this statement downplays the impacts to pelagic habitats, which are not adequately addressed in this analysis.	Section 3.3.2 of the FEIS has been revised to discuss pelagic zone changes and habitat alteration in greater detail. The revised conclusion clarifies that foundations could affect pelagic habitat.
0248-099	The analysis related to EMF impacts is limited. The DEIS does not present sufficient evidence with two references to support the claim that there “is no evidence that EMF would result in population-scale negative impacts,” (p 3-80). The document suggests impacts will be mitigated by burial or shielding of the cable; however, there is no discussion of how or to what extent these methods minimize impacts to marine species. While additional references to studies have been added since our preliminary cooperating agency review, the analysis	The Scott et al. (2018) study has been added and cited and compared to the proposed Project in Section 3.3.2 of the FEIS. Note that effects were seen only at field strengths greater than 150 times the field strength expected directly over Vineyard Wind’s proposed cables (Epsilon 2018c). BOEM’s risk assessment is not based on burial depth alone. The shielding material around the conductors is sufficient to drastically reduce the electric field (Epsilon 2018a), while Epsilon (2018c) indicates that the depth of cable burial is a key factor for reducing the

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	provides limited discussion on the lack of information that exists related to EMF impacts on marine fish and invertebrate species.	magnetic field. As described in Normandeau et al. (2011), cable burial and shielding should be effective in minimizing EMF.
0248-100	This section [Section 3.3.6.4] does not provide any information on the difference between the two cable routes or the locations where the cable would come to shore. There are differences in the fish and invertebrate species comprising the two locations; however, they are not analyzed in this DEIS.	Section 3.2.2 of the FEIS has been updated in light of COP revisions committing the proposed Project to the Covell’s Beach landfall site.
0248-101	The DEIS states [Section 3.3.6.5, Alternative C] that “an indirect impact of reducing conflict with commercial fishing vessels is the potential for slightly higher harvests of commercial fish species that might be shielded from harvest under the Proposed Action.” This statement is unclear - it seems to suggest that commercial fishing activity will be excluded from the project area, and therefore some fish will be inaccessible to harvest, while also suggesting this will lead to higher commercial catch rates. This is inconsistent with other sections of the DEIS that indicate commercial fishermen would not be excluded from fishing in the WDA (Table ES-2, page ES-8).	The FEIS has been updated to correct the referenced inconsistency.
0248-102	The DEIS suggests [Alternative D1 and D2] new surveys to establish site conditions are impacts of this alternative. It is our understanding that impacts of site assessment activities are analyzed in the Site Assessment Plan. It is not clear why additional site characterization surveys would be considered an impact under this alternative.	Sections 2.1.3.1, 2.1.3.2, 3.2.3, and 3.3.3 of the FEIS clarify that the surveys would be geotechnical and/or engineering surveys necessary to determine the new WTG placements.
0248-103	The DEIS [Alternative D1 and D2] does not provide any quantitative information related to the extent of extra cable that would be required under this alternative. This should be included in the analysis.	Although the precise amount of cable required under this alternative cannot be known until additional siting surveys are completed, the amount and length of inter-array cabling would be more than under the Proposed Action but would not exceed the maximum design parameter as outlined in Appendix G of the DEIS of 171 miles (275 kilometers). Therefore, no changes to the FEIS are warranted.
0248-104	The DEIS [Alternative E] does not provide any quantitative information related to the extent of impacts that would be reduced under this alternative. This should be included in the analysis.	Section 3.3.3 of the FEIS includes a description of the reduced project footprint and corresponding potential impacts.
0248-105	This section [Section 3.3.6.9] is limited and does not adequately compare the alternatives. The comparison of these alternatives should be more clearly defined and analyzed.	Section 3.3.5 (formerly 3.3.6.9) of the FEIS has been revised to explain why the levels of impacts are the same across all alternatives.
0248-106	The analysis under cumulative impacts is limited and the scale of impacts identified is not supported by the information provided.	Section 3.3 of the FEIS clarifies the scale of impacts and justifies the impact determinations.
0248-107	The cumulative impacts analysis suggests cumulative impacts of EMF is negligible. However, impacts of the proposed action evaluated in the earlier section identifies EMF as a minor impact. It is not clear how impacts to EMF would be considered less with multiple projects than it would with the proposed action. This conclusion is not supported by the information provided and does not appear to meet the definition of negligible impacts as described in section 3.1.	The suggested edit has been made in Section 3.3 of the FEIS. The incremental impact of EMF is expected to be minor and the impact of EMF from planned actions, in the context of reasonably foreseeable environmental trends, is expected to be minor.

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0248-108	While this section discusses cumulative impacts of long-term conversion of habitat within the Northeast Shelf LME, this is not analyzed specifically for the project. Only reef effect is analyzed. The impact of habitat alteration from operation of multiple projects should be evaluated for both the proposed action and the cumulative impacts analysis. The expected timing of construction and overlapping or consecutive seasons of construction should be also be evaluated in assessing cumulative impacts to finfish, invertebrates, and EFH.	The suggested change has been made in Section 3.3 of the FEIS.
0248-109	The cumulative impacts section discusses fisheries use and management programs that regulate fishing in and around the project and suggests that the project would have minor cumulative impacts on these management programs. However, information to support this conclusion is not provided in the analysis.	Section 3.3 of the FEIS have been revised to include justifications for impact determinations and clarifies that fishing and fisheries management activities would contribute to impacts alongside the proposed Project
0248-110	It is not clear why some of the information listed in this section [Section 3.3.6.11] is not yet available. For example, the amount of hard bottom habitat should be included in the COP and is necessary to assess impacts to juvenile cod HAPC. The DEIS should clarify when this information will be made available.	Since this information has recently become available, the suggested clarification has been made in Section 3.3.2 of the FEIS.
0248-111	Furthermore [Section 3.3.6.11], the absence of such information, particularly the acoustic impacts of large monopile pile driving on juvenile and adult fish and invertebrate species, makes it difficult to support the conclusion that effects on such species are minor.	Section 3.3.2 of the FEIS clarifies that auditory thresholds have not been developed for many specific species. However, the thresholds presented in Table 3.3-2 represent the best available scientific information that supports the conclusion that population level impacts on fish and invertebrates from pile driving is minor. Please refer to the EFH Assessment and the Biological Assessment to NMFS for more details.
0248-112	For Sections 3.3.7 through 3.3.7.9, and all referenced and associated materials and appendices, we suggest that you review the FEIS to ensure certain terminology is correct and used consistently throughout. Specifically, type of harassment (Level A and Level B), use of whales versus marine mammals, listed versus not listed, and overall consistency associated with use of common name, species name or just marine mammals. For example, there are still instances where terminology is not correct (i.e., “Level A threshold” “Level A and Level B Acoustic thresholds” when it should be “Level A Harassment” and “Level B Harassment”).	Section 3.4 (formerly 3.2.7) of the FEIS has been updated to rectified use of “listed”; Latin species name given at first appearance of each species; use of “whale” vs “marine mammal” and use of “Level A Harassment” and “Level B Harassment”. The Biological Assessment has also been updated to address the comment.
0248-113	Additionally, because the definitions of “harassment” are different under the ESA and the MMPA it is important that the document clarify, wherever relevant, which definition is being referenced.	Section 3.4 of the FEIS has been updated to impact characterization for NEPA and ESA.
0248-114	Marine mammals are protected under the MMPA, not listed. For the last sentence in the first paragraph on page 3-87, we suggest you rephrase it to say: “All marine mammals occurring in the proposed project area are protected under the Marine Mammal Protection Act. There are thirty-three marine mammal species, not listed under the ESA, that may be found in the region, including 2 baleen whale species, 27 toothed whale species, and 4 seal species.”	Section 3.4 of the FEIS has been updated to address the terminology.

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0248-115	On pages 3-86 through 3-93, the discussion about the marine mammal species in the project area is incomplete. Including a table listing all marine mammal species or tables showing other data about marine mammal species occurrence is fine. However, only describing a few marine mammals and not others is misleading and does not provide the correct context associated with conclusions about negligible, minor, moderate, or major impacts to marine mammals later in this section. For example, all discussion points under “Current Conditions and Trend” on page 3-89 to the top of 3-93 does not link to why these specific points about some marine mammal species is relevant to the environmental consequences discussion for each alternative.	Section 3.4 of the FEIS has been updated in coordination with NMFS to address which species of marine mammals should be discussed. Further discussion of these resources is provided in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ .
0248-116	Please provide (page 3-93) an introduction to marine mammal hearing and effects of sound, a discussion about the analysis approach and methodology, and other relevant information about the assessment of impacts to marine mammals. For example, all the information about acoustic sources, marine mammal hearing, and effects of sound should be provided as baseline and qualitative discussion about impacts to marine mammals, in layman’s terms so the public can understand. There is good information in this section of the draft, however, certain explanations (i.e., the technical discussions about takes and take estimates) should be moved to an appendix so this information does not detract from the explanations and analysis we need the public to understand. This can be replaced with a brief explanation about how take estimates are factored into the overall determinations about effects to marine mammals, with a reference to an appendix containing a quantitative analysis. In other words, we recommend a qualitative analysis about impacts to marine mammals within Chapter 3 and to work with our agency on the methodology for estimating takes as an appendix for the quantitative analysis.	Section 3.4.2 of the FEIS has been updated in coordination with NMFS for a background discussion of marine mammal hearing and the potential adverse impacts on marine mammals resulting from noise. Further detailed, technical discussion regarding noise impacts on marine mammals is provided in Appendix F of the FEIS. Further discussion of these resources is provided in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ .
0248-117	Regarding pages 3-93 through 3-97, the discussion under impacts of Alternative A to marine mammals relies too heavily on reciting numbers provided by the project proponent in the COP (i.e., take numbers, percentages of stocks taken, and isopleths to harassment zones). Use of specific take numbers, including percentages of populations taken, and isopleths to thresholds are not adequate to draw conclusions about impacts to marine mammals. This section should instead provide a summary of available literature on impacts of pile driving noise on marine mammals to reach conclusions on relative impact levels (similar to how impacts of vessel traffic are treated, starting on p. 3-97). The numbers and information derived from the COP are not a substitute for this analysis.	Section 3.4 of the FEIS has been updated in coordination with NMFS. Detailed, technical discussion regarding noise impacts on marine mammals is provided in Appendix F of the FEIS. The modeling undertaken and reported in the COP was completed in coordination between Vineyard Wind, NOAA, and BOEM. State of the art modeling has been used to quantify the amount of exposure of marine mammals to underwater sound, but is not the only information that is used in the impact assessment. NOAA will further assess appropriate take numbers in issuance of an Incidental Take Authorization under the Marine Mammal Protection Act. Further discussion of these resources is provided in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ . In April 2019, NMFS provided a Draft IHA, and the information provided was taken in to consideration during the development of the FEIS.

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0248-118	Also, please note, take numbers provided in the COP are preliminary – the take numbers ultimately proposed for authorization by NMFS may be different than the numbers provided in the COP, thus inclusion of these preliminary numbers in the EIS will result in confusion. Any inclusion of these numbers should be moved to an appendix and clearly explain in layman’s terms, the methodology used in the modeling approach.	Section 3.4.2 of the FEIS has been updated in coordination with NMFS for a background discussion of marine mammal hearing and the potential adverse impacts on marine mammals resulting from noise. Further detailed, technical discussion regarding noise impacts on marine mammals is provided in Appendix F of the FEIS.
0248-119	It is not clear how the discussion of the risk of vessel strike considers the operation of vessels outside the immediate project area and the transit routes to the primary ports to be used for crew transport. For example, it does not appear that the vessel strike assessment considers the vessels that are anticipated to travel to the project area from ports in Canada.	Section 3.4.2 of the FEIS has been updated in coordination with NMFS for a discussion of impacts on marine mammal resulting from vessel strikes. Further discussion of these resources is provided in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ .
0248-120	This assessment also does not appear to consider how any anticipated shifts in baseline (i.e., non-project) vessel traffic due to the construction and operation of the project may alter the risk of vessel strike to marine mammals.	Section 3.4.2 of the FEIS has been updated in coordination with NMFS for a discussion of impacts on marine mammal resulting from vessel strikes. Further discussion of these resources is provided in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ .
0248-121	It is unclear how this section considers the distribution and abundance of sea turtles along the transit routes to and from ports in Canada. For example, the project area is described as including the “vessel transit to and from ports that will support proposed Project activities...” but the information in this section only appears to address sea turtles off Rhode Island and Massachusetts.	Section 3.5.2 of the FEIS has been updated to include a discussion on construction and installation effects on sea turtles, specifically potential for vessel strikes to sea turtles. Further discussion of sea turtle occurrence and potential impacts are provided in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ .
0248-122	There are numerous points in this section [Section 3.3.8.3] where the BA is referenced with conclusions reached in the DEIS with no supporting information (e.g., noise associated with the operations of the WTG). Because the BA is not appended to the DEIS, this results in an incomplete analysis of effects of the action on sea turtles in the DEIS.	Sections C.1.2.2.1, C.1.2.5, and C.1.2.6 in Appendix C in the FEIS have been updated on the NMFS coordination and consultation as part of the EIS. The EFH Assessment has been incorporated by reference and summarized in the EIS. Section 3.3.8 of the DEIS included summary information from the Biological Assessment on sea turtles. The FEIS has been updated to include additional justifications, where warranted. The Biological Assessment submitted to NOAA can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ .
0248-123	Please provide an introduction to sea turtle hearing and the thresholds being used as the basis for the analysis. While this information is included in the BA, the BA is not an appendix to the DEIS, and this information is critical to understanding the effects of the action on sea turtles.	Section 3.5.2 of the FEIS has incorporated additional text on sea turtle hearing and the thresholds being used for the analysis.
0248-124	The use of the “Level A threshold” and “Level B threshold” terminology is inappropriate when considering effects of sound exposure to sea turtles as those are terms of art related to the MMPA. This section needs to be written in the	Section 3.5.2 of the FEIS has been updated to address the terminology.

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	context of the appropriate ESA terminology and be consistent with current definitions of take, including harm and harassment.	
0248-125	It is our understanding that the DEIS estimates the number of adult sea turtles that will be exposed to potentially disturbing levels of noise each day. The document notes that the “number of juveniles is not available”; no information is provided on how you considered juveniles in this analysis. If juveniles were not considered in the analysis, the analysis is incomplete and would not represent an accurate and reasonable assessment of effects of pile driving on sea turtles in the project area. The pile driving analysis also fails to address what the impacts to individual sea turtles are from exposure to disturbing levels of noise, including impacts of avoiding the noisy areas during construction. Further, while the document concludes that no mortal injury is anticipated, there is no conclusion reached regarding lesser injuries and their impacts to individuals.	The density estimates do not explicitly include an age-based analysis, nor do the aerial survey datasets provide size classes that can be analyzed to determine the number of juveniles. Of the 156 sea turtle sightings, none were reported to be juveniles, but the size of individuals was not determined. It is possible that very young turtles may be more difficult to spot than larger sea turtles. However, neritic and oceanic stage juveniles can range from 41 cm (1.3 ft. straight carapace length) up to (82 cm to 100 cm (2.7 to 3.3 ft. straight carapace length) (Turtle Expert Working Group 2009). Many juveniles are large enough to be detected by aerial surveys under most flight conditions in which surveys occur. Although juveniles are represented in density estimates, the number of juveniles cannot be parsed out since only overall estimates for all age classes are available. Therefore, juveniles are not explicitly excluded from the survey data or from the density estimates. However, the information available shows that these small turtles are unlikely to occur in the Project area. Although older juveniles could possibly occur, it is also possible that older juveniles occur more frequently in the shallower, neritic habitat offshore Massachusetts and Rhode Island. Recent survey efforts do not suggest juveniles are common in the deeper, offshore Project area. Lastly, it is noted that the presence of any size or age class of sea turtles in the Project area will be limited mainly to summer and fall months due to seasonal habitat use whereby sea turtles use warmer water habitats in the winter months (DoN 2017; Dodge et al. 2014; Hawkes et al. 2007). This is confirmed by Krause et al. (2016) that reported sighting rates of all sea turtles combined were high in summer and autumn, zero in winter, and nearly zero in spring. Section 3.5.2 of the FEIS has been updated to include a discussion of behavioral responses of individual sea turtles as a result of pile driving.
0248-126	It is not clear how the discussion of the risk of vessel strike considers the operation of vessels outside the immediate project area and the transit routes to the primary ports to be used for crew transport. For example, it does not appear that the vessel strike assessment considers the vessels that are anticipated to travel to the project area from ports in Canada. This assessment also does not appear to consider how any anticipated shifts in baseline (i.e., non-project) vessel traffic due to the construction and operation of the project may alter the risk of vessel strike to sea turtles. We note your statement that the use of AIS on all project vessels would decrease the potential for vessel strikes against sea turtles; it is not clear to us how that decreased risk is achieved through the use of AIS.	Section 3.3.8.3 of the DEIS included a discussion for construction and installation effects on sea turtles, specifically potential for vessel strikes to sea turtles. Therefore, no changed to the FEIS is warranted. Further discussion of sea turtle occurrence and potential impacts, including vessel strike, are provided in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ .
0248-127	You conclude that the “reef effect” would be beneficial for sea turtles; however, there is no analysis about how any increase in fishing activity associated with the	Section 3.5.2 of the FEIS has been updated to address “reef effect” and its effect on fishing activity and has clarified that because impacts on foraging habitat are likely neutral, insignificant, or beneficial to sea turtles, mostly temporary and

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	“reef effect” may increase the risk of interactions between sea turtles and fishing activity.	localized, impacts from habitat disturbance would be negligible for sea turtles. Further discussion of sea turtle occurrence and potential impacts are provided in the Biological Assessment submitted to NOAA, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ .
0248-128	In the section on Potential Variances in Impacts (beginning on p 3-121) there is a need to be circumspect about the magnitude of impacts on regional economies. The Borges et al. 2017 study appears to be based on an Input/Output model. Depending on regional purchasing coefficients embedded in these models, even purchases from local vendors may have relatively low impact. This section suggests that a significant amount of labor will not come from labor in the study area and most materials will not be manufactured in the study area.	Input-output models such as IMPLAN (the basis of the Borges study) are a widely accepted method for estimating a project’s economic impact, and are frequently used to estimate economic impacts for NEPA studies. Changes in coefficients can result in substantial differences in model outputs; however, the coefficients in the Borges study were customized for this Project, based on expert opinion and applicable literature. Absent other generally accepted studies that significantly differ from or call into question the Borges study, no changes were made to the FEIS as a result of this comment.
0248-129	This section provides analysis and results based only on the Vineyard Wind activities. The DEIS lacks any comprehensive analysis of the positive effects of job creation of the proposed action and any positive or negative impacts of other activities such as recreational and commercial fisheries.	Section 3.4.1.2 of the DEIS analyzed economic impacts, including job creation. The FEIS has been updated to include information for ocean economy employment data and additional explanation of Vineyard Wind job generation figures. Impacts on recreation, including recreational fishing, are evaluated in Section 3.9 of the FEIS. Impacts on the commercial fishing industry are evaluated in Section 3.10. These impacts are restated and linked to employment and other economic impacts in relevant portions of Section 3.6.1.
0248-130	The DEIS states that members of environmental justice communities who rely on offshore fishing for subsistence may also experience minor benefits (page 3-133); however the Vineyard Wind site is located a considerable distance from shore and any subsistence benefits will likely be limited to people that have a boat of sufficient size to access the area, which is likely to be above the means of members of environmental justice communities. It is not clear if this section is a reference to vessel owners, crew or processing employees, etc.	Based on this comment, Section 3.6.2 of the FEIS has been revised to remove the reference to benefits.
0248-131	We are concerned that in this section (p 3-151) and elsewhere in the DEIS, the potential navigational hazards, particularly for vessels under sail and in poor weather or visibility conditions, appear to be trivialized. While the likelihood of a crash into WTGs may be low, the consequence may be catastrophic and should be considered in the document.	Section 3.11.1 of the FEIS has been revised to provide additional information on navigational hazards, including the potential risk for and consequences of collisions.
0248-132	Throughout this section, different and often conflicting estimates of fishery landing values are presented. The FEIS should more accurately characterize the value of each fishery using the same metric. The sources of fisheries revenue data cited in the document were generated using different methods, and therefore cannot always be directly compared. The document should clearly explain why estimates differ when these different sources are used. For example, Table 3.4.5-7A depicts fishery values from the WDA based on a personal communication	The revised Section 3.10.1 (Massachusetts Wind Energy Area and Vineyard Wind Lease Area) of the FEIS explains the difference between the VMS and VTR data, and data limitations. Tables 3.4.5-2, 3.4.5-4, 3.4.5-5, and 3.4.5-6 were removed.

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	with Geret DePiper, while Table 3.4.5-6 shows different fishery values for the lease area based on Livermore 2017.	
0248-133	Tables and figures should clearly indicate if the pounds are landed or live-weight, and if revenue is in nominal or real dollars. Throughout the DEIS, please clarify how the stated values have been adjusted for inflation. In the first table in the section (Table 3.4.5-1), 2016 dollars are used; please clarify if that is the standard throughout the document.	The suggested clarification has been made in the FEIS.
0248-134	For Figure 3.4.5-1, provide justification for clipping the top 5 percent of revenue - in doing so you are removing the highest-value revenue areas. While these earnings may not be ‘average,’ they are real. If the concern is about the skewing the appearance of revenue values, instead of truncating the data you can re-bin the color ramp values.	BOEM maintains that clipping the top 5 percent of revenue is appropriate in this case. Clipping the top 5 percent of revenue lessens the high-value scallop revenue skew of the regional revenue. Without clipping, the top 5 percent areas important to lesser value fisheries would not appear. Removing the top 5 percent would not remove any areas that are not already represented in the far end of the color ramp. No change to the FEIS is warranted.
0248-135	All tables and figures in this section should be updated to include landings from the most recently available information. During 2016, fishing activity within and around the WDA increased dramatically due to the abundance of longfin squid. The FEIS should include squid landings through at least 2016 to more accurately depict the likely fishing activity and revenues to be expected throughout the duration of the proposed project. For example, if higher 2016 revenues would be included in Table 3.4.5-5, the average share of total revenue harvested from the MA WEA would be higher. Without the most recent data, it is not accurate to claim that this data represents the best available science for characterizing commercial fishing in the proposed Project Area, as suggested on page 3-163.	Section 3.10.1 of the FEIS (Massachusetts Wind Energy Area and Vineyard Wind Lease Area) now includes the most current available information, using both VMS and VTR data sources. Figures were similarly updated to include current data in the analysis. The updated information includes that for the squid fishery.
0248-136	Similarly, relying on an analysis of recreational trips through 2012 from the Kirkpatrick et al, 2017 report is inadequate and should be updated in the FEIS.	Information presented on for hire recreational fishing relied primarily on data from up to 2012 as being the most current information that was readily available for the assessment. No change since DEIS.
0248-137	We recommend using a shapefile with a projection matched to the projection of the revenue raster.	The suggested edit has been made in the FEIS.
0248-138	Consistent references to the Northeast Fisheries Science Center should be used throughout the document. In some instances, it is referenced as NEFSC, but in others the acronym NFSC is used instead (p 3-161, 3-162, 3-174).	The FEIS has been updated to provide a consistent reference to and acronym for the Northeast Fisheries Science Center.
0248-139	On page 3-161 and for Table 3.4.5-2, insert an explanation why revenues within the WDA represent a small fraction of the annual fishing revenues in some ports by noting that revenues in ports such as New Bedford are dominated by high-value Atlantic sea scallop landings that mask the importance of other species landed in this port.	This table and the associated text have been deleted, and the suggested revisions are no longer pertinent. Additional data has been provided on revenue and landings by port from catch within the WDA based on VTR data, which is utilized in the assessment in Section 3.10 of the FEIS.
0248-140	Table 3.4.5-3 appears to substantially underestimate port landings in 2016, especially when compared to FMP-specific landing revenues depicted from the same source in Table 3.4.5-6. Without fully exploring methodological	Section 3.10.1 of the FEIS (Massachusetts Wind Energy Area and Vineyard Wind Lease Area) now explains the difference between the VMS and VTR data,

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	differences, this table conflicts with NMFS landing data indicating 2016 landings were much higher than previous years based primarily on very high longfin squid landings from this area (see Attachment B). Using inaccurately low landings and revenues reduces the importance of the area to the fishery when describing conditions and trends in later sections such as on page 3-176. Updated NMFS data from 2016 should be included in the FEIS whenever data describing fishery value and trends are discussed.	and data limitations, and additional information and data has been included in FEIS Section 3.10 to support the analysis.
0248-141	We recommend that you confirm the 2011 Bottom Trawl revenue value stated in Table 3.4.5-4.	Table has been removed.
0248-142	In table 3.4.5-5, please clarify the column labels. It should be made clear how the share of total revenue harvested from the MA WEA for each FMP is being calculated - this information is not included. In regards to the table, which states that 0.0% share of total sea scallop revenue harvested from MA WEA, please clarify if this data had the top 5% clipped, as described in Figure 3.4.5-1.	Table has been removed.
0248-143	The text (p 3-163) describing sea scallop FMP landings values in Table 3.4.5-6 should be corrected to state the indicated peak scallop years were in 2011 and 2014, as it incorrectly states the peak years were 2011 and 2015.	Table has been removed.
0248-144	It should be clarified that the \$280,000 of lobster pot gear revenue from the MA WEA, referenced from Kirkpatrick (et al. 2017) is based on 2007-2012 data, and was stated in USD\$2015.	The suggested clarification has been made in the FEIS.
0248-145	On page 3-163, the second paragraph states “Comparison of VMS data in 2015-2016 shows intensive use of the area for squid fishing (Figure 3.4.5-2). That is not an accurate description of the data. The data used for Figure 3.4.5-2 do not indicate squid fishing intensity, but rather the relative squid fishing vessel intensity during the year 2015-2016. VMS data show vessel presence, but do not indicate whether the vessel is fishing or not. This should be clearly indicated in the text, figure caption, and map legend. It has become a standard practice to “speed filter” VMS data so that maps better indicate likely fishing activity. Both speed-filtered and unfiltered VMS data are available from the Northeast Ocean Data portal for most fisheries. This figure should be created using the speed-filtered VMS data, which indicates vessels traveling at speeds less than four knots, which would more accurately depict squid fishing activity.	The text has been updated to show the relative squid fishing vessel density during the year 2015 to 2016 using VMS. As previously noted, VMS as a source of location data for the squid fishery may underrepresent fishing activity prior to 2017. Also, VMS data show vessel presence, but do not indicate whether the vessel is fishing or not. Revised figures representing these data have also been added to the FEIS, including figures showing both speed filtered and non-filtered data.
0248-146	We recommend that you revise Figure 3.4.5-3 because it is confusing. It appears that the purple trend line shows percentages, despite the legend indicating the purple line is the total revenue value.	The figure has been updated for added clarification.
0248-147	Please clarify the source of the “expanded data set” used here; previous references to (G. DePiper, personal communication, August 2016) were for a data set from 2007 to 2015.	This reference citation has been corrected.

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0248-148	For describing Figure 3.4.5-3, we recommend the following wording for the last sentence in the “Wind Development Area” section’s first paragraph (p3-165): “Looking at the value of catch within the WDA for each FMP as a percentage of the total revenue for each FMP in the region, the largest absolute shares occur in the northeast multispecies (small mesh) and mackerel/squid/butterfish FMPs, but in each case, less than 0.5% of the FMP’s total revenue is harvested within the WDA.”	The suggested edit has been made in the FEIS.
0248-149	Regarding Figure 3.4.5-4, you should note that lobster pot landings may be underestimated due to incomplete reporting for trap vessels that are not subject to mandatory reporting. We also suggest moving Figure 3.4.5-4 to earlier in the text, as it seems somewhat out of place in its current location.	The suggested edits have been made in the FEIS.
0248-150	In Table 3.4.5-6, you should note that Small Mesh Multispecies is not its own FMP. Small Mesh Multispecies are still regulated under the Northeast Multispecies FMP. Also note that Atlantic Halibut are regulated under the Northeast Multispecies FMP and can be included with totals for that FMP.	Section 3.10.1 of the FEIS (Massachusetts Wind Energy Area and Vineyard Wind Lease Area) now explains the difference between the VMS and VTR data, and data limitations, and additional information and data has been included in FEIS Section 3.10 to support the analysis.
0248-151	For Table 3.4.5-7a, clarify if the values are in real or nominal dollars.	The suggested clarification has been made in the FEIS.
0248-152	For Table 3.4.5-7b, clarify the table title. This is supposed to be the percentage of each FMP’s revenue from landings within the WDA compared to each FMP’s total revenue from landings in the entire region, but that is not clear as written.	The suggested clarification has been made in the FEIS.
0248-153	On page 3-168, we suggest using the following wording for the last sentence of the first paragraph: “Between 2007 and 2017, annual revenue from landings of summer, scup, and black sea bass in the WDA ranged from less than \$4,000 to approximately \$90,000.”	The suggested edit has been made in the FEIS.
0248-154	On page 3-168, we recommend directing the reader more specifically to Table 3.4.5-7a for revenue values by year for each FMP. Please also clarify why the text highlights revenue ranging from \$100-300,000 from the Atlantic Mackerel, Squid, Butterfish FMP, as it is not clear what is referenced with this range. The year noted for the peak revenue (\$932,616) is incorrectly written as 2017, while the table indicates the peak year was 2016.	The text of the FEIS has been updated for clarification.
0248-155	Discuss trends in revenue for the sea scallop FMP, given the discussion of revenue trends for the other FMPs that are included in this section.	Additional text has been added to discuss trends in revenue for the sea scallop FMP, including additional data in Section 3.10 of the FEIS.
0248-156	In the text describing fishing activity under the Surfclam and Ocean Quahog FMP (p 3-168), the text should be revised to state: “VMS data indicates that surfclam/ocean quahog are not typically targeted...” because fishing vessels are not targeting VMS data.	The suggested edit has been made in the FEIS.
0248-157	As noted previously for VMS data used in Figure 3.4.5-2, the maps in Figures 3.4.5-5 and 3.4.5- 6 should include the explanation that the data represents fishing vessel intensity and not fishing activity or fishing revenue. These figures all should use data that is speed-filtered to show fishing vessel presence when	The description of the affected environment for commercial fisheries has been substantially updated using the most current available data from key sources, including both VTR and VMS data. Considerable additional information has

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	vessels are travelling at less than 4 knots, which means they are more likely to be fishing. The maps look very different when built with speed-filtered data. If there is a reason the maps are using data that has not been filtered by speed, that point should be clearly noted in the text.	been provided to give a comprehensive profile of fishing activities. The figures have been update to show both speed filtered and non-filtered data.
0248-158	The discussion of federal fisheries affected by the offshore export cable corridor relies upon fishing activity covered by VMS. However, many of the potentially affected fisheries, including the whiting, summer flounder, scup, and black sea bass are not required to use VMS. Therefore, these fisheries are underrepresented in evaluations of impacts from the cable corridor. The FEIS should note that point, and evaluate the potential impacts to these fisheries.	VMS data have been considered by reviewing aggregated VMS data presented in Vineyard Wind’s Supplemental Navigation Risk Assessment as well as information provided by NMFS. The FEIS has been updated to include the new, best available information for assessment purposes.
0248-159	The text on page 3-174 seems like an appropriate place to reference what is currently labeled as Figure 3.4.5-4, Lobster Pot Landings 2001-2010. We recommend updating this figure to include more recent years.	The lobster pot figure (now Figure 3.10-3) has not been updated to more current data. No change since DEIS.
0248-160	In the second sentence of the last paragraph on page 3-174, we suggest rephrasing the text to say: “Table 3.4.5-8 shows the average annual number of for-hire recreational boat trips by port group based on....”	The suggested edit has been made in the FEIS.
0248-161	On page 3-176, we suggest changing the third sentence in the second paragraph to read: “In general based on catch data for the last decade, the total annual revenue from landings within the WDA usually varied from \$200,000 to \$550,000, but peaked in 2016 at a high of \$1.2 million.”	The suggested edit has been made in the FEIS.
0248-162	In regards to the second “Aspects of Resource Potentially Affected” beginning on page 3-176, there is no mention of the potential increase in risk for fishermen mortality or morbidity, or to the possibility of increased collisions; nor regarding displaced fishermen being forced to fish in less familiar waters, coping with gear issues that might arise, etc. The only mention of collision risk is in the context of a risk of an oil spill or discharge. The FEIS should include at least a qualitative discussion of and any empirical information on accidents, deaths, and injuries for commercial fishing due to adaptation to restrictions imposed by construction and operation of wind farms.	Section 3.11.1 of the FEIS has been revised to provide additional information on navigational hazards, including the potential risk for and consequences of collisions. The Supplemental Navigational Risk Assessment, which BOEM reviewed and incorporated by reference into the FEIS, also provides additional detail to support the information added to the document.
0248-163	Although the text describes the “displacement” of fishing vessels as leading to increased conflict over other fishing grounds, the potential loss of activity of fishing vessels (and thus lost harvest revenue) should be considered if the displaced fishing vessels do not opt to or cannot fish in alternative fishing grounds. This would also apply to the operations and maintenance phase.	Section 3.10.2 of the FEIS has been revised to include additional discussion of displaced vessels. Fishing in the WDA will continue and not all vessels will be displaced. For the displaced vessels, it is impossible to determine the alternative fishing locations as that will depend on individual choices. Section 3.11.2 of the FEIS has been revised to further describe navigational impacts on fishing vessels within the WDA.
0248-164	There is evidence in the literature that shows fishermen do not always adapt to changing conditions by going to their next best alternative location. Therefore, economic loss in one area cannot always be compensated by revenue gains in another area.	Section 3.10 of the FEIS has been updated to include a discussion on maneuverability and access by fisherman. While Vineyard Wind’s supplemental navigational risk assessment shows that it is technically feasible to navigate and maneuver fishing vessels and mobile gear through the WDA, BOEM is cognizant

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		that maneuverability within the WDA may vary depending on the fishing gear used by a particular vessel. In addition, BOEM is aware that even when feasible to fish within the WDA, some fishermen might still not consider it safe to do so. However, BOEM also expects that, with time, most fishermen would adapt to WTGs spacing and would be able to fish successfully in the WDA. In addition, through the RI agreement, Vineyard Wind would support widespread deployment of navigational equipment, improvements in fishing vessels and gear, purchase of updated safety equipment such as radar, GPS, emergency position-indicating radio beacons, and similar.
0248-165	We suggest changing Figure 3.4.5-11 title to read “Popular Recreational Fishing Spots”	The suggested edit has been made in the FEIS.
0248-166	Any additional mitigations that Vineyard Wind may offer as part of current or future negotiations with industry (page 3-178), whether in the form of compensation funds or otherwise, must be documented in the FEIS if either Vineyard Wind or BOEM intend to use such mitigations to offset anticipated impacts of the proposed action.	Section 3.10 and Appendix D of the FEIS have been revised to include the Vineyard Wind’s voluntary established gear loss and revenue compensation funds for fishing interests based in Rhode Island, Massachusetts, and other states. Please see Section 3.10 and Appendix D of the FEIS for more details on the measures.
0248-167	We have concerns that the analysis in this section [Section 3.4.5.3] is not adequate and does not provide sufficient support for conclusions related to the scale of impacts. The analysis should provide meaningful estimates of the economic impact to all federally managed fisheries impacted directly, indirectly, and cumulatively by the project. The DEIS provides overall general estimates of trip revenue with no analysis of impacts on individual fisheries. Moreover, at the bottom of page 3-180, the DEIS indicates that impacts to individual fishermen heavily dependent upon fishing within the WDA may be moderate to major, but mitigation through construction disruption payments would reduce those impacts to minor. However, the document provides no detail on the mitigation proposal or analysis of how mitigation packages would be sufficient to reduce impacts to minor. The DEIS suggests that compensation would be directly negotiated between the lessee and impacted fishermen, making it unlikely that additional detail about the nature of the impacts to such vessels and the degree of compensation would be available in the FEIS. As a result, the suggestion that impacts could be reduced to minor cannot be supported.	Analysis in Section 3.10.2 (formerly 3.4.5.3) of the FEIS has been revised to include additional quantitative and qualitative information to support effects assessment in that section, as well as the assessment of alternatives. Section 3.10.2 of the FEIS has been also revised to discuss potential mitigation measures and compensation plans. Appendix D of the FEIS has also been updated to include additional details on the mitigation measures and compensation plans.
0248-168	At the top of page 3-179, we recommend recognizing that some fishermen may not adapt by choosing or finding alternative fishing locations. It cannot be assumed that all fishermen will, particularly if those alternative locations are unfamiliar or necessitate significant gear changes.	Section 3.10.2 of the FEIS has been revised to indicate that vessels may opt not to or may not be able to fish in alternative fishing grounds and may thus exit the fishery. Section 3.10 of the FEIS has been updated to include a discussion on maneuverability and access by fisherman. While Vineyard Wind’s supplemental navigational risk assessment shows that it is technically feasible to navigate and maneuver fishing vessels and mobile gear through the WDA, BOEM is cognizant that maneuverability within the WDA may vary depending on the fishing gear

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		used by a particular vessel. In addition, BOEM is aware that even when feasible to fish within the WDA, some fishermen might still not consider it safe to do so. However, BOEM also expects that, with time, most fishermen would adapt to WTGs spacing and would be able to fish successfully in the WDA. In addition, through the RI Agreement, Vineyard Wind would support widespread deployment of navigational equipment, improvements in fishing vessels and gear, purchase of updated safety equipment such as radar, GPS, emergency position-indicating radio beacons, and similar.
0248-169	On page 3-179, in Navigation - Port Impacts, the analysis should consider the available fishing infrastructure (supplies, repairs, etc.) at smaller ports, which this has likely declined in recent years. While a marine coordination center may reduce impacts associated with potential vessel collision and allision, the analysis in this section does not address potential competition for dock services and supplies or increased demands for services.	<p>Section 3.6 of the FEIS includes an updated discussion of the Project’s impacts on local communities and businesses, and acknowledges the possibility that the Proposed Action could temporarily compete with the commercial fishing industry for marine workers during construction. The DEIS and FEIS also address the increased job demands associated with the proposed Project could result in a temporary, irretrievable loss of workers available for other construction projects, leading to an influx of workers from other areas or deferral of development projects. Likewise, while some WTG components would be unique to WTGs, the demand for more general construction-related supplies and services to support the Proposed Action could result in a temporary loss of available services and supplies for other development projects.</p> <p>Section 3.10 of the FEIS has been revised to include an expanded discussion of the Project’s impacts on commercial fisheries. Section A.8.6 in Appendix A of the FEIS has been revised to provide additional analysis of impacts on infrastructure and other land uses. Section 3.11.2 of the FEIS has been revised to include an expanded discussion of navigational risks for vessels within the WDA as well as impacts on vessel traffic to ports.</p>
0248-170	More recent data than the 2012 data referenced in Kirkpatrick et al. 2017 should be used to characterize revenue in the pot and gillnet fisheries in this section.	The description of the affected environment for commercial fisheries has been substantially updated using the most current available data from key sources, in most cases to 2017, including for gillnet and pot fisheries.
0248-171	The document suggests that seasonal restrictions on construction activities would not benefit squid eggs; however, the statement is not supported. Although fishing effort does occur during spawning season, this analysis does not specifically address potential impacts of the project on squid eggs or spawning activity (i.e. acoustics, sedimentation, abrasion, etc.). We would expect both squid spawning activity and eggs/larvae may be disrupted or harmed beyond that which normally occurs with existing fishing activities. The statements on page 3-181, related to impacts to the resource and associated economic impacts to the fishing industry are not supported by the analysis.	Section 3.3.2 of the FEIS includes a summary discussion of construction-related effects to finfish, invertebrates, and EFH. Further details regarding these impacts are provided in the EFH Assessment, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents .

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0248-172	On page 3-182, please clarify if there are 256 crew transfer vessel trips estimated per year; the same for the 110 multipurpose trip vessels and 26 service operation vessels.	Section 3.11 of the FEIS has been revised to clarify the number of vessel trips.
0248-173	On page 3-182, in the first paragraph in the “Disruption of Fishing in the WDA/OECC” section, we recommend clarifying why BOEM anticipates moderate impacts on commercial fisheries, “in particular trawlers.” In assessing impacts to fishing operations, the FEIS should include a discussion of decisions BOEM has made that affect impacts such as potential COP conditions requiring cable burial at a minimum of 6.5 feet (page. 3-182), rather than speculate that BOEM could make those decisions and influence expected impacts.	The discussion of mitigation has been modified to be clear on the description of the various mitigation measures and their resulting changes on the impacts on commercial fisheries. “Could” is retained to describe what mitigation may include, where appropriate, to reflect the fact that the specific set of conditions that will be attached to Project approval have yet to be determined.
0248-174	The DEIS states that the addition of hard bottom structures in the WDA could partially offset the adverse impacts of the loss of access to fish on sandy or soft bottoms (bottom of page 3-182); however, the document does not provide any economic analysis or details related to any potential offset of impacts. As noted in the document, the fish species that are impacted by altered habitat (due to the addition of hard bottom structures) would be different. In turn, the vessels that target these species are likely to be different, resulting in either positive or negative economic impacts to individual vessels and associated fishing communities based on the whether the habitat used by species targeted by those vessels increases or decreases. However, this section does not provide any evidence to support the claim that a beneficial impact to hard-bottom fish populations will offset adverse impacts to sandy-habitat fish populations. It is also not clear if the section is referring to biological or economic impacts.	The revised FEIS Section 3.10.2 has clarified the subject by removing the language related to offset of impacts and by referring to Section 3.3.2. Additional text has been added about uncertainties of resulting impacts with respect to increases in hard bottom structures, with respect to artificial reef effects - specifically: “With respect to gear type, hard cover could displace historic bottom trawl and gillnet fisheries by reducing fishable surface area, and by increasing recreational hook and line activity in the vicinity of turbines. The conversion of soft sediment habitat to hard bottom via protective cover could also negatively impact the bottom trawl industry by increasing the risk of net hangs and vessel instability, and in general decreasing trawlable habitat.”
0248-175	On page 3-183, while the stated purpose is to estimate the impact of longer trips to steam around the WDA, the section does not attempt to estimate these costs. The text states that “fishing vessels traveling to more distant fishing locations would incur additional expenses if fishing within the WDA is no longer an option...Depending on fishing locations, the total trip time and catch revenue, the additional fuel costs associated with transit around the WDA could have a substantial impact on fisheries profits”; however, there is no analysis of the potential impact on fisheries and fishing communities. This analysis is necessary to support the conclusion related to the anticipated moderate effects on commercial fisheries and for-hire recreational fisheries.	Actual impacts on fishing vessels are expected to vary, for the reasons quoted in the comment, and a difficult to predict with specificity. Section 3.10.2 of the FEIS has been revised to provide updated information on the assessment of impacts on fisheries and fishing locations. Section 3.11.2 of the FEIS includes additional discussion of risks for vessels within the WDA as well as impacts on vessel traffic to ports.
0248-176	We recommend rephrasing the sixth sentence in the first paragraph to read: “The average trip (or operating) cost for a single-day trip. . . .” In the third-to-last sentence in that paragraph, we recommend removing the word “total” from “the total average cost is highest for fuel. . . .” given it is referring to components of total trip costs, which are components of total costs. We also suggest explicitly	The suggested edits have been made in the FEIS.

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	noting in this section (page 3-183) that it is possible some fishermen may reduce their number of trips or become inactive if they cannot cover their trip costs.	
0248-177	We recommend that you revisit your choice of language on page 3-183, in describing the impacts on families as a “non-market” impact. In the context of cultural impacts, this is not an accurate of the term. There is insufficient analysis and discussion of these potential impacts on fishing communities. The DEIS should address both the potential social and economic impacts of the proposed action and alternatives, such as the impacts of increased time away from home and family and economic uncertainty.	The purpose of Section 3.10.2 of the FEIS is to assess impacts of the Proposed Action on commercial and for-hire recreational fishing. Section 3.6.2 of the FEIS discusses the broader social impacts of changes to the commercial fishing industry. This reference has been added to the revised FEIS Section 3.10.2. Impacts on families as a result of longer fishing trips are acknowledged, however, they fall outside the scope of this assessment. No change since DEIS is warranted.
0248-178	On page 3-184, the last sentence at the end of the first paragraph speaks to the risk to fishermen safety - the possibility of death or injury - and damage to the vessel. A technical assessment (“objective” measure of risk) is an important consideration; however, we suggest considering the fact that a seasoned fisherman is more likely to go with their subjective perceptions of risk. It should be noted here that it is possible some fishermen may opt to stop fishing entirely, as they may not be willing to incur the possible safety and financial risks associated with seeking out alternative locations. It should also be noted that choosing an alternative location may increase risk to fishermen.	The suggested edits have been made in the FEIS.
0248-179	The statement that suggests mitigation measures will serve to reduce impacts from “moderate to major” to “minor to moderate” cannot be supported as these mitigation measures have not been identified or analyzed in the document.	Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. Additional mitigation and monitoring measures may arise from consultations and coordination with Federal and State resource agencies. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0248-180	We are also concerned about how the concept of mitigating negative impacts to fishermen is described in the DEIS. Compensation for negative impacts and mitigation of negative impacts are not quite the same thing. Fishermen have value for fishing that goes beyond expected profit; for many, it is an identity and source of social capital. Fishermen often gain utility from being able to fish in locations that are known to them and also fished by their peers - the presence of other boats in the area can contribute to the fishermen’s sense of safety. Mitigation or minimization of such impacts are not discussed in the DEIS, but are important components of impacts to the fishing industry that should not be ignored in the FEIS.	The comment has been acknowledged in the FEIS.
0248-181	In the last sentence on page 3-184, the number of maintenance vessel trips each year should be clarified, as noted previously. The text currently suggests the use of almost 400 vessels.	Section 3.11 of the FEIS has been revised to clarify the number of vessel trips.
0248-182	Reference to a regional monitoring initiative for fishery impacts as noted on page 3-186 should be updated to reflect the recent developments of fishing industry and wind developer plans to collaborate on that subject.	Regional monitoring is not being proposed as part of the proposed Project or as a condition of COP approval.

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0248-183	We recommend that you clarify why for-hire fishing would have more flexibility for use of the WDA during construction and installation [Alternative A]. Although these vessels may be able to fish in the area, construction noise will likely cause fish to leave the area. This statement suggests that recreational fishing vessels will experience less intense impacts of construction activity because of smaller and more maneuverable vessels, but does not seem to recognize the potential impact on target recreational species.	Revisions to 3.10.2 of the FEIS state: “For-hire fishing boats are typically smaller compared to commercial fishing boats, which improves their maneuverability, however, construction traffic, and noise can cause fish to leave the area. Therefore, it is expected, that for-hire fishing would have more flexibility for use of the area during construction and installation. There is the potential, however, or behavioral impact on target recreational species as described above (Michael Pierdinock, Pers. Comm., September 19, 2018; FAO 2018).”
0248-184	This section [Section 3.4.5.5] states that scallop and surfclam/ocean quahog concentrations vary from year to year, and concludes that therefore the benefits of access to this area also vary each year (through the Alternative C shifting WTG locations south). This section should provide data to support this statement and explain why concentrations may vary each year, (e.g. management, stock availability, etc.).	The large inter-annual variation in scallop and surfclam/ocean quahog harvests within the WDA is evident in the revised Section 3.10.1 (formerly 3.4.5.1) of the FEIS, and shown on Figures 3.10-5 and 3.10-6 of the FEIS. This data demonstrates the spatial variability of the fishery in response to exogenous changes. The reasons behind this variability are undoubtedly complex and multifaceted; moreover, a full description of it is beyond the scope of the assessment and not required to support the conclusions.
0248-185	In addition, this section [Section 3.4.5.5] does not discuss other fisheries that are active in this area such as the longfin inshore squid fishery. This section does not provide a complete analysis on how moving WTGs further south within the WDA will impact fishery resources and commercial fisheries that target those resources.	Section 3.10.3 (formerly 3.4.5.5) of the FEIS now acknowledges that the locations of squid concentrations also vary from year to year. The affected environment is described in revisions to Sections 3.10.1 and 3.10.2 of the FEIS. Fisheries existing in the WDA, including fisheries in the south of the WDA, are discussed in Section 3.10.1 of the FEIS and impacts on those fisheries are assessed in Section 3.10.2 of the FEIS. Under Alternative C, discussed in Section 3.10.3 of the FEIS, the acreage of the WDA would remain unchanged and all WTGs and ESPs would be sited within the same sized footprint as under the Proposed Action. Therefore, additional discussion on fisheries in Section 3.10.3 would not provide any new information.
0248-186	The DEIS concludes that mitigation for Alternative D1 will reduce scale of impacts (from the range “moderate to major” down to “minor to moderate”); however, detailed mitigation plans have not been identified or analyzed. It is not clear from the analysis how impacts would be reduced.	Section 3.10 of the FEIS has been updated to include details of mitigation and monitoring measures relative to commercial fisheries, including voluntary financial compensation. Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0248-187	The DEIS does not provide sufficient discussion regarding an east-west orientation of the WTGs. The text notes that Rhode Island-based commercial fisheries groups and the Rhode Island Coastal Resources Management Council have asserted that the east-west layout would improve maritime navigation and facilitate continued fishing operations and practices, compared to the Proposed Action. However, the DEIS does not provide or evaluate the Automatic Identification System (AIS) and vessel monitoring system (VMS) data that show clear patterns of east-west orientation of fishing activity throughout much of the lease area. An east-west orientation would align the orientation of the WTGs with	The revised FEIS Section 3.10 clarifies that vessels fishing east-west may not experience significant benefit of an east-west turbine layout if the Vineyard Wind facility does not align with the Bay State Wind facility. The east-west orientation may not benefit a majority of vessels that fish or transit (RODA comment letter, comment 149-005). The current analysis uses the best available data and is appropriate. As stated previously, the AIS data, VMS density maps, and other data sources cited throughout Section 3.11 comprise the best publicly available data for vessel transportation in the study area. Due to a lack of trip-level data, the uncertainties involved in a directional analysis of revenue exposure would make

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	the predominant direction of fishing activities, increasing the ability of many commercial fishing vessels to continue operating in the wind development area (WDA). While it may not eliminate all impacts, we would expect this orientation to minimize impacts of lost revenue associated with reduced access to the WDA.	such additional analysis not defensible. To address the lack of trip-level data, the analysis of revenue exposure presented in the FEIS provides a conservative estimate of potential impacts on commercial fisheries. Additional information has been included from analyzing the AIS, VMS, and submitted chart plotter images provided to the agencies. From this information, it is apparent that a general pattern of northeast-southwest or east-west fishing activity occurs in the WDA. This information is utilized in the effects assessment.
0248-188	This section also fails to discuss that an east-west orientation would be consistent with the intended layout of adjacent wind projects and potential future construction in the Vineyard Wind lease area. These foreseeable future project should be considered in an analysis how the different alternative spacing and layout may impact navigation and safety of fishing vessels. The analysis of Alternative D2 does not provide sufficient information to support the conclusion that the scale of impacts would be the same as the Proposed Action.	Section 3.10.4 of the FEIS has been updated to include additional information on fishing within the WDA. Section 3.10 of the FEIS has also been revised to provide additional information related to the use of the Project area by vessels and project layout. Section 3.11.4 of the FEIS acknowledges that Alternative D2 would establish a WTG layout consistent with proposed projects discussed in Appendix A. Section 2.5 of the FEIS has been included to identify the agency-preferred alternative.
0248-189	This comparison on alternatives is very limited [Section 3.4.5.10]. As indicated in the previous comments, the DEIS suggests Alternative D2 would have the same impacts as the proposed action. However, the analysis does not provide information that would help support this conclusion. In addition, this section suggests impacts would be reduced with mitigation, but does not describe or evaluate the mitigation measures proposed.	Section 3.10.7 (formerly 3.4.5.10) of the FEIS has been revised to address this comment. The FEIS specifies what the potential impacts would be with and without mitigation measures applied. In addition, Appendix D of the FEIS provides a summary of how each mitigation or monitoring measure would reduce potential impacts.
0248-190	The second-to-last sentence of the paragraph in this section states that overall net benefits of the alternatives are limited; however, this analysis does not measure net benefits of each alternative.	Section 3.10 of the FEIS has been revised to focus the discussion on benefits rather than net benefits.
0248-191	In the second paragraph on page 3-194, we suggest rephrasing the text to read: “All of the above activities and events can cumulatively reduce the availability of fish stock to commercial fisheries and for-hire recreational fisheries, or increase the costs of fishing, which may decrease the volume of landed catch and fishing revenues, leading to decreased profits.” Note that this assumes the price of fish remains constant.	The suggested edits have been made in the FEIS.
0248-192	As presented in a vessel transit workshop hosted by RODA, when presented on an annual scale, commercial fishing vessel operation patterns are masked by the higher transit volume of other vessels, including tankers and other commercial traffic, transiting the area to different locations. Only when examining the data on a finer scale are more definitive operation patterns evident.	Section 3.11.1 of the FEIS has been revised to include additional data on current vessel traffic in the WDA.
0248-193	The FEIS should include a more thorough evaluation of seasonal patterns or utilize different filters to avoid obscuring commercial and recreational fishing vessel transit patterns.	Section 3.4.7.1 of the DEIS discussed seasonal vessel traffic patterns; therefore, no changes were necessary in the FEIS.
0248-194	Many commercial and recreational fishing vessels do not use AIS. Therefore, AIS data likely underestimates fishing-related vessel traffic. Using VMS data can	VMS data have been considered by reviewing aggregated VMS data presented in Vineyard Wind’s Supplemental Navigation Risk Assessment as well as

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	provide greater insight into commercial fishing traffic for most federally managed fisheries, but is also not fully representative of vessel activity. The FEIS should consider integrating an assessment of VMS data to characterize commercial fishing vessel traffic patterns in the WDA.	information provided by NMFS. The FEIS has been updated to include the new, best available information for assessment purposes.
0248-195	Although Alternatives D1 and D2 may not change the impact category for vessel traffic, the impacts on commercial fishing vessel traffic are not the same as the proposed action. As noted on page 3-212, Alternatives D1 and D2 would decrease impacts on commercial fishing vessel traffic compared to the proposed action. The conclusion of this section should be revised to reflect this.	Sections 3.10.7 and 3.11.6 of the FEIS have been updated to include additional information on D1 and D2.
0248-196	The DEIS does not provide evidence to support the statement that the cumulative impacts of Alternatives D1, and D2 are the same as those of the Proposed Action. As discussed above, under Alternative D2 the WTG layout will use an east-west orientation, which is more aligned with existing fishing practices. We also understand that other developers with adjacent projects are proposing expanded distances among turbines and an east-west orientation at the request of the fishing industry; however, these reasonably foreseeable future activities are not addressed in the socioeconomic or cumulative analysis. This section does not evaluate potential impacts to fishing vessels if the spacing and orientation of adjacent projects differ, which is an important component of the cumulative analysis.	Sections 3.10.7 and 3.11.6 of the FEIS have been updated to include additional information on D1 and D2.
0248-197	The analysis of impacts to scientific and research surveys outlined in the DEIS is inadequate. While the analysis discusses monitoring that will be conducted as a result of project construction, there is minimal discussion on the impacts to existing long-term surveys conducted in and adjacent to the project area. Our existing surveys and others (i.e. NEAMAP) are not specifically discussed in this analysis. The information provided is very limited and does not support the conclusion of minor beneficial impacts.	Section 3.12 of the FEIS has been revised to provide additional discussion of impacts on scientific and research surveys. Section 3.11.2 of the FEIS has been revised to provide additional discussion of impacts on vessel traffic.
0248-198	Under Section 3.4.5.3 there is reference to the potential need for NMFS survey methodology to be changed in order to account for inability to sample certain areas. However, the DEIS lacks any analysis on the potential impacts to NOAA surveys, or the management decisions that rely on these surveys. The NEFSC has indicated that this project in conjunction with other foreseeable offshore wind development projects would result in the exclusion of potential sampling area. This project would have direct impacts on the federal multi-species bottom trawl survey (BTS) conducted on FSV Henry Bigelow, the Surfclam/Ocean Quahog clam dredge survey conducted on chartered commercial fishing platforms, the integrated benthic/sea scallop habitat survey, and the shelf-wide Ecosystem Monitoring Survey (Ecomon). Any un-towable areas (and their vicinities) along the submarine cable routes would create additional exclusions to current	Additional clarification has been provided in Sections 3.12.2 and 3.12.1 of the FEIS regarding survey efforts potentially impacted by the proposed Project.

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	sampling protocols. The Vineyard Wind and other wind energy project developments would also impact surveys conducted for marine mammals and sea turtles, including North Atlantic Right Whale aerial surveys.	
0248-199	The federal bottom trawl survey is conducted 2 times per year, has been running for over 50 years, and is the single longest running standardized survey of its kind internationally. Data collected from the bottom trawl survey supports a significant scientific enterprise, including the assessments of approximately 63 fish stocks conducted by the NEFSC. The Federal Surfclam/Ocean Quahog survey is conducted on an annual basis and the data from this survey is necessary to perform quantitative stock assessments used to establish catch limits for the clam dredge fishery. The NEFSC integrated benthic/sea scallop survey provides data necessary to perform a quantitative stock assessment used to establish catch limits for the commercial scallop fishery. NEFSC EcoMon survey program is one of the longest continuous ecosystem monitoring programs at the Center with zooplankton monitoring beginning in 1977. The survey provides important hydrographic data with many applications. Larval fish and eggs from the surveys are used to calculate estimates of spawning stock biomass and overall fish biodiversity.	Additional clarification has been provided in Sections 3.12.2 and 3.12.1 of the FEIS regarding survey efforts potentially impacted by the proposed Project.
0248-200	Based on preliminary analysis, the area covered by turbine footings would result in either a loss of sampling area and/or require the development of new alternative survey methodologies and protocols. The development of changes in survey methods may include the design, experimental evaluation, and calibration with existing survey methods; and would be subject to peer review processes consistent with federal fisheries stock assessment processes. While the area of the Vineyard Wind Project may not on its own result in a substantive loss of sampling area for these federal surveys, taken in conjunction with the impending development of other foreseeable future lease developments, the removal of large areas of habitat available to these surveys would have deleterious impacts on federal survey operations and would have consequent impacts on a multitude of fisheries stock assessments.	Additional clarification has been provided in Sections 3.12.2 and 3.12.1 of the FEIS regarding survey efforts potentially impacted by the proposed Project.
0248-201	Based on standard operating practices conducted by the NOAA Office of Marine & Aviation Operations, wind turbine arrays would preclude safe navigation and safe and effective deployment of mobile survey gear on NOAA ships. It is anticipated that NOAA Fisheries chartered commercial vessel survey operations would similarly be affected.	Additional clarification has been provided in Sections 3.12.2 and 3.12.1 of the FEIS regarding survey efforts potentially impacted by the proposed Project.
0248-202	The required analyses to determine the full range of impacts of these sampling area exclusions on the myriad of stocks dependent on these data streams has not yet been conducted. Some examples of likely impacts include the following: removal of sampling area from assessments may reduce the precision on stock	Additional clarification has been provided in Sections 3.12.2 and 3.12.1 of the FEIS regarding survey efforts potentially impacted by the proposed Project.

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	<p>assessment indices of abundance and the accuracy of assessment indices due to survey availability effects; impacts due to required changes in random survey design protocols; and efforts to design and conduct new survey methodologies and protocols that could effectively sample in wind energy areas would also impact precision due to the time to build robust/usable time series. Additionally, any environmental impacts due to the construction and operation of wind farms could result in impacts to survey gear performance, gear efficiency, and availability (e.g., increased sedimentation and water clarity impacts on video or drop-camera survey operations; lighting effects on fish behavior). In addition, any displacement of vessels due to changes in transit corridors or displacement of recreational/commercial fishing effort could further exacerbate the availability of sampling area for NOAA survey operations. As project monitoring plans are further considered and developed we urge that a regional approach be employed; and due to the impacts on existing fisheries survey operations, the design of future site/regional monitoring programs are coordinated with the NEFSC. We encourage you to work closely with our agency in your evaluation of potential impacts to our survey operations and consequent impacts to fisheries stock assessments.</p>	
0248-203	<p>In the third sentence of the ESA paragraph, we suggest that you replace “NOAA Fisheries Services” with “NMFS.” The use of NOAA, NOAA Fisheries and NMFS should be consistent throughout the FEIS.</p>	<p>The FEIS has been updated for consistency on the terms.</p>
0248-204	<p>We suggest that you delete all use of the phrase “NMFS listed species” and replace with “ESA- listed species.” The reason to do this is because a species is listed as threatened or endangered under the ESA. However, it is correct to indicate consultation with NMFS for listed species under our jurisdiction since both NOAA and USFWS administer the ESA jointly. Generally, NOAA exercises jurisdiction over marine and anadromous species and FWS over terrestrial and freshwater species. ESA Section 4(a) (1), 16 U.S.C. § 1533(a)(1), provides for listing species as endangered or threatened.</p>	<p>The FEIS has been updated for consistency on the terms, including Section C.1.2.2.1 in Appendix C.</p>
0248-205	<p>NMFS’ purpose as a Cooperating Agency must be adequately explained. Since NMFS is planning to adopt BOEM’s EIS, the utility of this EIS and reasons we are considered a cooperating agency is not limited to “coordinating and synchronizing the authorization and consultation reviews” with BOEM’s schedule to prepare this EIS and issue a ROD per the One Federal Decisions process. As a cooperating agency, NOAA has a duty to provide information relevant to resources over which it has legal jurisdiction and/or special expertise. This mandate is broad in scope as NOAA has jurisdiction by law and special expertise for the entire suite of marine resources affected by this project (e.g. marine mammals, T&E species, and commercial and recreational fisheries). When NMFS serves as a cooperating agency and adopts another agency’s EIS,</p>	<p>Section C.1.3.2 in Appendix C of the FEIS has updated the discussion of the NMFS roles and responsibilities in the development of the FEIS.</p>

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	we ensure all marine resources under our jurisdiction by law and special expertise is sufficient, considered and addressed in the other agency’s EIS. This includes internal coordination across NOAA via NMFS. This is a primary part of our role and purpose as a cooperating agency per 40 CFR 1501.6 and in determining whether the EIS is suitable for adoption per 40 CFR 1506.3 and NOAA Policy and Procedures for implementing NEPA.	
0248-206	For consistency and accuracy regarding NMFS jurisdiction and purpose to serve as a cooperating agency, the following language should be added to address the above comment: “NMFS is serving as a cooperating agency pursuant to 40 CFR 1501.6 because the scope of the proposed action and alternatives involve activities that have the potential to affect marine resources under their jurisdiction by law and special expertise. As applicable, permits and authorizations are issued pursuant to the Marine Mammal Protection Act, as amended (MMPA; 16 U.S.C. 1361 et seq.); the regulations governing the taking and importing of marine mammals (50 CFR Part 216); the Endangered Species Act (ESA; 16 U.S.C. 1531 et seq.); and the regulations governing the taking, importing, and exporting of threatened and endangered species (50 CFR Parts 222-226). In accordance with 50 CFR Part 402, NMFS also serves as the Consulting Agency under Section 7 of the ESA for federal agencies proposing action that may affect marine resources listed as threatened or endangered. NMFS has additional responsibilities to conserve and manage fishery resources of the United States, which includes the authority to engage in consultations with other federal agencies pursuant to the Magnuson-Stevens Fishery Conservation and Management Act (MSFCMA) and 50 CFR Part 600 when proposed actions may adversely affect Essential Fish Habitat (EFH).”	Section C.1.3.2 in Appendix C of the FEIS has updated the discussion of the NMFS roles and responsibilities in the development of the FEIS.
0248-207	The section is also missing a description of the MMPA process. A description of the MMPA process must be included in this EIS. Currently, Chapter 1, Section 1.1.1 “Other Permits and Authorizations” has a Table depicting federal, state, regional, and local permits and authorizations required for all action alternatives and indicates that consultations are addressed in Chapter 4. However, Chapter 4 does not include a description of the authorization process under the MMPA. The explanation below should be added to Chapter 4 before the explanation of the National Historic Preservation Act (NHPA) on page 4-2, and carry over the footnote for the definition of take, as provided in the footnote herein.	Section C.1.2.6 in Appendix C of the FEIS includes a discussion of the MMPA authorization process.
0248-208	A new subheading for the Marine Mammal Protection Act should be added, with this description: “Section 101(a) of the MMPA (16 U.S.C. 1361) prohibits persons or vessels subject to the jurisdiction of the United States from taking any marine mammal in waters or on lands under the jurisdiction of the United States or on the high seas (16 U.S.C. 1372(a) (1), (a)(2)). Sections 101(a)(5)(A) and (D) of the MMPA provide exceptions to the prohibition on take, which give us the authority	Section C.1.2.6 in Appendix C of the FEIS includes a discussion of the MMPA authorization process.

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	<p>to authorize the incidental but not intentional take of small numbers of marine mammals, provided certain findings are made and statutory and regulatory procedures are met. Incidental Take Authorizations (ITAs) may be issued as either (1) regulations and associated Letters of Authorization (LOA) or (2) an Incidental Harassment Authorization (IHA). LOAs may be issued for up to a maximum period of five years and IHAs may be issued for a maximum period of one year. NMFS also promulgated regulations to implement the provisions of the MMPA governing the taking and importing of marine mammals (see 50 Code of Federal Regulations (CFR) part 216) and published application instructions that prescribe the procedures necessary to apply for incidental take authorization. U.S. citizens seeking to obtain authorization for the incidental take of marine mammals under NMFS’ jurisdiction must comply with these regulations and application instructions in addition to the provisions of the MMPA. Information about the MMPA and 50 CFR 216 is available at https://www.fisheries.noaa.gov/topic/laws-policies#marine-mammal-protection-act</p> <p>Information on the application process is available at: https://www.fisheries.noaa.gov/permit/incidental-take-authorizations-under-marine-mammal-protection-act</p> <p>And the application along with detailed instructions is available at: https://www.fisheries.noaa.gov/national/marine-mammal-protection/apply-incidental-take-authorization</p> <p>Once NMFS determines an application is adequate and complete, NMFS has a corresponding duty to determine whether and how to authorize take of marine mammals incidental to the activities described in the application. To authorize the incidental take of marine mammals, NMFS evaluates the best available scientific information to determine whether the take would have a negligible impact on the affected marine mammal species or stocks and an immitigable impact on their availability for taking for subsistence uses. NMFS must also prescribe the “means of effecting the least practicable adverse impact” on the affected species or stocks and their habitat, and on the availability of those species or stocks for subsistence uses, as well as monitoring and reporting requirements.</p> <p>NMFS received a request from the project proponent for an ITA pursuant to the MMPA for the take of marine mammals, incidental to the construction of the Vineyard Wind project. As outlined above, NMFS reviews applications to determine whether to issue an authorization for the activities described in the application. NMFS will publish a proposed ITA in the Federal Register for public review once the appropriate determinations are made.”</p>	
0248-209	<p>The temporal horizon for reasonably foreseeable future actions seems too constrained in limiting it to Tier 1 and 2 projects. Cumulative impacts from other</p>	<p>BOEM prepared a SEIS that included an expanded planned action analysis, which described the methodology in Chapter 1 and the list of projects considered</p>

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	offshore wind activities do not seem to be incorporated into the impact analysis in more than an extremely general way. There are several more lease areas with projects planned and anticipated dates for receipt of COPs, which should be considered in the analysis. This severely limits the ability to understand the synergistic impacts on different resources from a range of future wind activities.	in Appendix A of the SEIS. Potential impacts are considered as described in Appendix A and in individual resource sections.
0248-210	It is consistent with BOEM's maximum-case scenario to evaluate the cumulative impacts of the broadest range of reasonably foreseeable future actions. Several energy companies have invested large amounts of money in the acquisition of rights to offshore wind energy lease areas, in addition to establishing commercial partnerships. It is reasonably foreseeable that these companies and partnerships will continue their efforts to develop these lease areas. Therefore, consistent with BOEM's maximum-case scenario approach to evaluating impacts, the cumulative impacts section of this EIS should include a qualitative description of the potential impacts associated with development in areas where a lease has been awarded.	BOEM prepared a SEIS that included an expanded planned action analysis, which described the methodology in Chapter 1 and the list of projects considered in Appendix A of the SEIS. Potential impacts are considered as described in Appendix A and in individual resource sections.
0248-211	We are particularly concerned with the lack of cumulative analysis related to biological, social, and economic impacts. For example, there is no specific information provided for impacts to different species/fishing communities from past, present, or reasonably foreseeable future actions. The cumulative impact analysis should be enhanced to include estimated economic impact from past, present, and reasonably foreseeable future actions that will impact fisheries management plans, and ports. In addition, it is not clear that there has been a consideration of how any anticipated displacement of fishing or vessel activity from the project area may result in a change in risk of interactions between those activities and protected species and other fishery resources outside the project area. The discussion of cumulative impacts from non-linear impacts from multiple stressors needs improvement. As appropriate, discuss how and why multiple stressors of different sources and types are not likely to lead to significant population level impacts for marine mammals.	BOEM prepared a SEIS that included an expanded planned action analysis, which described the methodology in Chapter 1 and the list of projects considered in Appendix A of the SEIS. Potential impacts are considered as described in Appendix A and in individual resource sections.
0248-212	This Appendix, and in other sections of the document, often discuss monitoring as a form of mitigation in all capacities. While some types of monitoring could certainly be considered a mitigation tool (i.e. real-time passive acoustic monitoring), after-the-fact monitoring of temporary or long-term impacts does not reduce project impacts. The table in Appendix D includes both mitigation measures (such as time of year restrictions) and monitoring studies of project impacts; however both are referred to as mitigation measures. While we consider monitoring of impacts a critical component of a project of this scale, we do not necessarily consider all of these monitoring plans to be mitigation since they would not all reduce the impacts of the project.	Appendix D of the FEIS has been updated as a result of this and other comments to distinguish mitigation and monitoring.

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0248-213	The DEIS relies upon mitigation to reduce impacts to fishing entities and marine resources and habitat. However, page D-1 of Appendix D notes that mitigation measures under consideration may be beyond BOEM’s authority to require Vineyard Wind to implement. This suggests that at least some of the mitigation measures are optional and may not be implemented. The uncertainty in whether or if such mitigation measures will be implemented undermines our ability to consider how these measures may reduce impacts of the proposed action. Unless such measures are required or committed to by Vineyard Wind, they should not be considered to reduce impacts identified in the DEIS. The FEIS should clearly identify which mitigation measures will be required or have been committed to and are therefore expected to occur versus those that are optional or aspirational.	Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. Additional mitigation and monitoring measures may arise from consultations and coordination with Federal and State resource agencies. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0248-214	As we have noted in our comments the specific fisheries mitigation plans are not included in the document. To date, it is our understanding that only one disruption payment agreement has been made, and only with some fishing entities in the state of Rhode Island. As discussed in our letter, this agreement is not identified nor analyzed in the DEIS, and the potential for this agreement to minimize impacts is unclear.	Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. Additional mitigation and monitoring measures may arise from consultations and coordination with Federal and State resource agencies. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision. The revised Section 3.10 of the FEIS discusses the Agreement and the Trust.
0248-215	A fisheries monitoring plan is not included in the COP or the DEIS. Our agency only recently received a proposed monitoring report from Vineyard Wind on February 25, 2019...It is our understanding that a more detailed monitoring plan is forthcoming. We recommend BOEM and Vineyard Wind work with our Science Center and regional office staff in the development of any monitoring plan that evaluates impacts to our trust resources.	BOEM will work with NMFS on the development of the Fisheries Monitoring Plan.
0248-216	While a regional framework for monitoring is developed, any specific monitoring plan proposed by Vineyard Wind should consider what studies would be appropriate on a regional level and how any specific plan proposed by Vineyard Wind would fit into the regional context.	Thank you for your comment.
0249-001	...the impact on the neighborhood around Covell’s Beach and leading up Strawberry Hill Road...there’s been very [little] or no information that I know of regarding changing it to the Covell Beach landing and the routing the cable from Craigville Beach Road up to Strawberry Hill Road.	Chapter 2 of the DEIS and FEIS describes the alternatives analyzed in the document, including the Proposed Action. As specified in Section 2.1 of the FEIS, the DEIS and SEIS contemplated two Onshore Export Cable Routes (OECRs), with alternative options within each route; however, since the publication of those documents, Vineyard Wind has stated all necessary state and local permits for the Covell’s Beach landfall location have been acquired. Therefore, the Proposed Action (Alternative A) and action alternatives only contemplate the one landfall location, Covell’s Beach landfall and onshore route. Alternative B therefore is no longer evaluated as an action alternative in this FEIS. In addition, Section 2.5 of the FEIS has been included to identify the agency-preferred alternative

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0249-002	I would like to request that there be a mechanism of informing the [Strawberry Hill Road] neighborhood and including those that will be impacted by the cable moving across land and through abutting neighborhoods should be informed and included in the planning process.	As described in Section 3.4.6.3 of the Draft FEIS as well as COP Volume III, Section 4.2 (Epsilon 2020a), Vineyard Wind would develop a Traffic Management Plan to “minimize disruptions to residences and commercial establishments in the vicinity of construction and installation activities.” Vineyard Wind would also provide a construction monitor. As part of these processes, the public would be notified. No changes in the FEIS were warranted.
0250-001	Vineyard Wind is the first major offshore wind project in the United States and it represents a significant step in reversing our reliance on fossil fuels. The positive environmental impacts are numerous including, but not limited to, helping to ameliorate the impacts of ocean acidification, loss of sea ice, sea level rise, and extreme weather. In addition, climate change poses significant threats to the Cape’s natural resources and economy. So this project gives us the opportunity to participate in one of many efforts in response to this crisis.	Section 1.2 of the DEIS included a discussion on the Purpose and Need for the proposed Project; the purpose and need statement in the FEIS is essentially identical to what was presented in the DEIS. In addition, Section A.8.1 in Appendix A provides a description of the potential positive impacts of the proposed Project on air quality and greenhouse gas emissions. The FEIS includes the beneficial impacts of the proposed Project in each resource-specific section in Chapter 3, as appropriate.
0250-002	While the economic benefits to being a partner with the largest offshore wind farm are significant, the Town of Barnstable had to seriously and thoughtfully consider all the potential threats a project like this could pose. The proposed route has cables running underneath the sea floor of Nantucket Sound making landfall at one of our most popular beaches. And from there, traveling through several neighborhoods as they head north to the industrial park in Hyannis where the substation is to be located. There are potential threats to our marine and coastal environments, as well as threats related to our drinking water. Over the past several months Vineyard Wind has worked closely with the Town of Barnstable, local fisherman, conservation NGOs, state and local agencies to ensure that this project will occur in a way that avoids, minimizes, and mitigates adverse impacts on the health of our coastal and marine ecosystems. The siting of both the wind farm, as well as the cable route was done in discussions with numerous stakeholders to ensure that the project posed minimal environmental and human impact. We had concerns about the impacts on our marine environment where whales, boaters, recreational and commercial fishermen, marine life, birds, water quality and coastal habitat might all be affected. Vineyard Wind has worked closely with our town manager, as well as DPW to determine the best route once the cable made landfall to ensure the project’s impacts were minimal where it concerns sensitive habitat areas and residential neighborhoods.	Potential impacts on marine and coastal environments as well as potential impacts on water quality are discussed in the respective resource sections within Chapter 3 and Appendix A of the FEIS. Mitigation measures are outlined in Appendix D, and these have been updated since the publication of the DEIS to take into consideration new agreements made, public and stakeholder comments, and on-going consultation with resource agencies. Additional monitoring and mitigation, if required, will be developed in coordination with applicable Federal, State, and local resource agencies and/or other stakeholders.
0250-003	The singular most critical concern is the risk to ground water and public water...Specifically, our concerns were in relation to the proposed substation. The proposed location of Vineyard Wind’s electrical substation in Independence Park, Hyannis, is located above the sole source aquifer that services the town’s public water supply wells in the Hyannis area and upgrading it from the town’s Hyannis wells. The electrical substation will house yet to be identified electrical equipment, some of which is expected to be cooled by dielectric fluids. These	Section A.8.2 of the FEIS (formerly 3.2.2 of the DEIS) addresses potential impacts on water quality, including the expressed concern at the proposed substation site. Therefore, no revisions to the FEIS were necessary.

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	<p>dielectric fluids, if not properly managed, could pose a risk to ground water and public water supplies...In order to ensure safety and containment of these fluids, Vineyard Wind has committed to providing a designed containment equal to a quote, “minimum of 110 percent of the dielectric fluid volume contained in the associated equipment. Plus an additional volume to include the 100-year-storm event over a 24-hour period, as well as to providing dielectric fluid containment under each piece of substation equipment containing dielectric fluids,” end quote. The company has committed to state-of-the-art containment at its substation at Independence Park and is working closely with town officials on final design standards. Additionally, 16 million dollars in supplemental funding, included in the host community agreement with the town has been dedicated to future water infrastructure and protecting our drinking water resources. I would also note that while traditional cables carry toxic fluids throughout their entire length, Vineyard Wind’s cables are solid their entire length and hence mitigate a major concern of ours regarding leakage at any point along the cable route, whether that’s along the sea floor or along land through neighborhoods.</p>	
0250-004	<p>The town also worked with Vineyard Wind to mitigate noise pollution generated by the substation. To ameliorate this concern, Vineyard Wind will employ enhanced noise mitigation through the additional barriers in order to reduce the impacts on residents at the Village Green complex. They have also added enhancements to the proposed barrier walls and added interior walls to better address noise concerns.</p>	<p>Thank you for your comment.</p>
0250-005	<p>[survey] data confirmed that eelgrass can be avoided along the Covell’s Beach route. This is critical as it is an important habitat area that provides refuge and sustenance to a variety of animals and is a critical component of sediment and shoreline stabilization. The horizontal directional drilling approaches onto Covell’s Beach will avoid all documented eelgrass mapped hard bottom--eelgrass and mapped hard bottom eliminating potential near-shore environmental impacts.</p>	<p>Avoidance of eelgrass beds during construction via the use of HDD methods was discussed in Section 3.3.4.1 of the DEIS (Section 3.1.1 of the FEIS). Therefore, no change in the FEIS was warranted</p>
0250-006	<p>All major projects will have some impact, and Vineyard Wind is no exception. But failure to move forward on projects such as this will have far more catastrophic effects to humans and the environment and will imperil even further those things that we profess that we want to protect. Throughout this process Vineyard Wind has worked diligently and successfully to avoid the potential for most environmental impacts. Working with a growing list of stakeholders, Vineyard Wind is making every effort to ensure that this project will occur in a way that avoids, minimizes, and mitigates adverse effects and impacts on the health of our coastal and marine wildlife. I wholeheartedly support this project and look forward to continuing to work together.</p>	<p>Section 1.2 of the DEIS included a discussion on the Purpose and Need for the proposed Project; the purpose and need statement in the FEIS is identical to what was presented in the DEIS. In addition, Section A.8.1 in Appendix A of the FEIS provides a description of the potential positive impacts of the proposed Project on air quality and greenhouse gas emissions. Section 2.4 of the FEIS has been updated based on public and stakeholder comments to provide a summary of potential beneficial impacts of the proposed Project.</p>

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0251-001	<p>...we want to ensure that science-based measures that avoid, minimize, and mitigate the impacts on wildlife and habitat, especially our most vulnerable species, are implemented at every stage. Vineyard Wind's committed to responsible offshore wind development was recently demonstrated in the landmark agreement between Vineyard Wind, the Conservation Law Foundation, the Natural Resources Defense Council, and the National Wildlife Federation to protect North Atlantic right whales during the construction and operation of this project...Because of the importance of this wind energy area to right whales and their feeding, breeding, and migratory behaviors, Vineyard Wind made the following commitments in this agreement: No pile driving from January 1 through April 30th when right whales are most likely to be present in the project area, and the use of underwater noise reduction technologies when pile driving does occur. An enhanced monitoring protocol for pile driving and geophysical surveying requires the area to be cleared before pile driving or surveys are initiated, monitors the area during the activity with real-time passive acoustics, visual observers, and aerial surveys depending upon the activity and time of the year, and does not allow initiation of these activities at night or during periods of poor visibility. And a vessel speed restriction of 10 knots or less for nearly all project associated vessels from November 1 through May 14th, and throughout the year if the National Marine Fisheries Service establishes a dynamic closure because of right whale aggregations. Crew transport vessels may only be exempted from this requirement if additional monitoring measures are in place. It's our view that the measures in this agreement are necessary to ensure adequate protection of endangered right whales. And CLF strongly recommends that BOEM incorporate these mitigation measures into the FEIS.</p>	<p>Section 1.2 of the DEIS included a discussion on the Purpose and Need for the proposed Project; the purpose and need statement in the FEIS is identical to what was presented in the DEIS. In addition, Section A.8.1 in Appendix A of the FEIS provides a description of the potential positive impacts of the proposed Project on air quality and greenhouse gas emissions. The FEIS includes the beneficial impacts of the proposed Project in each resource-specific section in Chapter 3, as appropriate. Appendix D of the FEIS has been updated and takes into consideration Vineyard Wind's commitments to mitigate the potential impacts on the North Atlantic right whales. An updated assessment of these mitigation measures and potential impacts is included in Section 3.4 of the FEIS based on public and stakeholder comments as well as on-going resource agency consultations.</p>
0251-002	<p>With respect to the proposed cable route, we prefer alternative B and the offshore export cable landfall at Covell's Beach. This alternative uses horizontal direct drilling technology to avoid disturbance of the near shore and beach environment and will result in fewer impacts and risks to winter flounder spawning areas, horseshoe crabs, and other benthic resources that the Lewis Bay landfall option described in alternative A does not meet.</p>	<p>Section 3.2.2 of the FEIS has been updated in light of COP revisions committing the proposed Project to the Covell's Beach landfall site.</p>
0251-003	<p>The project also takes place in essential fish habitat for depleted populations of Atlantic cod, winter flounder, Atlantic wolffish, and the yellowtail flounder, as well as Endangered Species Act with its listed species including Atlantic salmon, Atlantic sturgeon, shortnose sturgeon and the giant manta ray. To minimize the impact on these species we urge BOEM and Vineyard Wind to work closely with the National Marine Fisheries Services and state fisheries managers in Rhode Island and Massachusetts to implement appropriate mitigation measures, particularly during vulnerable times of spawning, larvae settlement and juvenile development.</p>	<p>The potential impacts on finfish in Section 3.3 of the FEIS have been updated in response to on-going consultation with resource agencies and comments from stakeholders and the public. BOEM has also coordinated with NMFS in the development of an Essential Fish Habitat Assessment and a Biological Assessment. These documents are available for public viewing on BOEM's website.</p>

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0251-004	given that offshore wind is in its infancy we urge BOEM, in partnership with Vineyard Wind, and in consultation with state and federal fishery managers to conduct comprehensive monitoring, both before, during and after construction of this project. This long-term monitoring will document changes to the marine environment and its ecological communities and allow for the development and implementation of appropriate adaptive strategies in the future.	The updated Appendix D of the FEIS provides a description of long-term monitoring to be conducted in coordination with SMAST. Additional monitoring and mitigation, if required, will be developed in coordination with applicable Federal, State, and local resource agencies, and/or other stakeholders.
0251-005	At this time, we strongly encourage BOEM to prepare an FEIS that fully analyzes the potential impacts and benefits of this project, including consideration of Vineyard Wind’s commitments to mitigate the impacts on right whales.	Appendix D of the FEIS has been updated and takes into consideration Vineyard Wind’s commitments to mitigate the potential impacts on the North Atlantic right whales. An updated assessment of these mitigation measures and potential impacts is included in Section 3.4 of the FEIS based on public and stakeholder comments and on-going resource agency consultations. Additional monitoring and mitigation, if required, will be developed in coordination with applicable Federal, State, and local resource agencies, and/or other stakeholders
0251-006	And [BOEM should analyze] the cumulative impacts of all other wind projects in the area so that this project, and others, are on the right path forward in the development of offshore wind.	BOEM prepared a SEIS that included an expanded planned action analysis, which described the methodology in Chapter 1 and the list of projects considered in Appendix A of the SEIS. Potential impacts are considered as described in Appendix A and in individual resource sections. Additionally, Appendix A has been updated to outline the methodology for assessing potential effects and includes a listing of the other offshore wind projects that are evaluated in the resource-specific sections in Chapter 3 and Appendix A.
0252-001	The DEIS is incomplete, inadequate, or totally absent in its analysis of the commercial fisheries. For instance, it focuses on fisheries is too narrow. It completely fails to consider the collateral damage that can be done. For instance, if the squid and fluke are disturbed in their migration patterns, and the Nantucket Sound fisheries for these species fail, state permitted vessels will probably end up in Cape Cod Bay working on ground fish and exceeding the state sub ACO of the federal Multi-Species Plan. This is damage that will be done outside of the Vineyard Wind lease area.	Section 3.10 of the FEIS has been updated in response to public and stakeholder comments as well as on-going consultation with resource agencies and addresses potential impacts on commercial fisheries, including potential displacement of fishing efforts. Appendix D has also been updated in the FEIS and outlines potential mitigation measures, including those to avoid, reduce, or minimize impacts on commercial fisheries. Additional monitoring and mitigation, if required, will be developed in coordination with applicable Federal, State, and local resource agencies, and/or other stakeholders
0252-002	In relation to the right whales. Right now there’s a hundred--over a hundred right whales that are year-round there. So if Vineyard Wind is not going to pile drive in their presence, I don’t know when they’re going to pile drive.	Appendix D of the FEIS has been updated and takes into consideration Vineyard Wind’s commitments to mitigate the potential impacts on the North Atlantic right whales, including noise reduction technologies to be used during pile driving activities as well as time-of-year restrictions. An updated assessment of these mitigation measures and potential impacts is included in Section 3.4 of the FEIS based on public and stakeholder comments and on-going resource agency consultations.
0252-003	The largest European project is 55 square miles. This project is 25 times the size of Europe’s largest one. For a project this size, and the impacts it might have, we need to recognize the high standards American fishermen, and when I say that I mean recreational, charter and commercial, are held to. The citizens of the United	Section 3.10 of the FEIS has been updated in response to public and stakeholder comments as well as on-going consultation with resource agencies; it addresses potential impacts on commercial and recreational fisheries. Appendix D has also been updated in the FEIS and outlines potential mitigation measures, including

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	States should expect that the foreign-owned company of Vineyard Wind needs to be held to a similar standard for the impacts they will have on our marine territories. Tax credits are tax dollars, and this project is being built with U.S. tax dollars to a foreign company.	those to avoid, reduce, or minimize impacts on commercial fisheries. Additional monitoring and mitigation, if required, will be developed in coordination with applicable Federal, State, and local resource agencies, and/or other stakeholders
0253-001	...we stand in strong support of a timely conclusion to the EIS process and record of decision in moving the Vineyard Wind project into construction...we feel both the siting and the permitting process have been thorough and have called out concerns, particularly with regards to traditional uses, such as fishing and maintaining a healthy marine environment. We feel those concerns have been addressed and are being addressed in both cases...We do feel it's important that this project be a learning process as there are more projects to come, it appears.	Thank you for your comment.
0253-002	And that it's important that we continue to monitor through this construction phase and operation of what the impacts are and use that as learning opportunities for future development.	Appendix D of the FEIS has been updated with modified and new measures developed in response to on-going resource agency consultations and public comments, including pre- and post-construction monitoring of marine resources to address effects of Project operations. Additional monitoring and mitigation, if required, will be developed in coordination with applicable Federal, State, and local resource agencies, and/or other stakeholders.
0253-003	In summary, we're excited at both the opportunities to create a renewable energy future for both the United States and Massachusetts. To build a new industry and supply chain that will support our region's residents and to improve the resilience and reliability of our region's electrical system. So for those reasons, we urge your final approval and look forward to a positive record of decision to get this project rolling.	Thank you for your comment.
0254-001	The industry presents opportunities to create jobs and economic growth. Offshore wind will require input from the local and regional supply chain, which the Network is dedicated to expanding and educating. We support that Vineyard Wind project, as well as the other projects along the East Coast, and we look forward to the future of offshore wind in the U.S.	Section 3.6 of the FEIS has been updated in response to on-going agency consultations and public comment to address the potential impacts on demographics, employment, and economics.
0255-001	We believe it is of paramount importance that any Environmental Impact Statement prepared for projects off our coast accurately account for the impact that these projects may have on the commercial fishing industry. Unfortunately, the DEIS as it currently stands does not inspire confidence that that accounting is taking place. In our review, in the section 3.4.5 of the commercial fisheries and for-hire recreational fishing impacts, we found that 75 percent of the tables containing easily verifiable publicly accessible data contain errors. These include mixing up landings between years and not accurately representing the value of landings within a given year. If you grab the value of landings from the Vineyard Wind WLA table 3.4.5-4, they show a decrease in trend over time. However, as the data is reported in the original analysis conducted by the renowned DEM, that	Section 3.10 (formerly 3.4.5) of the FEIS has been updated, including the data tables, in response to public and stakeholder comments as well as on-going consultation with resource agencies; it addresses potential impacts on commercial fisheries, including potential displacement of fishing efforts. Section 3.10 includes new information related to the value of port landings harvested from the Vineyard Wind WLA based on VMS data. Data is also presented for port landings based on VTR data. Appendix D has also been updated in the FEIS and outlines potential mitigation measures, including those to avoid, reduce, or minimize impacts on commercial fisheries. Additional monitoring and mitigation, if required, will be developed in coordination with applicable Federal, State, and local resource agencies and/or other stakeholders.

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	<p>same time period shows an increase in the landings value generated from the lease area. This is likely a clerical error in which columns were mislabeled. But the fact that it occurs throughout the section of this report, along with the mislabeling of figures and erroneous comments drawn from these figures leads us to the conclusion that the report does not represent the quality of work that the taxpayers deserve. The purpose of the environmental impact assessment is to provide full and fair discussion of significant environmental impacts and inform decision-makers and the public of the reasonable alternatives which would avoid or minimize adverse impacts. If the remainder of the document is written with the same care and attention to detail of section 3.4.5 how can we trust any of it? We firmly believe that at least this section needs a substantial and careful reworking.</p>	
0256-001	<p>Last December APCC issued a public statement endorsing the Vineyard Wind project. The decision to support the project followed our comprehensive review of Vineyard Wind’s multiple state regulatory filings to the Massachusetts Environmental Policy Act process, as well as the release of BOEM’s draft Environmental Impact Statement. We believe Vineyard Wind has largely addressed the major issue areas associated with the project through proposed actions that would avoid, minimize or mitigate most of the potential environmental impacts in the offshore and onshore aspects of the project.</p>	<p>Thank you for your comment.</p>
0256-002	<p>APCC recognizes that any project of such a large scale will inevitably have some impacts, and Vineyard Wind is no exception. However, impacts to the environment and to the human society will be catastrophically more significant if nothing is done to address climate change, and if projects, such as Vineyard Wind do not move forward. As the first major offshore wind project in the United States, Vineyard Wind will be a significant step forward in the effort to shift our reliance from fossil fuels to clean renewable energy sources.</p>	<p>Section 1.2 of the DEIS included a discussion on the Purpose and Need for the proposed Project; the purpose and need statement in the FEIS is identical to what was presented in the DEIS. In addition, Section A.8.1 in Appendix A of the FEIS provides a description of the potential positive impacts of the proposed Project on air quality and greenhouse gas emissions. The FEIS includes the beneficial impacts of the proposed Project in each resource-specific section in Chapter 3, as appropriate.</p>
0256-003	<p>Our expectation is that Vineyard Wind will continue to do due diligence in addressing the key environmental issues associated with this project. And it is also our expectation that Vineyard Wind will continue to work with federal and state regulatory agencies, as well as various stakeholders including us, APCC, on mitigation and strategies that will improve the project, which in turn will help establish standards for the development of future offshore wind projects.</p>	<p>Thank you for your comment.</p>
0257-001	<p>You know, for nine years, almost ten years, Cape Air has been pursuing an effort to become net zero in terms of electricity, and in terms of our carbon fuel burn. And during that time—and we’ve made some success, especially with electricity. But during that time we have seen the aspects of global climate change impact Cape Cod tremendously. And it seems like every week you read in the paper and you see something new happening. So, you know, I’m basically here on behalf of Cape Air to say, let’s go.</p>	<p>Section 1.2 of the DEIS included a discussion on the Purpose and Need for the proposed Project; the purpose and need statement in the FEIS is identical to what was presented in the DEIS. In addition, Section A.8.1 in Appendix A of the FEIS provides a description of the potential positive impacts of the proposed Project on air quality and greenhouse gas emissions. The FEIS includes the beneficial impacts of the proposed Project in each resource-specific section in Chapter 3, as appropriate.</p>

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0257-002	We have seen a process that is full of serious thoughtful work at mitigating. So we do not see a commercial energy project that is operating below the radar. We see a great process...From our perspective at Cape Air, we want to see this thing done. We are facing a time when electricity is going to be producing most of our heating and cooling, most of our transportation. And we have a much greater need for electricity than we've had in the past...I think all voices here are being heard.	Thank you for your comment.
0257-003	And hopefully for, you know, reducing the impacts of global climate change, we will see this process through to the end and we will be the leaders in developing offshore wind energy.	Thank you for your comment.
0258-001	One of the big positives in this proposal is that we are essentially going to get artificial reefs built for free. Where we are, the Commonwealth's fishermen are willing to take money out of their pockets to build artificial reefs for a variety of reasons, but to enhance habitat, attract fish, concentrate fish, et cetera. The fact that this thing is going to be built will have that kind of benefits, that that benefit should not be missed.	Section 3.4.4 of the DEIS addressed recreational fishing, and Section 3.4.5 of the DEIS addressed commercial fisheries and for-hire recreational fishing (Sections 3.9 and 3.10 of the FEIS). These potential beneficial impacts were evaluated in the DEIS. Therefore, no changes to the FEIS were warranted.
0258-002	The number one issue of concern for the recreational fishing community is potential loss of access to the very productive, mostly offshore, fisheries that occur in this area at certain times of the year, mostly summer and fall. Besides the unique-to-this-area and impossible-to-replace social value of these fisheries, any loss of access in this area would result in significant impacts to the local fishing and boating economy. This is a high-dollar fishery prosecuted by vessels with average values of well over \$100,000, up to \$1,000,000, outfitted with fishing related electronics packages that start at \$10,000. And even the smallest vessels on the tightest budgets can't go fish out there without over \$10,000 in just rods and reels alone. This document needs more analysis of what impacts to the recreational sport fishing community in the Vineyard Wind project area--what are those potential impacts. And the reason is, because this document does assume that access will be up to those turbines...until we have legal language somewhere in this process that says we can fish up to them, we have to be concerned about case law that comes from on-land public lease areas of energy sites between Nevada and California. There are situations in case law where areas were leased with an assumption that there would be public access, but later on the owners of those lease areas decided to put up fences. We have to make an assumption--we have to see in writing that public access in these areas will be.	Section 3.10.2 has been updated in response to on-going agency consultation as well as public and stakeholder comments, including updated discussions of the potential for restricted access during construction and installation of offshore Project facilities. While some temporary restriction will be required during construction and routine maintenance, access to the WDA and OECC will not be restricted during operations. BOEM does not have the authority to restrict access to or within the WDA.
0258-003	the document [should state]...the significant impact that would happen if recreational fishing access and the offshore sport fishery was not allowed in there. That would be the first place, in a way that in this DEIS our concern could be acknowledged. Because the impact will be significant to our community if we	Section 3.10.2 of the FEIS has been updated in response to public and stakeholder comments as well as on-going agency consultation and includes updated discussions of the potential for restricted access during construction and installation of offshore Project facilities. While some temporary restriction will be

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	lose access there beyond the obvious safe construction zones that need to be. Another way would be by a permit condition. In the final record of decision you could say that it's only because of your judgment of impact that you could say as a permit condition that access must be. And how would you word that?...we would suggest that the current coast guard regulations regarding aids to navigation, which is exactly what is used to govern access in oil rigs in the Gulf of Mexico, that that language is understood by both the boating community, the fishing community, and the enforcement community. And obviously, we all need to be on one page to be able to manage access. So some version of that language, in the same way that it's done in the Gulf of Mexico, would be the way to get by that concern.	required during construction and routine maintenance, access to the WDA and OECC will not be restricted during operations. BOEM does not have the authority to restrict access to or within the WDA.
0258-004	to look at the Vineyard Wind project alone and not consider it as a cumulative impact, or a part of cumulative impact, it's impacts are going to change when there's another wind farm the same size next to it. They'll both be contributing to a larger impact. When eight go down the line of this map in a row, the cumulative impacts, that we have no idea will be, are going to be massive. To have a separate way of public expert commercial recreational fishing and environmental advice for each one of those eight private groups that have been convened by developers, that may be good for the developers, that's not good for the public...BOEM, in some way, shape or form needs to build public input into it, whether that's through use of the Federal Advisory Committee Act or whatever else. But a mechanism of public input that gives advice to--as these things develop, and as we learn about the impacts, must be incorporated in this so that we know we have a say. Because, you know, seven billion dollars later and half of them are built, [it] is going to be too late and we all realize that. So the reality is, building a new system that works for all stakeholders so that we know that input, as we learn the things that we know we don't know now. But beside that, we want to see these happen. The potential benefits. Most recreational anglers who have done the work and have been in conversation, and the ones that we have gone out and talked to, believe that this is a valuable project if done right. So please continue.	BOEM prepared a SEIS that included an expanded planned action analysis, which described the methodology in Chapter 1 and the list of projects considered in Appendix A of the SEIS. Potential impacts are considered as described in Appendix A and in individual resource sections.
0259-001	The Cape Light Compact Governing Board supports the development of local renewable energy projects, such as Vineyard Wind, and supports the Massachusetts legislature and Baker administration's pursuit of responsible offshore wind development.	Thank you for your comment.
0260-001	Yarmouth Energy Committee officially voted a statement of support for the Vineyard Wind project as a means to mitigate climate change through replacing fossil fuels with renewable energy sources for generating electricity. Since our initial statement of support we've been impressed with Vineyard Wind's willingness to work with communities where construction may cause temporary	Section 1.2 of the DEIS included a discussion on the Purpose and Need for the proposed Project; the purpose and need statement in the FEIS is identical to what was presented in the DEIS. In addition, Section A.8.1 in Appendix A of the FEIS provides a description of the potential positive impacts of the proposed Project on air quality and greenhouse gas emissions. The FEIS includes the beneficial

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	disruption of traffic or commercial activities, including fishing. Cape Cod is on the front line of sea level rise and we urgently need this project.	impacts of the proposed Project in each resource-specific section in Chapter 3, as appropriate.
0261-001	Over the past 10 years the fishing industry has been hit hard with increasing regulations causing reductions in our ability to fish and make a good living. Last year one of our vessels and its crew was hired as a subcontractor for a bird survey on the Vineyard Wind lease area. Although this work is limited, any boatman knows every day of work on the water is important. My hope is that local businesses, fishermen, vendors will benefit from the new offshore wind industry, both during construction and operation. This, along with other fishing industry mitigation measures, I hope you move forward with this project.	Section 3.6 of the FEIS has been updated in response to on-going agency consultations and public comment to address the potential impacts on demographics, employment, and economics. Appendix D of the FEIS still includes a specific potential mitigation measure for BOEM to potentially require a local hiring plan as a condition of COP approval.
0262-001	With the increasing size of the turbines, [is] the staging facility in New Bedford going to be obsolete before it's even used?	As discussed at the public hearing, and as presented in Chapter 2 of the FEIS, Vineyard Wind and their turbine supplier have a lease agreement with the New Bedford Commerce terminal. It is expected that the terminal would support most, if not all, of the necessary operations for the turbine components. Section 2.1.1 of the FEIS has been updated to include this information.
0263-001	Our main concern was the bottom, whether it was going to be--become a reef. Or if it was a sandy bottom, was that going to be replenished as a sandy bottom, regarding the flounder and so forth.	Sections 3.1 and 3.2 of the FEIS address the coastal habitats and benthic resources near the proposed Project, respectively. Information and analysis has been updated in these sections of the FEIS based on public and stakeholder comments as well as ongoing consultation with resource agencies.
0263-002	And the other question that we had was the containment of fluids inside the turbines. If there was a problem with one of the turbines, whether it leaked antifreeze or oils or the--any other fluids that are in there, are they--is it self-contained, and you know, would that have an impact on the water in the area?	Section 2.3 of the DEIS and FEIS address non-routine activities and low probability events. Section A.8.2 in Appendix A of the FEIS addresses potential water quality impacts associated with the proposed Project, particularly related to potential spills. This assessment in the FEIS remains largely unchanged since the DEIS.
0264-001	I'm a union pile driver and a commercial diver, and I specialize in submarine cable lays and directional drilling installations for the beach landings. And I guess my comment or question here is, I work on the water. I make all my money in or on or around the water. And hearing some of the other concerns from other groups here that I think have been very good. I'm just kind of wondering how this impacts me. Because I need to make my money in the water, too. And I know the fishermen need to make their money. And this seems to be on federal leased land. And I think this area needs to be open for people like myself and my fellow commercial divers to be a able to make our paychecks to support our families, also.	Section 3.4.1 of the Draft (3.6 of the FEIS) addressed potential employment impacts and opportunities. As such, no changes to the FEIS text were warranted.
0265-001	I wanted to say that the alternative B is acceptable to a hundred of us in Yarmouth who originally supported the New Hampshire Avenue siting. The Covell's Beach siting also has low environmental impact.	As specified in Section 2.1 of the FEIS, the DEIS and SEIS contemplated two Onshore Export Cable Routes (OECRs), with alternative options within each route; however, since the publication of those documents, Vineyard Wind has stated all necessary state and local permits for the Covell's Beach landfall location have been acquired. Therefore, the Proposed Action (Alternative A) and

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		action alternatives only contemplate the one landfall location, Covell’s Beach landfall and onshore route. Alternative B therefore is no longer evaluated as an action alternative in this FEIS. In addition, Section 2.5 of the FEIS has been included to identify the agency-preferred alternative.
0265-002	Additionally, I’m a member of the five Cs of Cape Cod Climate Change Collaborative faith communities environmental network. I co-chair that. And we look forward to working with Vineyard Wind in the future for many, many years to help mitigate the local environmental justice impacts, which I understand there are some that are moderate to major.	Thank you for your comment.
0265-003	This moment in time is an all-hands-on-deck moment where we need to rapidly move to reduce fossil fuels and increase offshore wind and solar as renewable energy.	Thank you for your comment.
0265-004	There are positive economic impacts to be had, as you mentioned in your talk, especially locally. Though we will need to transition some recreational and commercial fishing in a sustainable direction. And I know this is difficult on some of the members who are here in the room tonight.	Thank you for your comment.
0266-001	When can Yarmouth expect the permanent removal from documents of New Hampshire Avenue as a possible landing site for Vineyard Wind cables? And I have another question. Is there any possibility that Vineyard Wind, like the bad penny, will come back to New Hampshire Avenue for cable landing for its new lease south of the Vineyard and/or possibly ones from Nantucket?	As specified in Section 2.1 of the FEIS, the DEIS and SEIS contemplated two Onshore Export Cable Routes (OECRs), with alternative options within each route; however, since the publication of those documents, Vineyard Wind has stated all necessary state and local permits for the Covell’s Beach landfall location have been acquired. Therefore, the Proposed Action (Alternative A) and action alternatives only contemplate the one landfall location, Covell’s Beach landfall and onshore route. Alternative B therefore is no longer evaluated as an action alternative in this FEIS. In addition, Section 2.5 of the FEIS has been included to identify the agency-preferred alternative.
0267-001	having heard the testimony so far, I did want to reflect on the CLF, et. al decision with Vineyard Wind. I would encourage careful adherence and inclusion of that in any future documents. The reason is that we do have a small and declining population of right whales. Their future is clearly in doubt. The estimated population has dropped to something on the order of 400 and--well, the statistical is 411 animals. The calving rate is now--well, as of yesterday, we had six calves this year. But the calving rate is extraordinarily low. The mortality rate is very high. And for most of us, clearly, any more stress on the population could spell the end of the population...there has been, as you may know, a discovery by New England Aquarium, and federal flying teams that we work with, of an aggregation of whales not previously seen in previous years south of Nantucket. An area that I believe is outside the--your present considerations. But nonetheless, apparently is one that forms periodically, perhaps 25 to 30 or 40 or more whales. A significant portion of the remaining population. My	Appendix D of the FEIS has been updated and takes into consideration Vineyard Wind’s commitments to mitigate the potential impacts on the North Atlantic right whales, including time-of-year restrictions, use of noise reduction technologies, and monitoring during construction. An updated assessment of these mitigation measures and potential impacts is included in Section 3.4 of the FEIS based on public and stakeholder comments and on-going resource agency consultations. Additional monitoring and mitigation, if required, will be developed in coordination with applicable Federal, State, and local resource agencies and/or other stakeholders.

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	<p>understanding of the CLF agreement--the CLF et. al., is that there will be a cessation of activities in areas that are blocked out by federal agencies in future years if these aggregations are found there. I would lastly point out that we don't know much about right whales. We know much less than people think we do. The aggregation in that area is one that is likely to occasionally form. Maybe not exactly where it has this year. And the concern we have is that the whales are in a very--well, in a dynamic state right now. Most of us believe, incidentally, that that is likely due to substantial changes in the ocean ecosystem resulting in changes in their--the distribution of their prey and resulting in whales showing up in places that they were not previously seen. The cause of that, most of us are beginning to realize, is climate change which has a curious feed-in to the discussions today...I personally believe that if that agreement is followed that these unusual occurrences of right whales near the areas of consideration will be likely as conservation oriented as possible. The last--I guess the last point I would make is that I have a lot of conversations with good friends who are acoustic specialists related to right whales. And the great concern that we have at present relates to the noise made during the construction. And as I understand it, that also is covered in the CLF agreement.</p>	
0268-001	<p>I'm excited about the potential this project brings to set a new course for this nation's energy future as the first large-scale offshore wind project. The first large-scale offshore energy project that is beneficial to environment instead of posing risks like our past efforts at fossil fuel extraction offshore.</p>	<p>Section 1.2 of the DEIS included a discussion on the Purpose and Need for the proposed Project; the purpose and need statement in the FEIS is identical to what was presented in the DEIS. In addition, Section A.8.1 in Appendix A of the FEIS provides a description of the potential positive impacts of the proposed Project on air quality and greenhouse gas emissions. The FEIS includes the beneficial impacts of the proposed Project in each resource-specific section in Chapter 3 and Appendix A, as appropriate.</p>
0268-002	<p>This is an incredible economic development opportunity for this region. And it's also a job opportunity for our young people, and that's really important. As an advocate and an energy consultant I'm excited about the possibility of this project interconnecting and meeting more than the region's needs for its power with locally generated renewable energy, and then to see this region become an exporter of green power into Massachusetts. It's very important for this region to see itself and to establish itself as an energy leader.</p>	<p>Section 3.4.1 of the Draft (3.6 of the FEIS) addressed the potential economic effects of the proposed Project. As such, no changes to the FEIS text were warranted.</p>
0268-003	<p>I want, again, urge BOEM to continue to look at the comments it receives here, to address them expeditiously, and also to weigh very carefully the potential of this new industry against some of the harms that other industries, that are here before you today, and at other hearings, complaining and worrying about their livelihoods being threatened. The offshore wind industry needs a chance to stand on its own.</p>	<p>Thank you for your comment.</p>

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0268-004	The commercial fishing industry has had a chance to stand on its own, for not just decades, but centuries. The industry has caused harm in the past and should not be given the opportunity to delay this project going forward. That's not at all to say that their concerns should not be addressed throughout your process. And I think a lot of them have been and will continue to be as you go to a final Environmental Impact Statement. But just--you need to weigh both industries together and not give an incumbent an advantage.	Thank you for your comment.
0269-001	I just want to say that I'm terrified that natural gas pipeline goes over our aging and decrepit bridges. So unless financial aid and revenues go---federal and state-- - towards repairing or replacing those bridges it's not looking good. And I live in Sandwich, so the natural gas component addition to our power plant, that's terrifying me, also. So with that said, renewable energy is the way to go.	Thank you for your comment.
0272-001	The Northeast in general is beautiful and rich and full of resource of many types, but it has not been traditionally a place where you generate a lot of electrical energy. We are dependent on resources from other parts of the country, other parts of the world and our generation facilities currently are aging. Things like nuclear power plant are in the process of heading towards the end of their life and decommissioning and it's really imperative that we square away electrical production for the Northeast, and offshore wind is the most viable way to produce consistent and--you know, consistent both in its continuous generation, but also consistent in the amount of energy it will produce going forward. And it's going to drive not only the technologies of the future in our future homes and businesses, but also the creation of this and forward thinking of a project like this, is going to inspire people and the young people of the northeast to think about a greener future or think about the future of technology.	Section 1.2 of the DEIS included a discussion on the Purpose and Need for the proposed Project; the purpose and need statement in the FEIS is identical to what was presented in the DEIS. In addition, Section A.8.1 in Appendix A of the FEIS provides a description of the potential positive impacts of the proposed Project on air quality and greenhouse gas emissions. The FEIS includes the beneficial impacts of the proposed Project in each resource-specific section in Chapter 3 and Appendix A, as appropriate.
0273-001	We are going to eventually have to migrate away from fossil fuels for lots of different reasons, mostly environmental. And wind is a natural renewable source and if we can take advantage of that, it just seems to make a lot of sense. We do have solar here, but it's not necessarily the best area in the country for solar, but it does help and I think of a combination of both solar and wind will provide a healthy environment that will be good for all people.	Section 1.2 of the DEIS included a discussion on the Purpose and Need for the proposed Project; the purpose and need statement in the FEIS is identical to what was presented in the DEIS. In addition, Section A.8.1 in Appendix A of the FEIS provides a description of the potential positive impacts of the proposed Project on air quality and greenhouse gas emissions. The FEIS includes the beneficial impacts of the proposed Project in each resource-specific section in Chapter 3 and Appendix A, as appropriate.
0274-001	Any project of this size will have some local impacts. The Draft Impact Statement identifies those impacts and the steps that are possible to minimize them. But the far greater impact of this project will be the positive contribution that we make to meeting the existential threat posed by climate change. The speed in which our climate is changing and the effects, both those we're feeling now and those that are predicted, are just staggering. Few things could be as important as reducing carbon emissions by moving from fossil fuels to renewable	Section 1.2 of the DEIS included a discussion on the Purpose and Need for the proposed Project; the purpose and need statement in the FEIS is identical to what was presented in the DEIS. In addition, Section A.8.1 in Appendix A of the FEIS provides a description of the potential positive impacts of the proposed Project on air quality and greenhouse gas emissions. The FEIS includes the beneficial impacts of the proposed Project in each resource-specific section in Chapter 3 and Appendix A, as appropriate.

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	energy, and this project will be a huge step in that direction. Any disruption that this project might cause to local interests such as fishing, pales in comparison to the harm that climate change threatens to anyone who makes a living on the ocean or lives near it.	
0274-002	Offshore wind is the renewable energy resource that we have in New England. Other parts of the country have other resources, hydroelectric, geothermal or whatever, but here, offshore wind is it. Dan mentioned solar, I think we're the 35th sunniest state in the Union so we're doing what we can on solar, but it's not like Nevada. If we're going to harness renewable energy, this is the resource we have, offshore wind.	Thank you for your comment.
0274-003	It is significant that this will be the first major offshore wind project in the country. The northeastern seaboard has wonderful wind resources and Massachusetts has the opportunity to lead in developing this economic resource and in becoming the center of a growing high-tech industry. This will generate manufacturing jobs as the turbines are assembled and installed here and it will create local jobs for our island community on Martha's Vineyard where the maintenance and operation will be based. So I think this is a wonderful project. I think you're doing a terrific job of analyzing the impacts and I just hope that you'll keep in mind constantly the tremendous environmental benefits of this project as well as whatever it impacts, other impacts, it may have.	Section 3.4.1 of the DEIS (3.6 of the FEIS) addressed the potential economic effects of the proposed Project. As such, no changes to the FEIS text were warranted.
0275-001	I'm very interested in the larger context that is the cultural, environmental and economic impacts many years in the future. This particular challenge that we face with climate change is something that has developed over a long period of time, will be slow rolling, and the impacts of not acting now will be felt for many years in the future. The year 2018 brought a couple of very interesting high-level results. One of those results is that 1.5-degree sea rise as a result of global climate change. There's a growing consensus that that will be as bad as the 2 degree C limit that we talked about only five years ago. So there's evidence that increasing damage will occur even at 1.5. Now, unfortunately also, it's very clear that we will need to cut our fossil fuel usage by 50 percent by the year 2030 from where we sit today. That is not going to happen without many projects such as the Vineyard Wind Project.	Section 1.2 of the DEIS included a discussion on the Purpose and Need for the proposed Project; the purpose and need statement in the FEIS is identical to what was presented in the DEIS. In addition, Section A.8.1 in Appendix A of the FEIS provides a description of the potential positive impacts of the proposed Project on air quality and greenhouse gas emissions. The FEIS includes the beneficial impacts of the proposed Project in each resource-specific section in Chapter 3 and Appendix A, as appropriate.
0277-001	I'd like to begin by first commending Vineyard Wind for the outreach to the public that they have shown throughout the process. From the beginning when they were scoping out their plan and their proposal, through the commitments that they've made to provide funds to protect the marine environment, to working with the fisheries and to the commitments that they've made economically to the island, in placing the operation and maintenance center here, the training program for that operation and maintenance center that Sam described at the very	Thank you for your comment.

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	beginning of this meeting. They have been a wonderful partner for the island community, for the Cape and islands community, to work with throughout this process.	
0277-002	Secondly, I'd like to point out that while offshore wind is new to the United States and to the Northeast coast, it's a technology and an industry that's been around globally for over 20 years. There are thousands of these turbines out there in the community, in the world. And through the implementation of that industry, there don't seem to be any fatal--there's no evidence of any fatal flaws or any major obstacles that can't be dealt with with proper planning, thoughtful design. And given my faith in Vineyard Winds, as I said in my first point, I have no doubt that Vineyard Wind will respond to your comments and provide the kind of mitigation that's necessary to implement the project.	Thank you for your comment.
0277-003	And finally, the most important point, and as a few of my colleagues have said, and I didn't see it in your beneficial impacts is the big one, right? The ability to mitigate the effects of climate change. As I think you know from the submissions, the 800 megawatts of power from this project is enough energy to power 425,000 homes which represents six percent of the demand in the Commonwealth of Massachusetts for electrical energy. There's only a few ways we can take a big step to combat climate change in the short term and this is one of them. I really like the words of Governor Baker, to take quick and decisive action on climate change. It's something that we really, really need to do. So above all, I encourage you to make sure that we don't drag this process out and we make some quick decisions and move ahead to counter the climate change effects.	Thank you for your comment.
0278-001	As you know, the scientific consensus is that the ocean, atmosphere and terrestrial climate system has already absorbed dangerously large amounts of extra heat, energy and CO2 which is an acid, a weak acid, because of fossil fuel emissions such to that it's probably a tipping point into extreme weather, sea level rise, ocean health, et cetera. So I want to lend my voice to the fact that we cannot afford to wait longer for the transition to renewable offshore wind energy, which is--wind energy is our best option for Massachusetts given its abundance.	Section 1.2 of the DEIS included a discussion on the Purpose and Need for the proposed Project; the purpose and need statement in the FEIS is identical to what was presented in the DEIS. In addition, Section A.8.1 in Appendix A of the FEIS provides a description of the potential positive impacts of the proposed Project on air quality and greenhouse gas emissions. The FEIS includes the beneficial impacts of the proposed Project in each resource-specific section in Chapter 3 and Appendix A, as appropriate.
0279-001	So I want to speak to the not-my-backyard factor, the NIMBY factor which I think tends to be an argument against renewable energy. I am in support of this project, but to detractors, I would like to say that because of our fossil fuel desire in this country, I mean, our energy consumption in this country that's been dependent on fossil fuels for so long, it's been the communities of color and the marginalized communities that have borne the brunt of this, of our energy consumption, in terms of their water quality, their land quality, their air quality from coal plants and things like that. It's way time, I think, that we as a country,	Thank you for your comment.

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	share all the benefits and the risks and hopefully mitigate the problems of any energy system. So, I am in support of this project.	
0279-002	That said, BOEM, B-O-E-M, you guys, and Vineyard Wind, we're watching you. We want you to do this right and we will hold you--we will continue to watch you and we will hold you accountable to our communities, all the communities that are impacted by this environmentally and all the other aspects. So I support you, but I want to say that we're not stopping here, okay?	Thank you for your comment.
0280-001	In 2007, we had a [dramatic] loss of our oak forests here on Martha's Vineyard directly related to climate change effects....we are seeing actively the biological infrastructure of our planet suffering. You can hear every day the horrible news, for instance, of our populations of insects in decline. So we do need to be quick and decisive. The amount of carbon that is the air is driving all these things to happen. So I'm in support of this. We can't get started soon enough.	Section 1.2 of the DEIS included a discussion on the Purpose and Need for the proposed Project; the purpose and need statement in the FEIS is identical to what was presented in the DEIS. In addition, Section A.8.1 in Appendix A of the FEIS provides a description of the potential positive impacts of the proposed Project on air quality and greenhouse gas emissions. The FEIS includes the beneficial impacts of the proposed Project in each resource-specific section in Chapter 3 and Appendix A, as appropriate.
0282-001	I support for many reasons, but for two main reasons, mostly. One is because of the impact of climate change. I strongly agree that we need to do whatever we can to avoid the worst consequences of that.	Thank you for your comment.
0282-002	The other issue is the issue of local benefits. I've been member of Vineyard Power, a director for almost nine years and we have worked tirelessly to make sure that there are local benefits, and with the operations and maintenance facility here, there will be good middle-class of jobs created on the island. This is the one of the poorest counties in the state. You wouldn't know that. There's a lot of cache associated with Martha's Vineyard, but it is one of the poorest counties and families have a real problem here. The children, they think they know everything; they want to get off the island and leave the rock. They leave and then when they realize they don't know everything, they want to come back and then they can't because there's no jobs here. So families end up being split apart and that really shouldn't happen. There should be a way for people to come back and have an opportunity to have a real good-paying job here and that's what I really want to see here.	Section 1.2 of the DEIS included a discussion on the Purpose and Need for the proposed Project; the purpose and need statement in the FEIS is identical to what was presented in the DEIS. In addition, Section A.8.1 in Appendix A of the FEIS provides a description of the potential positive impacts of the proposed Project on air quality and greenhouse gas emissions. The FEIS includes the beneficial impacts of the proposed Project in each resource-specific section in Chapter 3 and Appendix A, as appropriate.
0283-001	It's about time. We've been waiting since mid-2000s for an offshore wind farm. The United States is so far behind, it's an embarrassment to the country. We need to get this rolling not only in the Northeast, but down the whole coast and up the West Coast. We need to get off the fossil fuels. It's just pathetic that we're doing this to ourselves and I really appreciate that you guys are looking as thoroughly as you are, but I think we have to look at how important it is, the benefits just outweigh the negatives so, so greatly.	Thank you for your comment.
0283-002	What I do know is that it's crazy to ship coal from Indonesia to Fall River to burn it to boil water, to spin a turbine and then have that pollute the air when all we	Thank you for your comment.

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	really need to do is put those turbines up and let the wind blow. Let the resource come to us. It's clean energy, it's renewable, we can spend-- it's done all over the world. I've been in the UK and Italy and I've been an installer and trainer for small wind turbines. But, basically, offshore wind is where--you know, we need more energy than just local, little residential turbines and solar panels, you know. The country needs the electricity. There's no question that we're using it. Nukes, coal, and gas are not the way to do it. Bring us some wind power.	
0284-001	So we welcome the footprint of Vineyard Wind and the presence of them for reasons that, of course, have already been stated. One is the positive economic impact of jobs and training of our young people and the environmental impacts which everybody has been talking about.	Thank you for your comment.
0285-001	This timely project was sited after a five-year stakeholder and community engagement process with the federal government which included a broad representation from across Martha's Vineyard. Vineyard Wind has been an accessible, transparent and responsive community partner throughout this process.	Thank you for your comment.
0285-002	The proposed project will supply up to 800 megawatts of carbon-free renewable energy to Massachusetts and that's enough to power six percent of the Commonwealth's overall energy consumption. It's a big part of Massachusetts' commitment to 1,600 megawatts of offshore wind. It's the first utility scale offshore wind project in the U.S. and it's a big step in addressing the greatest existential threat to mankind, climate change.	Thank you for your comment.
0285-003	You will save rate-payers money and boost our economy with new jobs all with little significant adverse environmental impacts. ... It has also committed \$12 million to ensure the offshore wind industry is anchored in Southeastern Massachusetts and will employ local residents. It has already begun an island workforce education and training program for mid-career changers and students at the Martha Vineyard's Regional High School as you heard earlier.	Thank you for your comment.
0285-004	The importance of Vineyard Wind as a means to provide carbon free energy in the Commonwealth cannot be overlooked. With the proposed project, use of gas and electricity generation and the resulted greenhouse gas emissions will be reduced every day. These are necessary, meaningful steps to change our fuel mix to a low carbon mix that contains a significant amount of renewable energy. I hope you will approve the Draft Environmental Impact Statement for Vineyard Wind and their Construction and Operations Plan.	Section 1.2 of the DEIS included a discussion on the Purpose and Need for the proposed Project; the purpose and need statement in the FEIS is identical to what was presented in the DEIS. In addition, Section A.8.1 in Appendix A of the FEIS provides a description of the potential positive impacts of the proposed Project on air quality and greenhouse gas emissions. The FEIS includes the beneficial impacts of the proposed Project in each resource-specific section in Chapter 3 and Appendix A, as appropriate.
0286-001	So I want to endorse the DEIS and urge approval of the project because of its contributions to reducing the adverse effects of climate change. Two recent articles in the news illustrate the immediacy and severity of climate change impacts. Polar bears driven south by the premature break-up of polar ice are now	Section 1.2 of the DEIS included a discussion on the Purpose and Need for the proposed Project; the purpose and need statement in the FEIS is identical to what was presented in the DEIS. In addition, Section A.8.1 in Appendix A of the FEIS provides a description of the potential positive impacts of the proposed Project on

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	<p>marauding Russian islands in the Arctic disrupting community life, threatening children on their way to school and even mauling two residents to death. This phenomenon is the result of the melting polar ice cap which contributes to the steady rise in global sea levels and also to the diminished ability of the ice sheet to reflect the sun's heat back into the atmosphere. I think people in this room will also have heard news reports in the last two days, I think Tim Boland referred to this, of a more than 40 percent decline in the world's insect population that "threatens the collapse of nature" and signals unmistakably the launch of the sixth great extinction. Vineyard Wind addresses one of the chief causes of such calamities, global warming caused in large part by greenhouse gases emitted into the atmosphere.</p>	<p>air quality and greenhouse gas emissions. The FEIS includes the beneficial impacts of the proposed Project in each resource-specific section in Chapter 3 and Appendix A, as appropriate.</p>
0286-002	<p>This project, this Vineyard Wind Project, will achieve over 1.6 million tons of CO2 reductions, that is the equivalent of taking 325,000 cars off the road, along with sizable reductions in nitrous and sulphur dioxides.</p>	<p>Section 1.2 of the DEIS included a discussion on the Purpose and Need for the proposed Project; the purpose and need statement in the FEIS is identical to what was presented in the DEIS. In addition, Section A.8.1 in Appendix A of the FEIS provides a description of the potential positive impacts of the proposed Project on air quality and greenhouse gas emissions. The FEIS includes the beneficial impacts of the proposed Project in each resource-specific section in Chapter 3 and Appendix A, as appropriate.</p>
0286-003	<p>I noticed that environmental justice is one of your criteria. I didn't actually see that addressed in that lengthy report, but maybe I missed it. Nevertheless, I think one of the greatest environmental injustices is that this globe is living under the adverse impact of all of the greenhouse gases spewed into the atmosphere by the sum total of human industry and activity. This project will be a great contribution to environmental justice.</p>	<p>Section 3.4.2 in the DEIS (3.7 in the FEIS) addressed potential environmental justice impacts. As such, no changes to the FEIS text were warranted.</p>
0287-001	<p>I guess my biggest role is as an elected member of the Martha's Vineyard Commission which I don't know if you what that is, but it's a regional planning agency on the island. And we developed an island plan back ten years ago, I guess, now and one of the sections was all about energy. The findings were that the only way we were going to save the island and make things a lot better was to develop renewable energy. So that's on record.</p>	<p>Section 1.2 of the DEIS included a discussion on the Purpose and Need for the proposed Project; the purpose and need statement in the FEIS is identical to what was presented in the DEIS. In addition, Section A.8.1 in Appendix A of the FEIS provides a description of the potential positive impacts of the proposed Project on air quality and greenhouse gas emissions. The FEIS includes the beneficial impacts of the proposed Project in each resource-specific section in Chapter 3 and Appendix A, as appropriate.</p>
0287-002	<p>Also sticking with Martha's Vineyard Commission, we currently have, it hasn't set a date yet, but they've come before one of our committees, that part of their proposal, that part of Vineyard Wind's proposal will pass through the Town of Edgartown, and that's the cable going to the Cape. So there will be a review process for the public to attend here on the island if they have--you know, if they want a smaller venue to express their concerns.</p>	<p>Thank you for your comment.</p>
0287-003	<p>I'm also on the board of the Cape Light Compact which is an organization which is made up of all the island towns and Cape towns and their goal is to reduce the</p>	<p>Thank you for your comment.</p>

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	consumption of energy. And then after that, their goal is to only buy or consume renewable energy. The other group is the Cape and Vineyard Electric Cooperative and their goal is develop renewable energy and they've done a lot of solar projects. So I think this is a great plan. The amount of energy that this is going to produce, it makes--it's going to make a huge difference.	
0288-001	Their job is to study the effects of humans on our estuaries and our estuarine systems and to help translate the results of their science to decision makers and policymakers. And in a conversation I had with her just before I came here tonight, she again said to me that early on in her career, she realized that global warming climate change was one of the primary stressors of the estuaries that support ocean life throughout our entire country, and asked, in particular, that I iterate to you folks that one of the aspects of the pollution that so badly affects our estuaries is nitrogen deposition. And this has only been lightly touched on, but as she spent her decades of work and research trying to work for the environment, this was one of the problems that she saw deeply affecting the estuaries and all of us. The estuaries are our nursery for our fish.	Thank you for your comment.
0289-001	It's a real important project, not only because of the many benefits it produces, but also because of it symbolism for the State of Massachusetts and for the country. We have a lot of wind farms in the Midwest. I've seen them driving through South Dakota, Northern Texas. We don't have any on the East Coast where the bulk of a lot of this carbon is being produced. And I think having a major wind farm now in this country now is really important for everybody to see that and to mobilize the country to start doing something whether it's the Green New Deal or whatever.	Section 1.2 of the DEIS included a discussion on the Purpose and Need for the proposed Project; the purpose and need statement in the FEIS is identical to what was presented in the DEIS. In addition, Section A.8.1 in Appendix A of the FEIS provides a description of the potential positive impacts of the proposed Project on air quality and greenhouse gas emissions. The FEIS includes the beneficial impacts of the proposed Project in each resource-specific section in Chapter 3 and Appendix A, as appropriate.
0289-002	The Cape Light Compact, I sit on the board of the Cape Light Compact along with Richard and others in the room. They stand for economic justice for people in terms of getting energy needs and we have programs that help distribute and make people's homes more energy efficient. And with the existence of this wind farm, we have the possibility of buying and making ourselves 100 percent green and then using these organizations that exist to reach down into the communities and make sure that everybody is sharing in the reduction of carbon.	Section 3.4.1 of the Draft (3.6 of the FEIS) addressed socioeconomics. Section 1.2 of the DEIS included a discussion on the Purpose and Need for the proposed Project; the purpose and need statement in the FEIS is identical to what was presented in the DEIS. In addition, Section A.8.1 in Appendix A of the FEIS provides a description of the potential positive impacts of the proposed Project on air quality and greenhouse gas emissions. The FEIS includes the beneficial impacts of the proposed Project in each resource-specific section in Chapter 3 and Appendix A, as appropriate.
0290-001	And every day, as people already pointed out, we are seeing such direct impacts of global warming and climate change. And the concerns that I've always brought to the table with regard to the development, the plans to develop offshore wind, have to do with community benefits and habitat and impacts on wildlife has been my main focus. And because Vineyard Wind partnered with Vineyard Power, there's been an incredible conduit so that the community has been able to work out community benefits that we've all heard about today and I think that is	Thank you for your comment.

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	a key part of getting support from the community and also having a nexus because of the impacts, whether it's jobs or educational opportunities for young people training, etcetera., and just manning the operations.	
0290-002	But one of those slides that we saw that I wished I could have looked at a little more closely was of the Vineyard Wind Project in the context of the other wind energy areas. And if I'm correct, they've all been through the option process and there are developers poised to go through the process to eventually go to the COP, the Construction and Operations Plan. And when I was writing comments on the COP for this project, one of the things that really struck me was scale. When you look at the wind energy area that Vineyard Wind will be working on to then put up--how many turbines is it? Not quite 800? I mean, excuse me, I said 800, 20 how many?...Like 84 or 24 something like that was the number you guys came up with. But when you actually look at the shape of that on the map, it's about the same size as Martha's Vineyard and then you look at the prospect of the other developers building wind energy facilities and that's going to be a major impact on habitat, on wildlife, on the fishermen. My hope is that you are looking at cumulative impacts. So that really is my biggest concern at this stage is the cumulative impacts of the other projects that are coming down the pipeline.	Chapter 1 and Appendix A of the FEIS have been updated in response to public and stakeholder comments as well as on-going consultation with resource agencies to include additional reasonably foreseeable projects in the analysis, and the methodology presented was included in the SEIS. Additionally, Appendix A has been updated to outline the effects assessment methodology utilized in the development of the document. The appendix also outlines the other potential offshore wind energy projects that are considered reasonably foreseeable. The assessment of impacts is included in each resource-specific section in Chapter 3 and Appendix A.
0290-003	But to get specific [I suggest]...an alternative to pile driving, which disturbs protected species like marine mammals as well as fish and invertebrates, I hope you'll be considering alternatives like gravity based and suction buckets which I think is the preferred technology. Do I need to describe what that is? You guys know what I'm talking about, more or less, it's just... Well, the monopile, the whole process of putting in the foundation for one of the wind turbines creates great disturbance in terms of sound and what-have-you... So if you're doing monopile, it's going to impact marine mammals. If you do the gravity based, which is a cement system, which is not as ideal with a big foundation that will affect the benthic community, the sea bed, and all the species that are there. The better system is the suction buckets because they literally float right above the surface of the sea bed, I understand.	Vineyard Wind's proposed construction methods are described in Section 2.1.1 of the DEIS and FEIS. As such, no change to the FEIS was warranted. Mitigation measures relative to pile driving activities are described in the updated Appendix D of the FEIS. Additional monitoring and mitigation, if required, will be developed in coordination with applicable Federal, State, and local resource agencies and/or other stakeholders. Gravity based suction buckets were not analyzed in the document.
0290-004	So marine mammals like the Right Whale--and I think everybody in this room is aware of the kind of stress that this very rare marine mammal has been under. We're, you know, down to 420, there were no births last year. I think four babies have been spotted this year, but it's pretty dire for the Right Whale. And when you think back to why is it so dire for the Right Whale, it's because when the Europeans showed up, the whale is called the Right Whale because it feeds at the surface and there were so many that they said you could walk across the backs of the Right Whale from Martha's Vineyard to Woods Hole. That's how abundant they were, but because of whale oil and whale hunting, their populations were decimated. So it's ironic that here we are talking about an alternative to oil and	Appendix D of the FEIS has been updated and takes into consideration Vineyard Wind's commitments to mitigate the potential impacts on the North Atlantic right whales, including time-of-year restrictions, use of noise reduction technologies, and monitoring during construction. An updated assessment of these mitigation measures and potential impacts is included in Section 3.4 of the FEIS based on public and stakeholder comments and on-going resource agency consultations. Additional monitoring and mitigation, if required, will be developed in coordination with applicable Federal, State, and local resource agencies and/or other stakeholders.

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	they're under--they'll be under threat by the development of the wind farms [due to pile driving].	
0290-005	The other [suggestion] is, I know that there is awareness that there's got to be--the timing for the piling driving has to be based on the migratory patterns of the North Atlantic Right Whale and there have been adjustments. I think, there needs to be a lot of monitoring to make sure that they're not in the area. I understand that there won't be construction at night because of concerns over the Right Whale, so I'm hopeful that as much mitigation and monitoring can come into play	Appendix D of the FEIS has been updated and takes into consideration Vineyard Wind's commitments to mitigate the potential impacts on the North Atlantic right whales, including time-of-year restrictions, use of noise reduction technologies, and monitoring during construction. An updated assessment of these mitigation measures and potential impacts is included in Section 3.4 of the FEIS based on public and stakeholder comments and on-going resource agency consultations. Additional monitoring and mitigation, if required, will be developed in coordination with applicable Federal, State, and local resource agencies and/or other stakeholders.
0290-006	As this project goes forward, once construction begins based on the EIS being approved, etcetera, and all the other permits, the other concern that I've heard from people in my community is, is there the opportunity to walk back this project if we find that there is, you know, harm to Right Whales. Right Whales, the population is diminishing or there's been a take, how is that going to be approached and addressed?	Appendix D of the FEIS has been updated and takes into consideration Vineyard Wind's commitments to mitigate the potential impacts on the North Atlantic right whales, including time-of-year restrictions, use of noise reduction technologies, and monitoring during construction. An updated assessment of these mitigation measures and potential impacts is included in Section 3.4 of the FEIS based on public and stakeholder comments and on-going resource agency consultations. Additional monitoring and mitigation, if required, will be developed in coordination with applicable Federal, State, and local resource agencies and/or other stakeholders.
0290-007	And that's the other concern I also have is that there have been changes in regulations regarding the Endangered Species Act and the definition of what harassment is, what a take is, what harm is, there are all these other very technical things that I am somewhat aware of and I'm just concerned that we will not have the stewardship that we really need to employ to protect threatened species and just all of the marine life and avian life and bats and insects.	Updated discussions of listed species based on public and stakeholder comments as well as on-going agency consultations are provided in the various biological resource sections within Chapter 3 and Appendix A.8 of the FEIS. In addition, BOEM has prepared Biological Assessments for protected species. The updated Appendix D outlines potential mitigation measures to avoid, minimize, or reduce impacts on these species. Additional monitoring and mitigation measures, if required, will be developed in coordination with the USFWS and NOAA.
0290-008	And then there's also the cultural impacts in terms of the Wampanoag Tribe...	Potential impacts on cultural resources are assessed in Section 3.4.3 of the Draft (Section 3.8 of the FEIS). As such, no changes to the FEIS text were warranted.
0290-009	are you addressing the fact that with such a broad design envelope in terms of the COP, when you talk about alternatives, how do you take into account issues that aren't really addressed by data? Do you see what I'm saying? It's just so hard when you have these different scenarios... You know whether you're going in at Lewis Bay with the cable or to Barnstable.	Alternatives are described in Section 2.1 of the FEIS. Those alternatives carried forward for analysis are discussed in the resource-specific sections within Chapter 3 and Section A.8 in Appendix A. The FEIS has been updated in response to public and stakeholder comments as well as on-going resource agency consultation.
0291-001	This project is so needed at this critical time, a time when we may be able to repair--may be able to repair--the severe damage we have made to our planet through irresponsible use and production of fossil fuels.	Section 1.2 of the DEIS included a discussion on the Purpose and Need for the proposed Project; the purpose and need statement in the FEIS is identical to what was presented in the DEIS. In addition, Section A.8.1 in Appendix A of the FEIS provides a description of the potential positive impacts of the proposed Project on air quality and greenhouse gas emissions. The FEIS includes the beneficial

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		impacts of the proposed Project in each resource-specific section in Chapter 3 and Appendix A, as appropriate.
0291-002	In addition to creating much needed, year-round jobs for this island and it's residents, this project could catapult us to compete with the global initiative to be more sustainable and economically viable. If we do not do this now, we will lose on all fronts. Now is the time for us to act for our families, our present and our future, and that's it.	Section 1.2 of the DEIS included a discussion on the Purpose and Need for the proposed Project; the purpose and need statement in the FEIS is identical to what was presented in the DEIS. In addition, Section A.8.1 in Appendix A of the FEIS provides a description of the potential positive impacts of the proposed Project on air quality and greenhouse gas emissions. The FEIS includes the beneficial impacts of the proposed Project in each resource-specific section in Chapter 3 and Appendix A, as appropriate.
0292-001	So I'm here to support this project because of things I've seen. One is, I moved here from 10,000 feet and when I would come down through the Eisenhower Tunnel into Denver and I would see that smog across the city, that's the same thing I see when I'm flying out of Logan Airport. And so when I hear people saying, we don't want to see windmills, we don't to see windmills, but what they don't realize is that we're in a cloud right now that they just can't see until they get above it or out of it. And so that--I would rather see windmills than the cloud that I see when I'm up flying up in the air.	Section 3.9 of the FEIS provides an updated discussion of the potential visual impacts of the proposed Project. Section A.8.1 in Appendix A of the FEIS provides an updated description of the potential positive impacts of the proposed Project on air quality and greenhouse gas emissions.
0292-002	Fishing, in my lifetime, pretty much almost all the fishing that I know has gone down. There's a few species that have gotten better, but overall, it's gone down. I know this might have some commercial negative impacts, but I will say from a recreational standpoint, I'm very excited about it. I think it might actually be the biggest thing to happen in my lifetime of fishing here. I grew up fishing here and I'm back here fishing for the last decade. I think I keep the lights on in a couple tackle shops. I definitely spend a lot of money at the tackle shops as do a lot of my recreational fishing friends and we're very excited about this project because just one single lobster line out there that's maybe a half-inch in diameter with no marine growth on it, it's amazing the habitat that just that little line creates. I am very excited about the habitat that this is going to create for fish out there. I think it will possibly be the biggest thing in my lifetime to see it change for the better, the fishing in this region.	Section 3.4.4 of the DEIS (Section 3.9 of the FEIS) assessed the potential beneficial impacts on recreational fishing opportunities. As such, no changes to the FEIS were warranted.
0293-001	I really support this project basically for the same reasons everyone else has said tonight. Environmental long term impacts are--sorry, environmental long term benefits, economic benefits, and just from a practical standpoint, we consume a lot of energy. We consume more energy every year across the globe, so we should harness renewable energy whenever we can. And like Roger said, it's right outside and it's windy here all the time.	Thank you for your comment.
0294-001	I'm a commercial fisherman, and we as commercial fisherman...are basically habitat ecologists. We just do it with a different angle and we end up spending more than 200, 250...days out of a year out there. So we end up seeing a lot of	Thank you for your comment.

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	things. We, obviously, have commercial interest, but there's a great deal of life out there that has no affiliation with commercial value. And there's a great deal of ecological wonder going on out there every day. In fact, I just wanted to bring to attention that as we speak, if you have a chance, you can go on the NOAA Right Whale Sighting Advisory System, and if you go on the interactive map, there's currently, right now, ten Right Whales exactly in the lease area...	
0294-002	we, as commercial fishermen see the change in climate and we wholeheartedly believe in green energy, but we want to make sure that--you know, this size and scale of this project is unprecedented in, you know, the globe, especially with we're mostly concerned with the construction phase of the project and the pile driving effects on the whales and the fish and there's a lot of studies that you guys have actually published that show extreme effects of pile driving...that exact area is called the old haddock grounds. If you talk to old timers, that was where a lot of great fishing occurred and it's a reproductive area for them. And the pile driving effects can have a huge effect on those stocks that we've really done a really job of finally rebuilding.	Section 3.10 of the FEIS has been updated in response to public and stakeholder comments as well as on-going consultation with resource agencies; it addresses potential impacts on commercial fisheries. Additionally, Section 3.3 of the FEIS provides updated discussions of the effects of pile driving on fish and invertebrate species. Appendix D has also been updated in the FEIS and outlines potential mitigation measures, including those to avoid, reduce, or minimize impacts on commercial fisheries as well as measures to avoid and minimize adverse effects from pile driving activities. Additional monitoring and mitigation, if required, will be developed in coordination with applicable Federal, State, and local resource agencies and/or other stakeholders.
0294-003	bubble shielding for pile driving which can reduce the acoustic, hydro acoustic, effects on Right Whales and different species of fish. And I know that it's expensive to do the bubble shielding, but I think that given that a Right Whale can hear 1,500 miles under water, it would be the least that we could do for them. A	Appendix D of the FEIS has been updated and takes into consideration Vineyard Wind's commitments to mitigate the potential impacts on the North Atlantic right whales, including time-of-year restrictions, use of noise reduction technologies, and monitoring during construction. An updated assessment of these mitigation measures and potential impacts is included in Section 3.4 of the FEIS based on public and stakeholder comments and on-going resource agency consultations. Additional monitoring and mitigation, if required, will be developed in coordination with applicable Federal, State, and local resource agencies and/or other stakeholders.
0296-001	The first [question]...I have...is a couple of slides back I believe it said minor to moderate on commercial fishing around--down the area. How do you come to minor to moderate? If this thing goes through, which it's going to from what I understand, it's over. I'm a fixed year fisherman and there's (indiscernible) year fishermen down there (indiscernible). You put these windmills in down there, fishing is over down there for numerous different reasons. One is the way we set the gear, by way of the gentleman's agreement, the drivers of the gear boats. We set east and west on the zeros and fives. You guys probably know that. We set on zeros and fives if mobile gear boats come through the middle of there. If they tow east and west everything gets along. So what I'm saying is that's a major impact because it's either the fixed gear guys who fish down there or the mobile gear guys fish down there with the way they're laid out. And we'll probably--you know, you guys are saying now that we're going to be able to continue to work down there. I highly doubt it down the road you people are going to let us fish down there... Nobody's come forward and offered us anything...It's a major	Potential impacts on commercial fisheries are assessed in Section 3.10 of the FEIS, and navigation and vessel traffic impacts are discussed in Section 3.11. Appendix D outlines the mitigation measures that were evaluated to potentially reduce, avoid, or minimize effects. If the COP is approved, BOEM could select mitigation measures outlined in Appendix D as conditions of COP of approval. All of the aforementioned sections of the FEIS have been updated in response to public and stakeholder comments as well as on-going resource agency consultation.

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	<p>impact because we're not going to be able to work down there, you know, with the way these things are laid out. The mobile gear guys and the fixed gear guys are not going to be able to work down there with these towers.</p>	
0296-002	<p>My next question is the way...[the turbines are] laid out, that's a highway for boats going down George's, going down the channel to go scallop fishing. You steam through there at night as it is now it's one thing. If you put however many wind turbines are going to be down there, however far apart they're going to be apart, steaming through there under pristine conditions is going to be hard with just say 800 different targets. Throw in some nasty weather. Throw in an emergency. Is a Coast Guard helicopter going to be able to come down there and pluck us out of the water in the middle of a storm with 800 other targets interfering on their radar? I don't see it... I understand that, but--so if they put a highway through the middle of the wind farm for us to navigate through to come in, you're going to have to go around. If you're fishing south, you're going to have to go around to the southeast parts to get up into that lane.</p>	<p>The FEIS has been updated to addresses coordination with the USCG in Section 3.11. The FEIS addresses the impact of severe weather on navigation in Section 2.3 and Section 3.11.2.</p>
0297-001	<p>Vineyard Wind, LLC is not a local company. It's actually a subsidiary of Iberdrola, and Iberdrola is based in Spain and is one of the largest energy companies in the world. Just to put that into perspective, last year, according to Iberdrola's own website, they made profit last year of 2.3 billion dollars. The reason that number is important to keep in mind is when we start talking about mitigation, whether it's mitigation for fishermen or whether it's mitigation for the Town of Nantucket because as of right now there has been nothing offered to this town by way of mitigation. So just keep that in mind as we start to look at the impacts of the project, how it affects this town and the people who live there. There should be some mitigation offered to you, but so far there hasn't been any.</p>	<p>Appendix D of the FEIS has been updated and provides a listing of the mitigation measures assessed in the resource-specific sections within Chapter 3 and Appendix A. These measures may be selected by BOEM as conditions of COP approval. Additional monitoring and mitigation, if required, will be developed in coordination with applicable Federal, State, and local resource agencies and/or other stakeholders.</p>
0297-002	<p>The second issue I'd like to talk about real quickly relates to cumulative impacts. There was a slide shown a little earlier, but we've also provided everyone, I think everyone, with a copy of a document that's actually from the EIS, and what it shows is that in addition to this project there are two others that have already been issued leases. Bay Wind and Deep Water, those are located to the northwest of Vineyard Wind, and then we just found out today, it's the first I've seen, that two other leasing areas directly to the southeast of Vineyard Wind have now also been issued leases. When you add up all of those windmills together, they create what's known as cumulative impacts. It's basically a forest of wind turbines. It's going to be amazing if you were to fly over it, you will not have seen anything like it. It's probably the largest cluster of those wind turbines anywhere on the eastern seaboard. But what is disconcerting is that the cumulative effect of all of those wind turbines is not discussed in EIS. You can go there and try to figure it out, but they don't talk about it. I could even tell you by looking at the EIS how many wind turbines they're actually expecting from these other projects that are</p>	<p>Chapter 1 and Appendix A of the FEIS have been updated in response to public and stakeholder comments as well as on-going consultation with resource agencies to include additional reasonably foreseeable projects in the analysis, and the methodology presented was included in the SEIS. Additionally, Appendix A has been updated to outline the effects assessment methodology utilized in the development of the document. The appendix also outlines the other potential offshore wind energy projects that are considered reasonably foreseeable. The assessment of impacts is included in each resource-specific section in Chapter 3 and Appendix A.</p>

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	right next door and the gentleman was just talking about the difficulty of navigating a fishing boat through one project, now imagine going through six. That's a fundamental problem with the EIS and that needs to be fixed.	
0297-003	One of the other issues is that the project counts itself as being able to reduce greenhouse gas emissions, that it is somehow going to be part of that way of solving that problem. But in the New York Times and the Washington Post just in the last month, they reported that greenhouse gas emissions in 2018 in the United States actually spiked by 3.4 percent, despite all of the interest and investment in renewable platforms like this one. What they figured out is that with the availability of cheap energy, the economy grew, everybody consumed more and your GHG emissions went through the roof. It's a growth issue. So one of the questions that we all want to be asking, and one of the questions that isn't analyzed in the EIS, is what is the growth inducing impact of this project and the others that are coming right behind it? Because if they're simply adding more energy to the grid that will facilitate more growth, all of these supposed benefits to GHG reductions they're going backward and you will be stuck looking from Madaket out into the ocean seeing these windmills and you're stuck with them for 30 years and you've achieved nothing by way of greenhouse gas reduction. That needs to be analyzed in the EIS and it hasn't been thus far.	Section 1.2 of the DEIS included a discussion on the Purpose and Need for the proposed Project; the purpose and need statement in the FEIS is identical to what was presented in the DEIS. In addition, Section A.8.1 in Appendix A of the FEIS provides a description of the potential positive impacts of the proposed Project on air quality and greenhouse gas emissions. The FEIS includes the beneficial impacts of the proposed Project in each resource-specific section in Chapter 3 and Appendix A, as appropriate.
0298-001	And just to be clear, although the state issued the permit, both Dr. David Pierce as the director of DMM and Secretary Beaton had reservations about the adequacy of both the monitoring and the mitigation plans that are being put forward...	Appendix D of the FEIS has updated the comprehensive list of the monitoring and mitigation proposed for the Project. This appendix has been updated based on new information as well as comments received during the DEIS comment period. Additional monitoring and mitigation, if required, will be developed in coordination with applicable Federal, State, and local resource agencies and/or other stakeholders.
0298-002	we find the DEIS analysis inadequate, and although everyone says they will be doing analysis and monitoring and mitigation, there are no specific programs.	Appendix D of the FEIS provides a comprehensive listing of potential mitigation measures that could be implemented as conditions of COP approval. This appendix has been updated based on public and stakeholder comments as well as on-going resource agency consultation. Additional monitoring and mitigation, if required, will be developed in coordination with applicable Federal, State, and local resource agencies and/or other stakeholders.
0298-003	One of the things we have in a--very lately have found out is that there are a hundred Right Whales in this area that are now residing there year round and we're talking about a construction project that's going to be putting 600 foot projects--600 foot structures, 160 feet into the ground. One Right Whale take will trigger a violation of the Endangered Species Act which will actually--can not only put people that fish in that Rhode Island, Massachusetts area out of business, but it can affect everyone all the way to Maine. The only vehicle for impacts to be rectified from this construction is the Sustainable Fishermen's Act, and the	Section 3.4 of the FEIS has been updated based on public and stakeholder comments, as well as on-going consultation with resources agencies; it analyzes the potential impacts of the proposed Project to marine mammals. BOEM has also consulted with NOAA in preparing a Biological Assessment for the proposed Project. Updated discussions of potential effects to commercial fisheries are addressed in Section 3.10 of the FEIS.

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	Sustainable Fishermen’s Act only holds one community responsible and that’s the fishing community. The fishing community is the one who’s going to have to bear the burden of any negative impacts that this project has. So what we would like to see are definitive answers to our questions and those are things that we’re not getting right now.	
0299-001	...the National Wildlife Federation has advocated for the responsible development of offshore wind power for about ten years now. We believe that climate change is the single greatest threat to wildlife and habitat and that we desperately need to advance clean energy solutions as quickly as responsible development allows and that last part, responsible development, is critical to anything that we could be able to support in line with our--climate change crisis is of course the crisis of worsening species extinction. We don’t believe any development should move forward that could further endanger wildlife and we are confident that offshore wind power can and must be done in a way that protects wildlife throughout ever stage of development, but there are a lot of important details to that.	Section 1.2 of the DEIS included a discussion on the Purpose and Need for the proposed Project; the purpose and need statement in the FEIS is identical to what was presented in the DEIS. In addition, Section A.8.1 in Appendix A of the FEIS provides a description of the potential positive impacts of the proposed Project on air quality and greenhouse gas emissions. The FEIS includes the beneficial impacts of the proposed Project in each resource-specific section in Chapter 3 and Appendix A, as appropriate.
0299-002	we did after about a year of detailed negotiation with Vineyard Wind land in a place of agreement on a Right Whale protection--a set of Right Whale protection measures so that we could actually--a National Wildlife Federation, and I of course should have highlighted this, is in partnership with our colleagues at Conservation Law Foundation and the Natural Resources Defense Counsel, so our three groups working with Vineyard Wind very closely landed on a set of measures that make us comfortable to say that this is a project that could move forward and protect North Atlantic Right Whales every step of the way. It’s the first time that we’ve reached an agreement like this on a utility scale offshore wind project. This is similar to an agreement that we reached regarding the smaller Block Island Wind Farm that enabled us to endorse that project. This is now--it’s now the--this is the first time that we’ve been able to do this for something large scale. And I just really want to highlight the significance of that because as I mentioned at the beginning of my comments, climate change is the single greatest threat to wildlife and habitat. Our solutions need to be at a scale that rises to that challenge. We need to do this and it’s to be able to--to be able to do that, we need to have these agreements like this in. place.	Appendix D of the FEIS has been updated and takes into consideration Vineyard Wind’s commitments to mitigate the potential impacts on the North Atlantic right whales, including time-of-year restrictions, use of noise reduction technologies, and monitoring during construction. An updated assessment of these mitigation measures and potential impacts is included in Section 3.4 of the FEIS based on public and stakeholder comments and on-going resource agency consultations. Additional monitoring and mitigation, if required, will be developed in coordination with applicable Federal, State, and local resource agencies and/or other stakeholders.
0299-003	Vineyard Wind is providing a model [of Right Whale protection measures] that we believe every project following should emulate. This is something that [the National Wildlife Federation is] really proud to point to you as possible and therefore, you know, intend to do this for every project moving forward. Wildlife--you know, wildlife is our middle name. Our endorsement does not come without really serious and significant stipulations and so it’s just we’re very	Appendix D of the FEIS has been updated and takes into consideration Vineyard Wind’s commitments to mitigate the potential impacts on the North Atlantic right whales, including time-of-year restrictions, use of noise reduction technologies, and monitoring during construction. An updated assessment of these mitigation measures and potential impacts is included in Section 3.4 of the FEIS based on public and stakeholder comments and on-going resource agency consultations. Additional monitoring and mitigation, if required, will be developed in

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	proud to say that Vineyard Wind has risen to that and is at a place where we're able to support the project moving forward.	coordination with applicable Federal, State, and local resource agencies and/or other stakeholders.
0300-001	So I asked someone here,...are there any failures and, you know, I got the blank look and you didn't mention one of them. And I think, Bruce, you said that, you know, there are some real experts here, Mr. Bill. Who's the expert on the failure if this thing goes south and do they ever go south? The reason I ask is that I have a friend from Prince Edward Island and he showed me a picture of a motor boat. He's driving along there's 14 or 15 wind turbines up in Prince Edward Island. Only half of them, he said, are running. So I'm not an expert on this, but I talked to someone that I caretake for a house here. She's from Long Island Sound and she said there's a litigation going on regarding offshore wind farms down in Long Island, New York today. So I think there's problems out there and I don't think you've mentioned any of them and I think that's a disservice...	Section 2.1.1 of the DEIS and FEIS provides details regarding operations and maintenance activities associated with the proposed Project. Section 2.3 describes non-routine activities and low probability events. As such, no changes to the FEIS were warranted.
0300-002	If it's cost effective, Bruce, how can it be and if you need any public money for it? You don't have to answer right now, but these are my questions and you can address them. I don't see how it can be cost effective in the middle of the ocean when maybe another alternative site is Otis Air Force Base which is going to be decommissioned and you can put a thousand of them there without impacting the whales, the things, the benthic studies that you did.	The Purposed and Need for the Proposed Action is described in Section 1.2 of the DEIS and FEIS. As such, no changes to the FEIS were warranted An updated discussion of the alternatives considered, and the rationale for considering them for analysis is discussed in Chapter 2 of the FEIS.
0300-003	I would like to know, and you can answer this at another point, is your benthic study for four to five wind farms or just this one, because I think there's a big difference in the impact of that.	The updated Section 3.2 of the FEIS addresses potential impacts on benthic resources of the Proposed Action alone, as well as effects of other reasonably foreseeable environmental trends and planned actions.
0300-004	Competitive. What if it goes wrong? What if some disaster happens? Does the company go bankrupt and we're left watching it wash ashore here or is there a fund to clean it up? That's my concern.	If the COP is approved or approved with modifications, Vineyard Wind would have to submit a bond that would be held by the U.S. government to cover the cost of decommissioning the entire facility. This explanation has been added to Section 2.1.1.3 of the FEIS.
0300-005	Public input is critical. You know, we've got to get some more information, but public input is critical.	Section C.1.3 in Appendix C of the FEIS has been updated and provides a summary of the public input provided during the development of the DEIS and FEIS.
0300-006	Green--I'm all for green. It's not that far long ago, and I know it was solar energy, but we're skeptical. If you're asking for taxpayers money, do you remember Solyndra. Solyndra was 544 million dollars. You couldn't light a lightbulb with the energy it produced. Sun Edison of New York, 11 or somewhere--11.7 billion dollars, another catastrophic failure for alternative energy. It has to make sense. You know, as bad as the greenhouse gas is for our future and the environment is for our future, so isn't the national debt. If you're not asking for public money, then fine. God bless you, you get the full support of everybody here, but I don't think that's the case. Can you do it without public money and how do we mitigate it if there is a problem?	Thank you for your comment.

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0300-007	Is there going to be a resource--is someone going to come out here and answer it [if there's a failure]?	If the COP is approved or approved with modifications, Vineyard Wind would have to submit a bond that would be held by the U.S. government to cover the cost of decommissioning the entire facility. This explanation has been added to Section 2.1.1.3 of the FEIS. In addition, non-routine activities and low probability events are described in Section 2.3.
0300-008	In the terms of mitigation for the commercial fishermen, I feel bad for them, I really do. I'm not a fisherman, but I do love the fish and I think it's a necessary food source and I think it's--you know, it's a--you know, it's something that's been a tradition in this area forever. I think you can go--and I may be wrong, but I think they can go to their tax returns and say you made one dollar every year for the last five years, now we're only making 50 cents, fine, give them 50 cents, but what about the sport fishermen, the people that take out thousands of families from here every summer and can you guarantee that that's not going to be disruptive? And wouldn't--you used to love to come here and watch the (indiscernible). How about the families that come here and go swimming and fish here? What are you going to say to them when there's no fish out there and can you say that for sure that there isn't?	Sections 3.10 and 3.9 of the FEIS have been updated based on public and stakeholder comments as well as on-going resource agency consultation. The updated Appendix D of the FEIS provides a comprehensive list of mitigation measures relative to these resources. The measures outlined in that appendix have been assessed in the resource-specific sections within Chapter 3 and Section A.8 in Appendix A. Additional monitoring and mitigation, if required, will be developed in coordination with applicable Federal, State, and local resource agencies and/or other stakeholders.
0301-001	I just have a concern about basically rates, right, just the actual rate that people pay. I'm just curious as to whether there's just a means by which the public can kind of oversee and have some kind of say as to what we're going to be paying, you know. It would be ideal, right, in a perfect world there would be, instead of a private industry that's just, you know, helping a few stakeholders get houses on Nantucket, have a public utility that does this.	Thank you for your comment.
0301-002	we have the best wind resource in America. One of the very best wind resources in America. Period. Nantucket Sound, it's the best. So it's definitely valuable, and definitely I'm all for offshore wind, I really am. I just hope that there's a little more conversation about just the people of Massachusetts, Rhode Island, just the states that are involved getting their fair share and actually getting reduced, well-reduced rates, that are actually just based on the actual cost of the industry.	Thank you for your comment.
0302-001	So 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 with the least impacts for local rate payers and upon our local community and environment.	Thank you for your comment.
0302-002	We recognize the numerous benefits this project may have, but we do have a few topics of concern, which could potentially impact our local community, economy, and environment. Nantucket's unique appeal is firmly rooted in its historic character and unique environmental characteristics. Any material changes to the visual character of the environment could impact our designation as a national historic landmark. The size and scale of the project withing the view shot	Section 3.8 of the FEIS has been updated based on public and stakeholder comments as well as on-going resource agency consultation to address Nantucket's designation as a historic landmark and addresses potential visual character impacts and mitigation measures. Additionally, consulting parties submitted mitigation proposals for BOEM's consideration during the Section 106 consultation process.

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	of the island is source of concern for the preservation of the island’s character and natural beauty, and we believe this should be further analyzed and considered.	
0302-003	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 as the most environmentally responsible and locally appropriate lighting option. ALDS systems should be the new standard for offshore developments and not the exception. To minimize the daytime visual impacts of the wind turbines, we reiterate the need for the removal of the northern most rows of turbines close to Nantucket shores. This design modification of essentially pushing back the closest, most visible turbines from Nantucket would minimize the adverse visual impacts without reducing the power output potential of the lease area.	ADLS is a mitigation measure that was outlined and analyzed both in the DEIS and FEIS. As such, no changes to the FEIS were warranted. The updated Section 2.1 of the FEIS describes the various alternatives considered, including an alternative to exclude the turbines in the northernmost portion of the proposed Project area.
0302-004	Tourism is the life blood of Nantucket’s economy. Notwithstanding the European experience with wind farms, there are no relevant precedents in the U.S. and certainly not with historic significance of the Nantucket island. We are concerned that this report does not adequately address the impacts on Nantucket’s specific tourism and the potential impacts on our local island economy.	The FEIS has been updated to include additional information related to potential impacts on Nantucket’s tourism and economy as a result of potential impacts on its visual character. The updated Sections 3.6 and 3.9 of the FEIS include supporting information.
0302-005	it’s become increasingly clear that there’s a lack of minimal guidelines or best practice standards established to date for offshore wind projects, especially as it relates to adverse visual impacts upon national and historic landmarks. This project and how it is evaluated and permitted will set the precedent for all future projects off of our southern coast and along the entire Atlantic coast. We are concerned with this project serving as a learning exercise for all other offshore wind projects to follow and placing Nantucket in the unfortunate role of a guinea pig. It is essential that there be consistency in the criteria applied to this project and subsequent future sites.	Mitigation measures that have been updated and evaluated in the FEIS are described in Appendix D. Additional monitoring and mitigation, if required, will be developed in coordination with applicable Federal, State, and local resource agencies and/or other stakeholders.
0302-006	Due to the high cultural and historic sensitivity of the island and its proximity to the development site and cable routes, we insist that best practice criteria be applied however and wherever possible. These would include clear guidelines for visual impact assessments and visual simulations. Requiring the least impact for nighttime lighting systems, such as ALDS. Requiring all wind farms in a specific region to use the same paint color determined to be the most effective and minimizing the visual impacts for specific atmospheric geographical conditions of the lease sites. Establishing a minimum setback standards for land, with specific considerations for historic landmarks and areas with tourism driven economies. And requiring appropriate project mitigation measures to offset the impacts to communities, such as community benefit agreements or offshore wind mitigation trust funds, as are standard in Europe.	Mitigation measures evaluated in the FEIS are described in Appendix D and are assessed in Section 3.4.3 of the DEIS (Section 3.8 of the FEIS) related to historic resources. Additional monitoring and mitigation, if required, will be developed in coordination with applicable Federal, State, and local resource agencies and/or other stakeholders.

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0302-007	we wish to express our [appreciation] to BOEM for the opportunity to comment and for bringing the public hearing process to Nantucket.	Thank you for your comment.
0303-001	I'm interested in what kind of monitoring is going on...I would like to see an independent program with authority to monitor, and I wanted to know how they would inspect the foundations of these towers on the sea bed. And if so, on this independent team I would also like to see marine science biologists, and you did apparently mention engineering. I would like to make sure there's some marine engineers and civil engineers to make sure these things are going to be remaining upright and workable. Then what should follow is a proactive protection that you seem to be marketing with, which I think is great. I mean, you offered something to the Vinyarders or the Rhode Island people like six million dollars, and I thought that was a joke when you're, you know, at 2 billion. A difference between one million and a billion, if a penny were a day, a million is 11.74 days and a billion is 33 years. So when you offer up six million to somebody, I forget who it was, I heard it up here, that's chump change and it's an embarrassment and you should be.	Appendix D in the FEIS provides a comprehensive list of proposed monitoring and mitigation measures proposed for the Project based on public and stakeholder comments as well as on-going resource agency consultation. Additional monitoring and mitigation, if required, will be developed in coordination with applicable Federal, State, and local resource agencies and/or other stakeholders.
0303-002	I want this project to go and I want to make sure that the monitoring system is in tact and uses robots. And if you see something underneath these towers going on, then maybe you put large rocks or small rocks, whatever, some sort of systems that can grow new fish area. I know you're going to have to repair the scars right away, you know, I'm assuming that, after the construction. But all of this is that one time, the installation time. I'm talking about the next 30 or 40 years. So I'm hoping that our government and our environment are being watched for the entire time these are out there, plus their removal time in half a century or whatever it takes, whatever their life is.	Appendix D in the FEIS provides a comprehensive list of proposed monitoring and mitigation measures proposed for the Project based on public and stakeholder comments as well as on-going resource agency consultation. Additional monitoring and mitigation, if required, will be developed in coordination with applicable Federal, State, and local resource agencies and/or other stakeholders.
0303-003	I don't want my government tax dollar paying for...[independent monitoring and turbine inspections]. I want my government to watch us watch you guys. But that two billion is where the money is coming from. You know, this independent group you pay for, not us. And then we go ahead and we monitor it. It may put you in a little bit of a nerve-racking position, but puts everybody, including the environment, in a safer position. And I'm hoping this is part of the process. If it's not, we're going to be picking up the mess and watching it wash ashore. So I'd like to see something of that nature.	Appendix D in the FEIS provides a comprehensive list of proposed monitoring and mitigation measures proposed for the Project based on public and stakeholder comments as well as on-going resource agency consultation. Additional monitoring and mitigation, if required, will be developed in coordination with applicable Federal, State, and local resource agencies and/or other stakeholders.
0304-001	the issue of this offshore project to take place in Nantucket Shoals...is while we got rid of one, I hope this one here is going to be--the Vineyard is going to take care of this one. But that isn't how it works. Everything changed when I heard what some of the speakers had to say. It was kind of alarming. I think it was the second or third projection on the screen, which showed the licensed area for this project, and it was so shocking I nearly--well, I was just really shocked. It was	Section 3.10 of the FEIS has been updated in response to public and stakeholder comments as well on-going consultation with resource agencies; it addresses potential impacts on commercial fisheries. Appendix D has also been updated in the FEIS and outlines potential mitigation measures, including those to avoid, reduce, or minimize impacts on commercial fisheries. Additional monitoring and

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	taking up the entire area of the most pristine fishing habitat, whale hideout, on the eastern seaboard. And I couldn't believe that the project would cover that much area. So my thoughts were while people were speaking, this is really not an offshore project. It's right in the middle or right, you know, in one of the best habitats on the eastern seaboard. And it means that it's going to impact a huge fisheries. The fishery here is unique.	mitigation, if required, will be developed in coordination with applicable Federal, State, and local resource agencies and/or other stakeholders.
0304-002	[there's two ways to install the project]. You either put the pilings in the soil, the turbines, whatever is there, and it's mostly sand. Otherwise, you tether it to the bottom. And I always thought if this project was going to go through you would tether it to the bottom because it could be easily taken back to shore and brought back out again. The other way was pilings going into the sub-floor is really, really dangerous. Somebody already spoke prior to me about the fisheries. But there are also a lot of chemicals that are used in using a piling in the environment, a lot of environment like that. These chemicals are used to stabilize the pilings so that they don't break lose. They break lose because they're vibrating. The height of the piling is critical. And you've got a big turbine going and it really vibrates. Without these stabilizers they would topple over. But the problem is the stabilizers create the chemicals in there and are extremely hazardous to the marine life. Why I know that is we had a situation here on the east side of Nantucket and stabilizer chemicals were used, and they caused massive fish kills. And they just deny that it ever happened. These fisheries are critical to keeping our fisheries healthy.	Section 2.1.1 of the DEIS and FEIS describes Vineyard Wind's proposed construction and installation techniques. Section A.8.2 in Appendix A of the FEIS addresses the potential impacts of the proposed Project on water quality.
0304-003	And where they want to put them is on the National Grid. My question is do you know where the National Grid is? And you probably can't answer that. Well, the National Grid runs from Rhode Island down to just south of (indiscernible) all the way down the eastern seaboard. It's cut off, I don't know exactly, but almost to Florida. And that grid is for offshore wind construction. And that was put out by the federal government 25, 30 years ago when we got offshore wind. You're outside of this. If you decide to go here, you're outside of the grid. And that doesn't make sense. You should be in the grid. The grid starts in Rhode Island. So you could just shift a little way down and you could tie in to the federal grid.	Thank you for your comment.
0304-004	My science trips into Nantucket Sound for 50 years tell me that this habitat here is more amazing than anybody could imagine. And I've watched many, many number of whales come in directly through where you want to be, and the reason is either sickness or of collisions from ships and whatnot. They come in here because it's very quiet. There's no underwater noise that affects them like it does out in the deeper ocean. So protecting these animals is critical.	Thank you for your comment.
0305-001	I'm a wind energy advocate...My primary focus is on CO2 reduction from wind power. I would disagree with the attorney who represents RET. Coal fired power	Section 1.2 of the DEIS included a discussion on the Purpose and Need for the proposed Project; the purpose and need statement in the FEIS is identical to what

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	plants are being shut down all around the United States. Utility companies are continuing to do that primarily as a result of renewable penetration in the grid wind and solar power. There is significant CO2 reduction going on because of that. The Vineyard Wind project displaced upwards of 2 million tons per year of CO2. It would be like taking 350,000 cars off the road.	was presented in the DEIS. In addition, Section A.8.1 in Appendix A of the FEIS provides a description of the potential positive impacts of the proposed Project on air quality and greenhouse gas emissions. The FEIS includes the beneficial impacts of the proposed Project in each resource-specific section in Chapter 3 and Appendix A, as appropriate.
0305-002	Nantucket is on the front line of climate change. We experience more powerful storms, rising sea levels, and coastal flooding. I would say that ocean acidification is a result of warming seas is a very serious problem that would threaten the habitat in the Vineyard Wind project area among other problems, more so than going wind farm there. Cape Wind went down, but I think this project is viable. It would power up to 800,000 homes, generally, 1,000 homes per megawatt.	Section 1.2 of the DEIS included a discussion on the Purpose and Need for the proposed Project; the purpose and need statement in the FEIS is identical to what was presented in the DEIS. In addition, Section A.8.1 in Appendix A of the FEIS provides a description of the potential positive impacts of the proposed Project on air quality and greenhouse gas emissions. The FEIS includes the beneficial impacts of the proposed Project in each resource-specific section in Chapter 3 and Appendix A, as appropriate.
0305-003	If you held your hand out at arm's length on a clear day from the end of Madaket Road here what you would see [of the Project's offshore components] would probably be about half your thumb nail high on the horizon on a clear day, and on a hazy day you wouldn't even see them.	Thank you for your comment.
0305-004	As far as bird impacts, there's no ill effects. Basically, a good rule of thumb is one bird mortality per turbine per year. It would be running about 84 birds per year, if there's 84 turbines, would be killed. To put that in context, pet cats that are allowed to roam outside the United States that kill over one billion song birds.	Section A.8.3 in Appendix A of the FEIS addresses potential impacts on birds.
0305-005	There's no fuel cost for wind power. There's no political supply issues to get oil or coal from the Middle East or anywhere that's unstable. There's zero emissions and zero water use. And the foundations stimulate sea life as artificial reefs, as you mentioned, and they actually improve fishing in the area.	Thank you for your comment.
0305-006	I want to thank BOEM for coming down and listening to us today and for all your hard work on this project.	Thank you for your comment.
0306-001	anytime you alter the Shoals you get unexpected consequences to our shoreline...In just looking at this diagram and this huge area, and the fact that they're 14 miles off but still close enough to see. So I can't imagine that there won't be any impact. I'm also wondering if, I haven't heard anything on addressing...[coastal erosion] tonight, and it certainly a very important part of our environment.	Appendix E of the FEIS has been updated to include additional information on costal erosion.
0306-002	there are organizations who have been working in this area for decades, Woods Hole, and I'm wondering if there has been any consultation with them?	Consultation and Coordination related to the NEPA process is outlined in Appendix C of the FEIS.
0307-001	The recreational fishing that goes on down there. It is some of the best, which is commonly known already. So if and when this thing ever does go through, some part of me has a doubt, this should be made whole. A lot of mitigation should go down, as far as the commercial guys should be taken care of. In the recreational	Appendix D of the DEIS and FEIS address the potential mitigation measures considered. This appendix has been updated based on new information and comments received during the DEIS comment period.

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	part, a lot of mitigation as far as habitat should be established. I believe some of that fund should be forth for that.	
0307-002	One concern we had, talking to a bunch of the local guys, there's part of that if it's decided to take that eastern feed line that comes through the Nantucket Municipal waters, there's not a lot of hard bottom on that north side of Nantucket and just to the west. So right where that cable comes through, if it were to take that route, there's very little of that there. Now, I think a lot of the guys that fish would prefer to see it go right up through (indiscernible) channel, and therefore you wouldn't be disturbing that.	Section 3.10 of the FEIS has been updated in response to public and stakeholder comments as well as on-going consultation with resource agencies; it addresses potential impacts on commercial fisheries, including potential displacement of fishing efforts. Appendix D has also been updated in the FEIS and outlines potential mitigation measures, including those to avoid, reduce, or minimize impacts on commercial fisheries. Vineyard Wind's PDE is described in Section 2.1.1 and Appendix G. The updated Section 3.2 of the FEIS provides an updated discussion of hard bottom habitat based on public and stakeholder comments as well as on-going resource agency consultation.
0308-001	If we do anything in the ocean, I don't think it should be a fixed platform...it's more environmentally friendly to have something that could be removed easily than just to have something that's a fixed platform.	Vineyard Wind's proposed Project is described in Section 2.1.1 of the DEIS and FEIS.
0309-001	We looked at whether three miles, five miles, ten miles, and ultimately, you know, at this distance we found that 80 percent of people that responded to the study, which was about 600 people, found that 14 miles was a good distance to mitigate the visualizations.	Potential visual impacts are addressed in Section 3.4.4 of the DEIS (3.9 of the FEIS).
0309-002	I've really grown up knowing fishing, and ultimately I've seen the biggest impacts on fish my whole life...And that's not because of offshore wind. That's because of over-fishing and climate change. As a community we're founded on whaling. We harvested all the whales all around the ocean. Then we moved on to harvest fish. There were very little fish left. Now we have wind that blows. We know where it is. Let us harvest it. Thank you.	Section 1.2 of the DEIS included a discussion on the Purpose and Need for the proposed Project; the purpose and need statement in the FEIS is identical to what was presented in the DEIS. In addition, Section A.8.1 in Appendix A of the FEIS provides a description of the potential positive impacts of the proposed Project on air quality and greenhouse gas emissions. The FEIS includes the beneficial impacts of the proposed Project in each resource-specific section in Chapter 3 and Appendix A, as appropriate.
0310-001	I believe that these windmills will create a great sport fishing habitat for residential and charter boats to go out and catch and release fish, catch fish that are legal in these areas and will create a nice habitat.	The DEIS addressed recreational fishing in Section 3.4.4 (3.9 of the FEIS). No significant updates have been made to this analysis since the DEIS.
0310-002	I believe the visual effects are going to be very low. It's very far away. We were all the way out there and we could just barely see the clouds over Nantucket. If you go to Steps Beach at nighttime in the summer you can see the lights on Cape Cod easily and clearly. I don't believe a bunch of blinking lights on top of windmills is going to be any more detrimental than that.	Potential visual impacts were addressed in Section 3.4.4 of the DEIS (3.9 of the FEIS). Mitigation measures assessed are included in Appendix D. Additional monitoring and mitigation, if required, will be developed in coordination with applicable Federal, State, and local resource agencies and/or other stakeholders.
0311-001	I didn't hear anything about the transformer. You have to tie into the transformer before it's finally sent on to (indiscernible) either the channel to Cape Cod or you go down Vineyard Sound. Could you explain something about the transformer because it can be as an aircraft carrier.	Section 2.1.1 of the DEIS and FEIS provides information regarding the proposed Project design and facilities, including the onshore cable route and substation as well as the offshore export cable and other facilities. No significant updates to the substation discussion were made in the FEIS.

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0312-001	The most notable or pertinent to the wind farm are the carpenters, millwrights and pile drivers who also make a living, more or less, off of working on the water...[we] are here to welcome or offer opportunities for employment. .. The Local that I belong to or the district, Eastern District Regional Counsel of Millwrights, encompasses 13 states from Maine to the border of Virginia..they're making efforts to be able to supply manpower in the form of carpenters who lay the cable, who grout the cable into the ocean floor, the pile drivers who, you know, set the piles, set the jackets, and the millwrights who install and adjust and maintain the power generation units ourselves.	Section 3.6 of the FEIS has been updated in response to on-going agency consultations and public comment to address the potential impacts on demographics, employment, and economics.
0313-001	you're creating this wall of wind turbines out there that have the potential to put a lot of energy in the water whether it be noise, vibration, the amount of electric current you're calling it, magnetic field, right, over the cables...we just don't know what kind of effect it's going to have on the fish...fish do react to all of those effects that I just spoke of, that has been proven. We have a large migration every year of our fish from state waters that move in from offshore and they would have to pass through this wall or barrier of all that energy.	The potential impacts on finfish as well as commercial fisheries as a result of the proposed Project are addressed in Sections 3.3 and 3.10, respectively, in the FEIS. These sections include information related to potential EMF.
0313-002	we put a lot of effort into trying to manage our fisheries to keep them stable and efficient. We've done that with a lot of work over there years, have sustainable fisheries here in our waters and we don't want to see that go away. There's so many people that rely on it, you know, a lot of families...what you can do to help prevent any negative impact on our fisheries and if there is, if there's some kind of a drop off in our fisheries, whether it be 10, 20, 30, 40, 50 percent, what are you going to do to compensate the people that rely on these fisheries?	Section 3.10 of the FEIS has been updated in response to public and stakeholder comments as well as on-going consultation with resource agencies; it addresses potential impacts on commercial fisheries. Appendix D has also been updated in the FEIS and outlines potential mitigation measures, including those to avoid, reduce, or minimize impacts on commercial fisheries. Additional monitoring and mitigation, if required, will be developed in coordination with applicable Federal, State, and local resource agencies and/or other stakeholders.
0314-001	I work for a seafood processor called Sea Fresh here in Rhode Island, with a dock and galley and a processing plant in Quonset Point. And for every Brian Loftes that doesn't bring us fish, that's one person not bringing us fish. We have a processing facility that is running with over a 100 people, two shifts a day right now. There are a 100 people behind him that aren't going to get work for that day...there is a significant amount of employment here in Rhode Island and in New England that relies on these fishermen to bring us the resource so that we can process it and sell it to our customers...there's no consideration at all for that in the DEIS or for that matter here in Rhode Island...And I think that is grossly under estimating the significance of what potentially could happen here economically and I ask that to be considered.	Section 3.10 of the FEIS has been updated in response to public and stakeholder comments as well as on-going consultation with resource agencies; it addresses potential impacts on commercial fisheries, including potential displacement of fishing efforts. Appendix D has also been updated in the FEIS and outlines potential mitigation measures, including those to avoid, reduce, or minimize impacts on commercial fisheries. Additional monitoring and mitigation, if required, will be developed in coordination with applicable Federal, State, and local resource agencies and/or other stakeholders. Section 3.6 of the FEIS provides an updated discussion of employment opportunities based on public and stakeholder comments.
0314-002	I think the alignment of the wind turbines as they're being set by Vineyard Wind, is going to adversely affect what fishermen are able to harvest...I don't pretend to know whether that's true or not, but...I recognize that if they're impacted, I'm impacted and...hundreds of people behind me.	Thank you for your comment.

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0315-001	We have supported many times the complete removal of all of the equipment when it comes to the decommissioning of this project. This is something we've been mentioning in our support for since the beginning of Vineyard Winds outreach to the fishing community. In the DEIS, it states that cables may be retired in place. For fishing to resume prior to the construction, all obstructions must be removed from the ocean floor or otherwise it's going to create hangs.	Thank you for your comment.
0315-002	For the cable, it states that it plans to be buried five to eight feet. We believe that is a potential to create gear complex [conflicts] and we see that Block Island was buried at least 6 feet deep and that became exposed this summer and caused some issues.	Cable burial is addressed in the updated Section 2.1.1 of the FEIS. An updated discussion of potential impacts on commercial fisheries is in Section 3.10 of the FEIS. In addition, Appendix D includes mitigation measures to avoid, reduce, or minimize impacts, including those associated with cable laying and cable depth/placement. Additional monitoring and mitigation, if required, will be developed in coordination with applicable federal, state, and local resource agencies and/or other stakeholders.
0315-003	The DEIS also states that the removal of rock and concrete mattresses from cable and scowl protection could be viewed as detrimental since it involves removing any hard bottom communities that would have been established over the past 30 years. But also states in the DEIS that Vineyard Wind is supposed to return the ocean floor to the original state and leaving that in there would not restore it, that we should restore it to the original state.	Decommissioning activities are addressed in Section 2.1.1 of the DEIS and FEIS. Section 2.1.1.3 of the DEIS and FEIS states that offshore cables may be retired in place or removed.
0315-004	we also are against any sort of additional structure being put along side the monopiles to create any sort of additional artificial reefs of any sort.	Thank you for your comment.
0315-005	For transit lanes, Vineyard Wind intends to adopt a 2 nautical mile wide transit lane and the fishing industry has been repeatedly supporting 4 nautical miles...We've explained many times that it's a safety issue as far as Vineyard Wind has the layout now. It's not an east/west layout that we support. This is not just a simple choice to not fish in that area, it's a safety and gear conflict issue.	Section 2.1 describes the Proposed Action and Alternatives that are analyzed in the DEIS and FEIS. Potential impacts on navigation are described in Section 3.11. Potential impacts on commercial fisheries are addressed in 3.3.5. These sections have been updated based on public and stakeholder comments as well as on-going resource agency consultation.
0315-006	In the trawl survey it notes that they foresee minor adverse impact as well as minor beneficial impacts on the scientific and research surveys. I've attended several meetings where Science Center Staff has said that the way the layout is now, research vessels would not be able to enter that area. And if research vessels cannot enter that area, that just leads to move scientific uncertainty in stock assessments which only negatively effects the fishing industry. I actually was just listening in on the New England Fishery Council meeting this past month and the director of the Science Center actually said they will not be entering this area.	Section 3.12 of the FEIS has been updated and addresses potential impacts associated with future research and surveys in the WDA.
0315-007	And my last thing is the mitigation and compensation issue. As Chris mentioned, there is a compensation package right now that Vineyard Wind is negotiating with Rhode Island and right now they're only considering fishing vessels. Shore side facilities have been completely left out of that process and you're leaving out a substantial part of the industry that will be negatively affected by this project.	Potential mitigation measures assessed in the FEIS are outlined in Appendix D. These measures have been updated since the DEIS to account for new information and comments received.

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0316-001	BOEM has facilitated a process that has absolutely no interest in preserving the quality of life in coastal New England. They are myopic in their pursuits, overzealous and the entire EIS process is designed to conceal flaws.	Thank you for your comment.
0316-002	There is public concern about safety expressed meeting after meeting after meeting with the wind farm developers..Life safety is a component of any mitigation package with the government. It is understood it has about a \$10 million per life lost effect on mitigation. When you compress the ocean and put more vessels into a smaller space, you will cause there to be more accidents by virtue of this phenomenon.	Section 2.3 of the DEIS and FEIS address non-routine activities and low probability events. As such, no changes to the FEIS were warranted. The Final MARIPARS have been included in the appropriate sections of the FEIS.
0316-003	It is impossible to determine what the long term effects are for the world's largest wind farm. There will be more electricity coursing around the bottom of the ocean there than anywhere on the globe.	Thank you for your comment.
0316-004	You know, our access to fisheries started 40 years ago with the Magnuson Act...It has held up as the gold standard around the globe. Many of the stocks that were beat down years ago have come back stronger than ever. It is implicit in that document that we will have access to them.	Thank you for your comment.
0316-005	BOEM should have standardized the process. They should have said, look, fishermen need to get in and out a mile north and south, put them on latitude and longitude. Vineyard Wind said...We want to keep it going northwest and southeast...People will die there. Not a matter of if, but when.	Thank you for your comment.
0316-006	Also, BOEM has us holding the mortgage on...Vineyard Wind...They're a bad credit risk with a 2 percent probability that they will default over the course of 30 years. So holding their mortgage is not something that interests me very much.	Thank you for your comment.
0316-007	the EIS...does not give any consideration for the fact that you will disrupt a trawl survey. When you disrupt a trawl survey, you compromise the scientific protocol. When you do that, you create an increase in uncertainty. By virtue of the Magnuson Act when you confront uncertainty, you adopt a position of precaution, you lower the quotas. There is no way for us to quantify that.	Section 3.12 of the FEIS has been updated and addresses potential impacts associated with future research and surveys in the WDA.
0317-001	And I've fished decades in this area where this wind farm is proposed, transitted through that area for decades...But my biggest concern with the document is regarding safety...When a vessel gets in this area, and there's bad weather, anything takes place, a rope in the wheel, you lose your power, it's going to be a catastrophe. You know you're going to be ending up drifting through there, the Coast Guard won't be able to get to you with the helicopters....but people are going to die in this wind farm.	Section 2.3 of the DEIS and FEIS address non-routine activities and low probability events. As such, no changes to the FEIS were warranted. The Final MARIPARS have been included in the appropriate sections of the FEIS.
0317-002	initially we were asking for a one mile separation between the lanes and...transit lanes of four miles wide and we didn't get that. Vineyard Wind said no, we can't do that. That's why we're in mitigation today because they would not change the document. They would not work with the fisherman.	Thank you for your comment.

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0317-003	That area where they have these wind farms, Vineyard Wind...the windmills are going to be like 3/8ths of a mile apart, and they're going to be scattered, they're not even going to be in a certain pattern, no vessel is going to be able to transit through that area safely.	Thank you for your comment.
0317-004	I understand all of the fisheries' aspects, we have no idea what's going to take place for that. The negative impacts. I mean, no studies have been done so that's a real crash as far as I'm concerned.	Thank you for your comment.
0317-005	Vineyard Wind says you'll still be able to fish in this area, that's going to be almost impossible. How is a dragger and a lobster fishermen going to fish when wind farms are less than a mile apart...common sense will tell you, anybody's been on the ocean, that's not going to take place. So basically, I think this whole area is going to be excluded from commercial fishing...talk to guys who've been fishing all their life, they're not going to want to fish in there. It's going to be too dangerous. So more consideration has to be taking place in considering the layout of these wind farms. This one here is absolutely ridiculous as far as I'm concerned.	The DEIS addressed potential impacts on commercial fisheries in Section 3.3.5 as well as in Section 3.10 of the FEIS. BOEM does not have the ability to restrict access to or within the WDA.
0318-001	And I'd like to revisit the whole safety issue of traveling through the area back and forth in the winter time. Wind that can pick up, and as far as you sticking within one specific direction going back and forth...you don't have...the advantage of doing so. Going around an area could be an extra three, four, five hours transiting back and forth, and it just it's a huge hazard. And as far as the width of a transit area, I think should just be really thought again to be wider...because we're going to have commercial traffic, recreational traffic and we have weather conditions...	Section 2.3 of the DEIS and FEIS address non-routine activities and low probability events. As such, no changes to the FEIS were warranted. The Final MARIPARS have been included in the appropriate sections of the FEIS.
0319-001	It seems to me that they're being rushed into doing this now, that nothing can be changed.	Thank you for your comment.
0319-002	This is going to be here permanently...Let's do this right. Let's just take our time...Make sure that you have a lane that you can get through, make sure that the spacing is correct, it's not 3/8ths of mile apart, that's ridiculous. I just think some real thought should be put into that.	Section 2.1.4 of the DEIS and Section 2.1.3 in the FEIS outline the Wind Turbine Layout Modification Alternatives that are assessed in the document.
0319-003	The other thing is displacing fishermen. You're going to have guys moving all over the place that aren't going to be able to fish there and that's going to be an effect on all the other guys that fish around this area.	Section 3.10 of the FEIS has been updated in response to public and stakeholder comments as well as input from State and Federal resource agencies and addresses potential impacts on commercial fisheries, including potential displacement of fishing efforts and other potential conflicts. Appendix D has also been updated in the FEIS and outlines potential mitigation measures, including those to avoid, reduce, or minimize impacts on commercial fisheries. Additional monitoring and mitigation, if required, will be developed in coordination with applicable Federal, State, and local resource agencies and/or other stakeholders.

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0319-004	You have to consider what we're going to do to our shore side support businesses.	Sections 3.6 and 3.10 of the of the FEIS addressing the potential shore side effects of the proposed Project were updated based on public and stakeholder comments as well as on-going resource agency consultation
0320-001	We have no idea what the impacts of the EMF are going to be. It will be the largest power coming across the ocean floor with the cables.	The potential impacts on finfish as well as commercial fisheries as a result of the proposed Project are addressed in Sections 3.3 and 3.10, respectively, in the FEIS. These sections have been updated based on comments received, including comments related to potential EMF impacts.
0320-002	There's been no baseline studies done on this particular project for this DEIS as of right now. It's in the BOEM obligations that two years pre-construction baseline projects get done. There's been zero.	Thank you for your comment.
0320-003	The cumulative impacts...There is physically no way to determine what a 1400 square mile wind farm which will be in the next 12 years...what the cumulative impacts will be with 10 years to 12 years of construction going forward at this point. There's no models anywhere in the world that can justify any assumptions and validate them.	BOEM prepared a SEIS that included an expanded planned action analysis, which described the methodology in Chapter 1 and the list of projects considered in Appendix A of the SEIS. Potential impacts are considered as described in Appendix A and in individual resource sections. Additionally, Appendix A has been updated to outline the effects assessment methodology utilized in the development of the document. The appendix also outlines the other potential offshore wind energy projects that are considered reasonably foreseeable. The assessment of impacts is included in each resource-specific section in Chapter 3 and Section A.8 in Appendix A.
0320-004	Mitigation means something has gone wrong in this process. Somebody has to be compensated for a wrong doing. BOEM has done a wrong doing in this process. BOEM, itself, does not have its own mitigation program. We have been forced, if you're a stakeholder and feel that you have a claim, a loss based on these turbine constructions and these wind development areas being established, you have to personally go seek out the construction people, the developers, on your own. There is no mitigation standards that BOEM has set that help anybody collect money. To all the other fishermen...that have been involved in the mitigation process for...a couple of weeks..., you're all included in this mitigation package, shore side facilities, fishermen, recreational people, anybody at all has been included in the offer that has come down to us..They're very assured that there will be no collateral damage because of their turbine constructions. also a note to the fishermen...when you do...put in a claim against the mitigation...fund, you better have some proof that you fished in the area because right now, the only mitigation that's being compensated for is if you are directly standing in the way of a turbine construction, in that exact development area at that moment.	If the COP is approved, the mitigation measures outlined in Appendix D of the FEIS could become conditions of approval. Additional monitoring and mitigation, if required, will be developed in coordination with applicable Federal, State, and local resource agencies and/or other stakeholders.
0320-005	These public comments towards it are all just check marks in a box. A process that's going to proceed no matter what and that about sums me up.	Thank you for your comment.

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0321-001	On the DEIS, is that there are so many flaws, table flaws, wrong numbers, there have been certain concerns and assumptions. I mean, it's just extremely some assumptions. And when somebody asks, you know, and Brian responded that electro magnetic fields, Brian Loftes asked that and you said, well, there's been studies done in Europe. Well, there have and I've been there but you're talking 20, 30, 40 miles of cable. We're talking thousands, thousands of miles. We're lighting up the southeast corridor of Rhode Island and Massachusetts.	Sections 3.1 to 3.5 of the FEIS provide updated discussions of EMF-related impacts on a variety of marine resources including benthic species, fish, marine mammals, and sea turtles (see Sections 3.2, 3.3, 3.4, and 3.5, respectively).
0321-002	We had a tragedy here...beginning of January...We lost a fishing vessel out south of Block Island, the fishing vessel Mistress...my concern is that there were...contributing factors...And I want to know how we're going to deal with them going forward...Make a mayday call, Coast Guard which always does a fabulous job with search and rescue, deployed their assets and they had vessels and they had a helo. When the helo got to the site and recognized the limited visibility, 30 to 40 mile an hour winds, 10, 12, 15 foot seas, and wind turbines, five of them, right close by. That was the contributing factor to abort that helo mission. Now these are people that were tossed in the water and vessel went down. It's not easy to see someone in the water in 10, 12, 15 foot seas. You're only going to glimpse as such, a fraction of a second, that you're going to be able to see them. With aerial, you'll have a much better chance of seeing them, but they had to abort...I want to know how the Coast Guard is working with you in this or anything else in a risk assessment so that we understand and we can make certain that this doesn't happen. That's five turbines, what's going to happen when we got 500 of these turbines out there?...When a vessel goes down and they've got helos and they got same conditions, what will we do then?...they'll bring more assets but those assets will be on the water. So I think that's a very great problem and it needs to be addressed, it needs to be written into this statement...Shutting them down is not going to stop that diameter in that low distance to the water of which they have to get down below, you know, because of limited visibility.	Section 2.3 of the DEIS and FEIS address non-routine activities and low probability events. As such, no changes to the FEIS were warranted. The Final MARIPARS have been included in the appropriate sections of the FEIS.
0322-001	Worked the Mistress case. Understand, you know, we have 11 statutory missions, search and rescue is near and dear to our hearts. That was a tough case for us as well. And we're going to do a search and rescue case study as a result of it. We have a vessel that went down in close proximity to the only wind turbines in the country so it made a lot of sense for us to look at that. So we're evaluating it right now, we're studying it and we'll make all that information available to BOEM and then everyone else.	This comment came from the USCG during a public hearing and the statement references the study conducted related to safety within offshore wind energy facilities.
0323-001	we are in favor of ocean wind as long as the wind farms are developed responsibly in regard to the environment and marine opportunities and habitat...In regard to...the Environmental Impact Statement, we feel that there's not a proper sampling being done with fish species from a recreational perspective before,	Potential mitigation and monitoring measures that could become conditions of COP approval are outlined in Appendix D. Appendix D has been updated in the FEIS to take into consideration new information as well as comments received during the comment period. Additional monitoring and mitigation, if required,

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	during, and after construction. And what we specifically mean by that is that we feel in many areas, in this area, there should be rod and reel surveys done to assess what fish are being impacted and how they're being impacted as well as studies to study pelagic fish.	will be developed in coordination with applicable Federal, State, and local resource agencies and/or other stakeholders.
0323-002	we're advocates of putting additional structure at the base of the turbines that, in fact, could help with the scouring [scouring] plain as well. Because our experience and our memberships' experience is a very positive one with the Block Island Wind Farm. We have found that there have been no adverse effects. In fact, possibly some positive effect on building habitat and fish species. We fish right up along the turbines, right as close as we possibly can get to them and catch fish there. So it's a very positive impact that we feel that if there's more structure, that it will even be more.	The updated Section 3.9 of the FEIS addresses the potential impacts (positive and negative) to recreational fishing activities based on public and stakeholder comments as well as on-going resource agency consultation.
0323-003	This third recommendation that we had...is that we feel that there's a void...there does not seem to be any real coordination....Particularly, you know, considering and I don't have to tell you folks, this is one project, one lease area, there's going to be multiple projects and lease areas...There's no coordination of the fishing effort. There should be some oversight board in New England that is comprised of commercial fishermen, recreational fishermen, and other people that need to be at the table to look at these impacts cumulatively of the various wind farms.	Potential mitigation and monitoring measures that could become conditions of COP approval are outlined in Appendix D. This appendix has been updated since the DEIS based on new information as well as comments received from agencies and the public.
0324-001	I'm a commercial fisherman of Newport, Rhode Island and I own a 70 foot steel offshore lobster/crab long fish vessel...I make an average of 50 trips a year through this area that we're talking about...So for the last 37 years, I've gone through this area approximately 1,650 times...what I do consider myself an expert on is safety...I take it very seriously on my vessel about maintaining a safe vessel and operating it safely. My crew has standing orders on watch to wake me if any vessel gets within 3 miles of my vessel. That's because at 10 knots, two vessels coming at each other, you have minutes to make a decision to safely avoid collision. The way this wind farm is set up with these wind turbines in such close proximity and those lanes so close together, it's going to be--somebody's going to get killed. You're not going to be able to safely navigate through that. It's trip after trip we come through there in the winter time when it's blowing, snow, gale wind, rain, fog...It's not safe and I don't think you should rush this to a conclusion without really considering that fact.	Section 2.3 of the DEIS and FEIS address non-routine activities and low probability events. As such, no changes to the FEIS were warranted. The Final MARIPARS have been included in the appropriate sections of the FEIS.
0326-001	One thing I want to point out is in the DEIS, Page 2.29, there's no proposed port facilities in Rhode Island. So all this job building nonsense isn't going to affect Rhode Island because they don't propose to do anything in Rhode Island..	Thank you for your comment.
0326-002	On Page 2-10, it says Vineyard Wind propose a one nautical mile corridor in a northwest-southeast and northeast- southwest direction and the intent was to develop a two nautical mile wide transit lane that is being developed. That is a	Section 2.1.1.2 of the FEIS has been updated to reflect the latest information related to the demarcated 1-nautical mile corridors within the WDA and the 2-nautical-mile-wide regional navigational safety corridor.

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	discussion that's been had in several workshops, two of them have been in Rhode Island...It also says that that was the intent but if Vineyard Wind and other stakeholders can achieve consensus. The question is what about if not, and that's where we are right now.	
0326-003	And there's been plenty of discussion about the Northeast Fisheries Science Center, they have the...research vessel Bigelow...[which] would [be] permanently excluded from this area and that's because the vessel requires 1.25 nautical mile spacing. And what that means is that the current statistical database that's used to guide our fisheries management is out the window and we're going with it, so that's a huge problem.	Section 3.12 of the FEIS has been updated and addresses potential impacts associated with future research and surveys in the WDA.
0326-004	mitigation is an extremely complicated issue...in this document, it plainly states that the developer who is basically a hedge fund that has about \$8.2 billion in U.S. funds at its disposal, which is Copenhagen Infrastructure Partners, has the right to basically go up against the American small businesses individually. Who's going to win that discussion? You don't even have to guess at that.	Thank you for your comment.
0326-005	Safety is an extreme concern. Radar scatter is a concern. That is addressed in the document, I believe it's listed as a major concern but there are other safety concerns beyond that.	Thank you for your comment.
0326-006	They're also using the Northeast Ocean Data Portal, my favorite thing, they used against us in Monument. It's a piece of junk, you know it. But if you read the disclaimer, it says that that document has to be understood by its users and it cannot be used to determine historical fishing practices, but they used it anyway...the document is corrupt with a lack of detail and short on credible data.	Thank you for your comment.
0326-007	And shore side infrastructure in Rhode Island is a pretty big player. It's not even considered in the document and that's what supports the people in this room and that's a problem not having it in the mix.	Sections 3.6 and 3.10 of the of the FEIS addressing the potential shore side effects of the proposed Project were updated based on public and stakeholder comments as well as on-going resource agency consultation.
0326-008	I certainly appreciate the Coast Guard's involvement, you know, of late and there is also a Coast Guard study that was issued in 2005 that documents the damage to wind farms and transit lanes can do to each other. So that study should be considered in this document as well.	Thank you for your comment.
0327-001	So I hope that we can come up with a compromise so that we can all have a future on this planet together and even more generations to come have a future on this planet. Because at the rate we're going, if we do not get more offshore wind and renewable energy, we absolutely will not.	Thank you for your comment.
0328-001	I listened very carefully at all the safety concerns for the fishermen and that I agree with, no one should die for renewable energy...So also something about climate change is that it is changing the fishing industry itself and that is not getting any better. So I agree that a compromise needs to be made, but we've got to move towards renewable energy.	Thank you for your comment.

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0329-001	I'll say it as an engineer, the concerns about electro magnetic interference with the ocean are largely overstated...I think that's not really a big concern and certainly not to the point where either industry would be negatively impacted significantly by it.	Thank you for your comment.
0329-002	But more broadly, I mean, offshore winds are absolutely necessary part of the transition to renewable energies...So, you know, I mean just looking at energy more generally, there's never a case where we would construct energy infrastructure and it wouldn't have any sort of impact on the world around it.	Thank you for your comment.
0329-003	But at the end of the day, like the choice that we're making is either to invest in the growth and renewable energies and quickly enough to circumvent the worst effects of climate change or suffer the consequences of climate change. So and, I mean, and those consequences are going to include ocean acidification, they're going to include die offs of a huge number of species, and a huge amount of the earth that earth's and the ocean's biomass, you know. So climate change is going to have a much more, a much greater negative impact on a fishing community than wind turbines will	Thank you for your comment.
0330-001	I can't imagine doing anything besides being here advocating for renewable energy...I think it's also important to consider the impacts of climate change on fishermen because how many people...went bankrupt, lost all their equipment in Sandy, and those storms are projected likely only to get worse over time.. I think in this moment, cooperation is definitely crucial because I do understand that there are some safety risks for fishermen and that is something that is serious. But this is, you know, the future of our planet, whether or not we can continue to live on it and I think that there's too much at stake to not come together on this issue.	Thank you for your comment.
0331-001	my children who are 9 and 11 and can't speak for themselves on this issue. And will be the ones who receive the impact if we don't do something about climate change and build more renewable energy resources.	Thank you for your comment.
0331-002	But what I'm struck by in listening to the things today is that the entire context of the process is wrong. It's about a single lease when all the fishermen in the room recognize that the entire region will need to be leased to take advantage of the renewable resources that are there. So we're only looking at one thing and we're also not capturing the benefits that would also apply to the fishermen that live at the coast and have to get out there....So I'm not quite sure how the process gets to change, but you can't continue to look at individual sites and you can't continue to have the fishermen oppose each individual project and get any of this done. So what strikes me is that's why we need an overall picture of how we make some of this stuff happen. There are economic impacts that are broader than a singular project and there are economic benefits to this that mitigation of climate impacts that go out way beyond the realm of the statements	Thank you for your comment.

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0332-001	We have to radically reorganize our lives, each one of us has to, and that includes the fisheries and the wind farm	Thank you for your comment.
0332-002	And I like the idea of looking at the whole grid, not just one at a time.	Thank you for your comment.
0332-003	We need proper space in between the windmills.	Thank you for your comment.
0333-001	National Wildlife Federation has long advocated for the responsible development of offshore wind power. We believe that it's essential that we find a path forward to address the leading threat to wildlife habitat community which is climate change...	Thank you for your comment.
0333-002	We need to advance large scale clean energy solutions and here in the Northeast Region, offshore wind power jumps off the map as truly the only local clean energy solution that can be developed in a way that rises to the scale of the challenge that we face.	Thank you for your comment.
0333-003	And in the case of this project specifically, we're really proud to highlight an agreement that we were able to reach with Vineyard Wind, going through the details of their Construction and Operations Plan with them and negotiating very closely for about a year now on every detail of their project to find a manner in which we could feel comfortable with the development moving forward specifically pertaining to its potential impacts on the critically endangered North Atlantic Right Whale. So the Right Whale migrates up and down the Atlantic Coast and spends time in the area that this project will be developed in is a significant concern to us. Underwater noise, vessel collisions, these are risks that could potentially be increased by offshore wind development. And so by working with Vineyard Wind closely, looking at every step of the development process, we were able to land on an agreement and set some measures in place, Vineyard Wind pro-actively agreed to go above and beyond what's required of them and do things like apply reasonable restrictions to pile driving, ruling out months of the year when we know that whales are most likely to be in the area, apply enhanced monitoring protocols during pile driving and do a physical survey of activities. All of this, of course, is detailed in our comments...Then also reducing vessel speeds during periods of concern to reduce the risk of a vessel collision.	Appendix D of the FEIS has been updated and takes into consideration Vineyard Wind's commitments to mitigate the potential impacts on the North Atlantic right whales, including time-of-year restrictions, use of noise reduction technologies, and monitoring during construction. An updated assessment of these mitigation measures and potential impacts is included in Section 3.4 of the FEIS based on public and stakeholder comments and on-going resource agency consultations. Additional monitoring and mitigation, if required, will be developed in coordination with applicable Federal, State, and local resource agencies and/or other stakeholders.
0333-004	So all of this to say that we're really thrilled to have something to point to, a model that needs to be applied to every project that follows so that we can find a way to develop and fully harness the potential of this really critical clean energy solution, but do it in a way that we could consider truly responsible to our treasured species that occupy the marine environment.	Thank you for your comment.
0334-001	When I went through the reading of the Interior Department's...approval of this lease and all the other leases...Now you can get a lease, no problem, and it's happening...But, you know, what you're laying down is 90 percent of an oil company, a gas company, coming in there and drilling an oil well, fracking for	The offshore wind energy leases off the coast of Rhode Island and Massachusetts are for renewable offshore wind energy. Developers can only submit plans in these areas for development of wind energy.

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	gas...you just laid the ground work for 90 percent of the work for them to just come over to you and apply and try to get oil wells in there which they've been trying to do since the 70s.	
0335-001	The commercial Rhode Island fishery has never put an objection to wind turbines going out in our ocean. Sadly, at this point and it saddens me to say this, I wish we had at the beginning. We've adopted this process. Since the beginning of this process, we were told that we would be able to work with these wind companies and still make a living. We have become evidently collateral damage to wind energy.	Thank you for your comment.
0335-002	I participated in the EMS study with John King, a Ph.D. It's going to disrupt fish...	Thank you for your comment.
0336-001	My two concerns, big one, pile driving. Deepwater Wind, they had a fish kill. First of all, are you protecting and have you fish monitoring?	Section 3.3 of the FEIS provides an updated assessment of potential impacts on finfish, including a discussion of pile driving impacts. Mitigation and monitoring measures, including measures to avoid and minimize impacts resulting from pile driving activities that may become conditions of COP approval are provided in the updated Appendix D. Additional monitoring and mitigation, if required, will be developed in coordination with applicable Federal, State, and local resource agencies and/or other stakeholders.
0336-002	And also are you doing proper hearing protection for the workers? There's something called ototoxicity that causes disorientation, wipes out the equilibrium of not only the critters, but also the people who are pile driving.	Thank you for your comment.
0336-003	You pull up contaminated sediments, you're going to put contaminated sediments into the water, and that's EPA, Army Corps, and there's some concerns I have there.	Section 3.2.2.3 of the DEIS (A.8.2.2 in Appendix A of the FEIS) addressed potential impacts on water quality as well as potential contaminants in sediment. As such, no changes to the FEIS were warranted.
0338-001	If you look at the upcoming 2020 census, you'll find just to the southwest of here, that this is probably one of the highly-depressed communities in the New England region. And so we are adamant about having responses back to us about the processes of being able to participate in the job and employment, career development as well as business utilization for minorities, women and veterans and things of that nature.	Section 3.4.2 of the DEIS and Section 3.7 of the FEIS address environmental justice communities and the potential impacts of the proposed Project to these communities.
0338-002	So we would like to work with Vineyard Wind to put together a benefit agreement that will benefit these neighborhoods that we're talking about. And that's why, again, we intend to make sure that it happens by two methods, either communicating directly with the President of the United States, who said he is willing and able to help the Black community. And as Black folk, we're going to go to the President if we can't get it done here. The only other alternative would be the federal courts. There are laws on the books. There is the 1964 Civil Rights Act, 11246, that provide for affirmative and equal opportunity. There are laws in the books that provide to SBA and agencies like BOEM or others to provide	Section 3.4.2 of the DEIS and Section 3.7 of the FEIS address environmental justice communities and the potential impacts of the proposed Project to these communities. As such, no changes to the FEIS were warranted.

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	business utilization for minorities and women and veterans in our community. And now you're going to say, well, gee, we've had all these meetings, all this kind of stuff. Well, I'm telling you for the most part, we have been left out of that process. They have been exclusionary and on the good-ole-boy network ...	
0338-003	Ask us what we got out of it? And I don't want the people of in the neighborhood to say, oh, Buddy, thanks. My electric bill was only \$8 a month this year. Well, you know, hey, that's nice. That's what this is about, to bring down that cost, to deal with the carbon footprint and deal with climate change and all that stuff. But what good is it if I'm a poor person on a fixed income, welfare and all that stuff and now I've got a \$8 bill for my electric this week. I still can't feed my kids.	Section 3.4.2 of the DEIS (Section 3.7 of the FEIS) addressed environmental justice communities and the potential impacts of the proposed Project to these communities. As such, no changes to the FEIS were warranted. An analysis of electricity rates is outside the scope of a typical NEPA document or is beyond what is necessary to evaluate environmental impacts and mitigation measures.
0338-004	We have all these jobs that we're talking about, and even if it is only 5,000 jobs, if you give us 5, 10, 15, 20, 30 jobs in our neighborhoods, the impact of those jobs will be surmountable. You'll be surprised what the impact will be with those jobs, never mind if you also went out and gave contracts to our minority contractors, and from Providence to Provincetown, we have access to those folks. We need to know who the businessmen, the business women who are going to be looking for employees and we need to know who the employees are. The outreach has to happen, not just go outside somewhere, here in our neighborhoods so we can get the cream of the crop that we have there to bring out to get the vocational training, all of the training that Mass Clean Energy is talking. Bristol Community College is going to be an important partner for us, as well U-Mass Dartmouth as well as Mass. Clean Energy. ... And we have many students there who are college students, Bristol Community College, Bridgewater State University, U-Mass Dartmouth, and we have potential individuals to take these jobs and these business opportunities.	Section 3.6 of the FEIS has been updated to include additional details on demographics, employment, and economics.
0338-005	Give us a chance, invite us to the table. If not, then we'll have to go the other route and now, mind you, we are going to be doing these outreach events from now on, so we want to work with everybody to do it, but we're not satisfied right now with federal government's approach to communicating with us and we're not satisfied totally with the City of New Bedford and their approach with dealing with their own constituents.	Thank you for your comment.
0339-001	We see how the salt water deteriorates on the [steel boats]-- it's probably one of the most harmful environments there is. So what makes everyone think that these wind turbines are going to last a long time and they're not going to ... rot away?	Section 2.1.1 of the DEIS and FEIS provides project description information. Section 2.3 and Appendix E of the FEIS provide additional information related to the resiliency of the proposed Project, particularly related to the project enduring the elements.
0340-001	I would encourage your approval because the enormous environmental positive impacts of sustainable clean power at a very, very affordable price are critical. Many people don't yet, as you do, understand the significance of that wind field off of Massachusetts, and it's just this place on Earth that it's so dynamic that if	Thank you for your comment.

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	we can harness and manage it sustainably and responsibly, then that can really change this whole region in a very positive way.	
0340-002	Coexistence is so important, but sometimes, you know, we get lost in the noise and I want to just introduce a thought about how positive engagement, positive coexistence would work. So there's been a lot of research done in the closed areas in George's Bank, to the scallop industry in particular. I know SMAST did a lot of research that was industry sponsored, and what I think the signs, evidence, was that those areas are closed because of finfish population, not necessarily scallop harvest. And that there would be a way, for example, to responsibly harvest scallops in the closed areas of George's Bank without disrupting the environment in any substantial way. So when the fishermen made that point and argued that point to Marine Fishery Service or others at the federal government, sometimes it sounds self-serving. But I often thought that if the offshore wind advocates, the lease holders and the OEMs recognizing a need and benefit for that kind of advocacy on their part could benefit their new partner in the sea, it turns the political dynamic a little bit around. So I wanted to really, again, encourage you to continue to push the parties to think seriously about the impact of fishermen, mitigate whenever they can...	Thank you for your comment.
0341-001	The National Wildlife Federation has long advocated for the responsible development of offshore wind power. We feel that it is an essential solution to the leading threat to wildlife and habitats, which is climate change, and that advancing large-scale clean energy solutions like offshore wind power is essential to combating that threat. And here in the Northeast, in particular, offshore wind power really jumps off the page as a large-scale resource that's able to truly rise to the scale of the challenges that we face, so we are very committed to find a new path forward for this resource. And when I say that, I mean, finding a responsible development pathway, a pathway that allows us to address the threat of climate change without contributing to the parallel threat of species extinction. And we, of course, have significant concerns on that front with any sort of large-scale development, but truly believe that there is a path forward for a robust and responsible offshore wind industry here off of the Atlantic Coast.	Thank you for your comment.
0341-002	One of the greatest concerns that we have with offshore wind development in the Atlantic is the potential impact to the critically endangered North Atlantic Right Whale. There are fewer than 500 of them in the world today and we truly cannot spare...a single one. Since the submission of Vineyard Wind's COP last year, we spent the remainder of the year working in very close detailed negotiation on their project proposal to find a point of agreement to really land on some proactive measures that Vineyard Wind could take that would allow us to feel comfortable with this project, specifically pertaining to the North Atlantic Right	Appendix D of the FEIS has been updated and takes into consideration Vineyard Wind's commitments to mitigate the potential impacts on the North Atlantic right whales, including time-of-year restrictions, use of noise reduction technologies, and monitoring during construction. An updated assessment of these mitigation measures and potential impacts is included in Section 3.4 of the FEIS based on public and stakeholder comments and on-going resource agency consultations. Additional monitoring and mitigation, if required, will be developed in

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	Whale. ... We were able to reach agreement with Vineyard Wind on a set of proactive measures that the developer could take to allow us to feel comfortable with this project moving forward in that regard. And so the developer, just to quickly summarize, did agree to seasonal restriction on pile driving from January 1st to April 30th, the time that we know the whales are most likely to be in the area, and then for noise-reduction technology to be put to use when that pile driving is occurring. Also to enhance monitoring protocols during pile driving and geophysical surveys, as well as reducing vessel speeds during periods of concern.	coordination with applicable Federal, State, and local resource agencies and/or other stakeholders.
0342-001	I think you had mentioned a 25 percent decrease in energy by 2020. And that couldn't be more important [to] the industry in our area and employment, jobs in our area and training for positions in our area and government research and government monitoring of the project, so that those of us who live in this area who have been supportive of this particular project and the fishing industry and the minority community industry, we need this project, not to develop the process, but involve themselves in the processes of total involvement of our community.	Thank you for your comment.
0342-002	We'd like to make sure that those materials that are being dredged up are being replaced with materials that are either on the shore or come from this shore, so that we know that they're solid, they're materials that we would be comfortable with a wind farm in our area [containing].	Installation methods are addressed in Section 2.1.1 of the DEIS and FEIS. As such, no changes to the FEIS were warranted.
0342-003	And that we have the opportunity to get the training, the placement and the research that the SBA, Vineyard Wind, and some of the state agencies that are involved with you, have applications of minority training, minority placement, minority participation, so that when we look at 2020 and 25 percent, we don't get 5 percent of that 25 percent in our pockets. We want an opportunity for this project, maybe one of the largest wind projects, or the largest project this country has had maybe since the development of the automobile, we want to be a part of that. We want the project to understand what a part of that is... We want to be a part. We want to be one of the major process (Indiscernible.) quickly as possible.	Section 3.4.1 of the DEIS (3.6 of the FEIS) addressed demographics, employment, and economics. As such, no changes to the FEIS were warranted. The implementation of a local hiring plan is outlined in Appendix D and is also assessed in Section 3.6 of the FEIS. The mitigation measures outlined in Appendix D could become conditions of COP approval.
0342-004	We do understand the Jones Act. We understand what brought us the Jones Act and it dictates to us offshore either barge or tugboat people. We understand that those jobs belong to us and we understand that we need to be able to come to these meetings and look at some folks and say, okay, this gentleman is from this particular company, they worked on the project.	Thank you for your comment.
0342-005	We know that it affects our fishing industry and we know that this fishing industry has been the support of our community. We are not going to trade one for the other.	Thank you for your comment.

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0343-001	I believe that the FEIS needs to better incorporate the positive elements of this potential project and I want to just talk specifically about the electric industry. Here in New England, we have between 5 and 9,000 megawatts of old fossil fuel fired power plants and nuclear power plants that are about to retire. We would love to see them replaced with clean power plants like offshore wind. This offshore wind plant can provide many benefits including reduction of greenhouses gas emissions and associated public health benefits and the economic benefits that the state has quantified as \$1.4 billion to the Commonwealth of Massachusetts.	The potential benefits of the proposed Project are included throughout the various resource-specific sections within Chapter 3 and Appendix A. In addition, a summary based on public and stakeholder comments has been added to Section 2.4 that highlights some of the potential benefits of the proposed Project.
0344-001	We have over 250 carpenters in this immediate area, and even if the carpenter himself does not work directly on this project, the pile driver, the millwright or the divers support their health insurance, their pension, their skills upgrade. We'd like to see this be a Union project with Union help. We were a workforce for the Deepwater Wind Block Island farm, and all the constituents that we have here today from this community will stand in support of this project.	Thank you for your comment.
0345-001	we worked very closely with the state, with NEPA being at siting board hearings. And the primary focus, of course, has been the protection of Lewis Bay. But at the same time, we're very discouraged that Vineyard Wind has continued, even though that the Town of Yarmouth has no interest in the project and has refused to sign a host agreement, that they show up still as an alternative to the Covell's Beach landing.	As specified in Section 2.1 of the FEIS, the DEIS and SEIS contemplated two Onshore Export Cable Routes (OECRs), with alternative options within each route; however, since the publication of those documents, Vineyard Wind has stated all necessary state and local permits for the Covell's Beach landfall location have been acquired. Therefore, the Proposed Action (Alternative A) and action alternatives only contemplate the one landfall location, Covell's Beach landfall and onshore route. Alternative B therefore is no longer evaluated as an action alternative in this FEIS. In addition, Section 2.5 of the FEIS has been included to identify the agency-preferred alternative.
0345-002	It's very interesting in this week's Wall Street Journal, they were talking about the decade that Germany has spent with wind and solar power and that, indeed, their carbon emissions are flat even after ten years. That the decrease has not taken place to the degree that they had hoped for. They have now found that the wind power is two-thirds more expensive than fossil fuels and only 29 percent of their power at this time is coming from solar and wind, and that they've had to fall back on coal production to help supplement what they needed for energy needs in the country. They now have the highest energy costs in Europe and one of the things that's been happening for them is their German manufacturing companies have become less competitive and actually their business community and their Chamber of Congress president in Germany have all been commenting on this.	The purpose and need for the proposed Project is described in Section 1.2 of the DEIS and FEIS. As such, no changes to the FEIS were warranted. An analysis of electricity rates is outside the scope of a typical NEPA document or is beyond what is necessary to evaluate environmental impacts and mitigation measures.
0345-003	I think some of the inadequacies of some of the surveys and studies that were done by Vineyard Wind on the protections for these things. As someone who does value the environment and has real concerns about us over the next 25 years,	Appendix D of the FEIS has been updated based on public and stakeholder comments as well as on-going resource agency consultation. The updated Appendix D provides a comprehensive listing of the potential mitigation and

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	what is it that we can look at and what is it we can do to make sure that the protections that need to be in place there, have been raised. The issue has been raised by so many of people around the water on a daily basis.	monitoring requirements that may become conditions of BOEM's approval if the COP is approved. Additional monitoring and mitigation, if required, will be developed in coordination with applicable Federal, State, and local resource agencies and/or other stakeholders.
0346-001	So based on your presentation, it's clear that you're going to approve this project. No one should kid themselves otherwise. This is going to happen. The question is, in your approval, are you going to do the right thing? Are you going to recognize that with offshore wind power, there are going to be losers, that there are U.S. Citizens that are going to be steam-rolled by this project, that there are fishermen that feed this country that are going to be put out of business, that there are small businesses that are going to be displaced, that there are generations of culture that are going to end, or are you going to do the wrong thing and rubber stamp this DEIS despite it's obvious shortcomings and omissions?	Thank you for your comment.
0346-002	This DEIS does not have a mitigation plan for fisherman and stakeholder businesses that are going to be harmed. ..This DEIS does not have a legitimate monitoring plan to determine the impact those turbines and these cables will have on the fish, squid, the cod, the lobsters, striped bass and dozens of other species that migrate through this area. Plain and simple, there is no legitimate monitoring plan. Vineyard Wind has played a game up to this point. They've delayed and delayed the creation of a mitigation plan and a legitimate monitoring plan hoping that they can convince you that they will take care of it later, that you can trust them, that everything will work out fine. It shouldn't work this way. You shouldn't allow a foreign country to run through a project so that they can meet their deadline for tax credits. You need to force them to take care of the U.S. Citizens that will be harmed. You need to force them to put together a legitimate mitigation plan and legitimate monitoring plan.	Mitigation and monitoring requirements that BOEM could require as conditions of COP approval are provided in the updated Appendix D of the FEIS. These measures are analyzed in the resource-specific sections within Chapter 3 and Section A.8 in Appendix A. Additional monitoring and mitigation, if required, will be developed in coordination with applicable Federal, State, and local resource agencies and/or other stakeholders.
0347-001	we strongly support Vineyard Wind's proposed project. Even better than rooftop solar, offshore wind will ensure everyone in the region benefits, low income residents, renters, non-English speakers, those typically shut out of many of the benefits of clean, renewable energy like lower energy costs, closing of dirty fossil fuel burning plants and improved health from low to no greenhouse gas emissions from wind. Wind power has some of the lowest environmental impacts of any source of electricity generation. Unlike conventional sources, wind power significantly reduces carbon emissions and cuts pollution that creates smog and triggers asthma attacks.	Section 1.2 of the DEIS and FEIS address the purpose and need for the proposed Project. Information based on public and stakeholder comments has also been added to Section 2.4 of the FEIS summarizing the potential benefits of the project.
0347-002	New Bedford is designated an environmental justice community and suffers disproportionately from asthma. Vineyard Wind has been engaging with the Southcoast Energy Challenge and other non- profits in the area asking our input and always being available for questions. We believe their transparency and	Thank you for your comment.

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	desire to build up a workforce in this region that includes minorities and women is encouraging and welcomed. We look forward to all the benefits that will come with the Vineyard Wind project and look forward to the acceleration of the offshore wind industry.	
0349-001	we've seen a number of lobstermen across the state and this region most of all, through like, you know, a number of different reasons, but just fully diminished over the years...We, you know, as fishermen, we're independent by nature. We have a hundred- hour work week to begin with, so we don't have extra time to analyze this and to deal with this. And like as previously stated, you said, well, the project was bigger but we reduced it, part of the reason because of the scallop industry. The scallop industry has a big voice, they have money, they have fishery survival fund. You know, as a small owner/operator operations, we don't have those sort of things and as stated previously by another speaker, we will get pushed out of the way because in the big picture, you know, me and maybe 10, 20, 30 lobstermen, that's nothing in the big picture compared to, you know, everybody who wants this so-called clean energy and all this.	Section 3.10 of the FEIS has been updated in response to public and stakeholder comments as well as input from State and Federal resource agencies and addresses potential impacts on commercial fisheries, Appendix D has also been updated in the FEIS and outlines potential mitigation measures, including those to avoid, reduce, or minimize impacts on commercial fisheries. Additional monitoring and mitigation, if required, will be developed in coordination with applicable Federal, State, and local resource agencies and/or other stakeholders.
0349-002	This is not something that's proven and it's not done on anywhere near of a large scale that we would need it to be. You know, when cars first came out and basically, you know, took the place of, you know, horse transportation, everybody thought the car was great. The car was clean energy at one point because can you imagine if everybody rode horses around the city? Well, they had people that had to clean up the city streets because of what the horse produced. So the car came along and the car was great. And if at that time, you got up and you spoke and said, we're going to have a problem with these cars, they produce this CO2 emissions, you would have been laughed out of the room at that time. You didn't even know what it was. So it's like all I'm saying here is, you know, we just better be prepared for whatever impacts this project may have. We don't know and we won't know until it happens, you know.	Thank you for your comment.
0349-003	I know we've done it in Europe, but this is not Europe. We don't have the same species here...Our waters are different, our tides are different, our weather is different. And it's just--I just hope that there is a good, you know, monitoring plan for things and I hope that, yeah, there's some mitigation, but I think--fishermen's mitigation, is that what we really want? No, we want to go fishing. That's what we want to do. Guys are in this industry because we love to go fishing. Yeah, we make money doing it, but that's what--every fishermen in here would rather go fishing than sit at home and collect a check or get compensated in other ways because we can't go fishing because, you know, of any number of different effects of a wind turbine. So it's just--it just scares me when there's a lot of, say, government money or tax credits up for grabs, because it's just--you know, sometimes people with not the best intentions move in and that's what	Appendix D of the DEIS and FEIS outline the potential mitigation and monitoring that BOEM could require as conditions of COP approval. These measures have been updated in the FEIS based on public and stakeholder comments as well as on-going resource agency consultation. These mitigation measures are assessed in the resource-specific sections within Chapter 3 and Appendix A of the FEIS. Additional monitoring and mitigation, if required, will be developed in coordination with applicable Federal, State, and local resource agencies and/or other stakeholders.

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	<p>their eyes are on. They're not here for the long term. They're going to take that money and they're going to put up these turbines and they may well take their money and disappear. And I know that there's a bond and everything to restore the environment, but it just--who knows?...fishermen, you know, we're one of the very vital industries to this area, this city...Vineyard Wind and the rest of these companies, they are foreign-owned and they're operating in our EEZ, our exclusive economic zone. Exclusive for who? Well, apparently, it's not that exclusive.</p>	
0350-001	<p>[The Surf Clam and Ocean Quahog Fishery has] been working furiously to try to have some understanding where we can coexist with the wind energy industry. I have been very disappointed that no matter what the suggestion is made, ... the industry comes back and says, it's too expensive, we can't afford it. Well, with what they intend to do, we can't afford it because they're going to severely negatively impact us.</p>	<p>Thank you for your comment.</p>
0350-002	<p>The prediction is the first time that there is an accident in a wind farm that requires the Coast Guard to try to rescue some vessel or some person in the middle of the night in a storm, they're going to say, this area has to be off limits because we are not going to risk our seamen trying to operate in such a difficult environment. Now, I didn't make that up. I was actually told that ten years ago, that this is going to be a de facto --...So I don't retract my statement at all because, yes, the Coast Guard does not intend to do this, but we are going to have a horrendous safety issue in this.</p>	<p>Section 2.3 of the DEIS and FEIS address non-routine activities and low probability events. As such, no changes to the FEIS were warranted. The Final MARIPARS have been included in the appropriate sections of the FEIS.</p>
0350-003	<p>the scallopers and all the bottom tending mobile gear, are going to have--if these turbines are not spread out a lot more than one nautical mile, and the way they're structured that--or the way that they are laid out is not going to be conducive for being able to fish within the array, and it will just be too dangerous and I am pretty sure that our insurance companies are going to say, we are not going to insure you while you're fishing in the array...The 700 square miles you've now leased off of the Vineyard, Martha's Vineyard, could just be full of scallops in 20 years and not be able to be harvested or we could say, well, this is a big spawning ground and that's going to protect them, that's not the way that this is designed. Then it gets to be a fisheries' management issue --- a science issue and not a wind energy [issue]. ... So you're going to have to have the whole entire power structure still in place.</p>	<p>Section 2.1.3 of the FEIS outlines the wind turbine layout modification alternative, and this alternative is assessed in the resource-specific sections in Chapter 3 and Appendix A. In addition, mitigation and monitoring requirements that could become conditions of COP approval are outlined in Appendix D.</p>
0351-001	<p>I didn't see the impact like what it was going to cost the fleet...Some of your numbers that you had didn't necessarily have the \$5 to \$7 factor that, you know, is generated to the local community from the fish that's landed.</p>	<p>Section 3.10 of the FEIS has been updated in response to public and stakeholder comments as well as on-going consultation with resource agencies; it addresses potential impacts on commercial fisheries, including potential displacement of fishing efforts. Appendix D has also been updated in the FEIS and outlines potential mitigation measures, including those to avoid, reduce, or minimize</p>

Index Number	Comment Text	Response
		impacts on commercial fisheries. Additional monitoring and mitigation, if required, will be developed in coordination with applicable Federal, State, and local resource agencies and/or other stakeholders.
0351-002	one thing I found interesting was that the lease for that bottom was \$150,000 a year, I believe, plus, you know, I guess whatever your royalties are. But it seems that was never offered to the fishing industry and that certainly could have been pennies on the dollar for us to have had access to that bottom or kept access to that bottom.	Thank you for your comment.
0351-003	people are getting tax credits and this is going to happen. So we really don't have any say in what's going to end up being the inevitable thing.	Thank you for your comment.
0351-004	But the cable emissions too. I read some stuff on line about other countries...there's definitely an impact from that. It affects the behavior of the fish...we've had some whales beach themselves since the Block Island one came online	Section 3.2 of the FEIS provides updated discussion of EMF-related impacts on a variety of marine resources including benthic species, fish, marine mammals, and sea turtles (see Sections 3.2, 3.3, 3.4, and 3.5, respectively).
0351-005	...where this is going and where the cables are going is a very rich squid environment which is the only thing that saved the fishing industry in the east coast in the last seven or eight years because of all the regulations. And if that's taken away, that's the end of it because that's what we live and die on is squid. When boats are catching squid, other fish are worth some money and guys can move around and make a living. But if there's no squid, everyone's in the same fishery and nobody's makes out...a good third of our income is from squid, maybe even a little more.	Updated discussions of squid fisheries are provided in Sections 3.2.2, 3.3.1, 3.3.2, 3.10.1, and 3.10.2 of the FEIS. Additional discussion on squid fisheries is provided in the Essential Fish Habitat Assessment, which can be found at the following link: https://www.boem.gov/Vineyard-Wind-Consultation-Documents/ . Mitigation measures relative to squid fisheries are provide in the updated Appendix D of the FEIS.
0351-006	...the average age of the fisherman is over 50 years old. And this is a 30 year lease or 25 year lease. We really don't have much recourse by the time we can prove it and appeal it to get some kind of compensation out of it.	Section 3.10.2 of the FEIS has been revised to include a discussion of displacement and potential conflict over fishing grounds and voluntary compensation. Section 3.10 of the FEIS has been updated to include details of mitigation and monitoring measures relative to commercial fisheries, including voluntary financial compensation. Appendix D of the FEIS has also been updated to include modifications and/or additional mitigation and monitoring measures. These additional mitigation measures could be considered by decision makers and incorporated into the Record of Decision.
0351-007	...we've already witnessed the fleet be consolidated in the last 10 or 15 years by all the regulations that we've already faced and the hardships they put on the fishing industry. Fish houses are buying boats, corporations are buying boats, a big one from Spain just bought a whole sea freeze...it's just another nail in the coffin that's going to end up putting the fishing industry, with the exception of just a few people here and there, but the way we've known it, and I mean, it's been heading that way for a while, this is going to be the end of it.	Thank you for your comment.

K.5. SEIS SUBMISSION AND SUBSTANTIVE COMMENT SUMMARY

K.5.1. Submissions

BOEM received 29,987 submissions from the public, agencies, and other interested groups and stakeholders, as summarized in Table K-6. This total includes unique submissions, as well as variant and non-variant form letter submissions (see Section K.3.1), as summarized in Table K-7. Table K-8 summarizes the types of entities that provided unique submissions (excluding public testimony and form letters).

Table K-6: Total Submissions

Sender Type	Number
Total Submissions on Regulations.gov	13,260
Duplicate submissions excluded (same sender, date, and content as other submission)	(32)
Other submissions excluded (not related to Project, apparent error)	(2)
Public meeting transcripts	(5)
Individual instances of testimony from public meeting transcripts	133
NGO submissions containing multiple individual form letter submissions	(2)
Sierra Club form letter submissions	7,070
National Wildlife Federation form letter submissions	9,563
Total submissions	29,985

Table K-7: Unique, Variant, and Nonvariant Submissions

Submission Type	Number
Unique submissions	614
Public testimony	133
Form Letters	29,238
Nonvariant form letter submissions	26,960
Variant form letter submissions	2,278
Total submissions	29,985

Table K-8: Submissions by Sender Type

Sender Type	Number
Federal agency or representative	5
State agency or representative	13
Local government or representative	9
Tribal government or representative	1
Nongovernmental organization	22
Business representative or organization, including labor	65
General Public	499
Total	614

The totals above included the following submissions by federal, state, local, and tribal government entities:

- Federal:
 - U.S. EPA;
 - U.S. Coast Guard;
 - NOAA Fisheries;
 - Marine Mammal Commission; and
 - Joint letter from U.S. Senators Richard Blumenthal and Christopher S. Murphy and Representatives Jim Himes and John B. Larson;

- State:
 - Massachusetts Office of the Attorney General, Office of Coastal Zone Management, Office of Energy and Environmental Affairs;
 - Rhode Island: Attorney General and Department of Environmental Management;
 - Connecticut: Department of Energy and Environmental Protection, State Senator Dennis Bradley;
 - Joint letter from New York State Departments of State and Environmental Conservation and the New York State Energy Research & Development Authority, in consultation with the New York State Office of Parks, Recreation, and Historic Preservation;
 - Maryland State Senator Katherine Klausmeier;
 - Commonwealth of Virginia Division of Offshore Wind; and
 - North Carolina Department of Environmental Quality;
- Local:
 - Massachusetts: City of New Bedford, Towns of Somerset and Salem, Martha’s Vineyard Commission, and Marblehead Municipal Light Department;
 - City of Bridgeport, CT;
 - Suffolk County, NY; and
 - Town of Ocean City, MD;
- Tribal: state recognized Chappaquiddick-Wampanoag Tribe

The 747 unique submissions and instances of public testimony were reviewed to determine the overall disposition of the provider toward the proposed Project. Resulting dispositions were as follows:

- Pro (generally in favor of the proposed Project): 587 (79 percent);
- Con (generally opposed to the proposed Project): 103 (14 percent); and
- Neutral (no distinct disposition, or disposition could not be clearly determined): 57 (8 percent).

BOEM identified seven form letters that contained repeated language or pre-written text provided by an interest group for submission by individuals. Table K-9 summarizes information on these form letters.

Table K-9: Form Letter Submissions

Form Letter	Nonvariant Submissions	Variant Submissions	Total	Disposition
Business Network for Offshore Wind	46	5	51	Pro
International Brotherhood of Electrical Workers	70	2	72	Pro
Long Island Federation of Labor	278	4	282	Pro
National Wildlife Federation	9,563	0	9,563	Pro
Sierra Club	4,980	2,090	7,070	Pro
Union of Concerned Scientists	11,984	177	12,161	Pro
Unknown (1)	0	23	23	Con
Unknown (2)	0	16	16	Pro
Total	26,921	2,317	29,238	

K.5.2. SEIS Substantive Comments

BOEM identified a total of 3,767 substantive comments. Table K-10 shows the distribution of comments by SEIS section or by topic, where no section was applicable (e.g., general questions about the NEPA process). Because most comments were associated with multiple resources, the number in the Instances² column does not add to

² The instances means the number of times the subject area or section was listed as either the 1st, 2nd, or 3rd subject for the comment. In some cases, the same comment was categorized to more than one subject area of section.

3,767. The most common SEIS section or topic commented on included the Project’s purpose and need, alternatives, employment and economics, and commercial fisheries and for-hire recreational fishing.

Table K-10: Distribution of Substantive Comments by SEIS Section or Topic

SEIS Section	Instances	Percent
Executive Summary	7	<1%
Chapter 1: Purpose and Need	776	21%
Chapter 1: Assessment Methodology, Other Topics	132	4%
Chapter 2: Alternatives	637	17%
Chapter 2: Other Topics	13	<1%
Chapter 3: General	130	3%
Section 3.1: Terrestrial and Coastal Fauna	1	<1%
Section 3.2: Coastal Habitats	11	<1%
Section 3.3: Benthic Resources	40	1%
Section 3.4: Finfish, Invertebrates, and Essential Fish Habitat	133	4%
Section 3.5: Marine Mammals	188	5%
Section 3.6: Sea Turtles	14	<1%
Section 3.7: Demographics, Employment, and Economics	589	16%
Section 3.8: Environmental Justice	54	1%
Section 3.9: Cultural Resources	22	1%
Section 3.10: Recreation and Tourism	90	2%
Section 3.11: Commercial Fisheries and For-Hire Recreational Fishing	348	9%
Section 3.12: Land Use and Coastal Infrastructure	8	<1%
Section 3.13: Navigation and Vessel Traffic	176	5%
Section 3.14: Other Uses	82	2%
Appendix A: General	2	<1%
Section A.8.1: Air Quality	118	3%
Section A.8.2: Water Quality	16	<1%
Section A.8.3: Birds	175	5%
Section A.8.4: Bats	56	1%
Project Description	46	1%
NEPA Process	209	6%
References Suggested	45	1%
Other Substantive Comments	81	2%

Table K-11 lists the name and agency or organization affiliation (if any) for each person who provided a submission during the SEIS comment period. The submission ID corresponds to the Regulations.gov submission ID, as described in Section K.3.3.2 above.

Table K-11: List of SEIS Comments by ID Number

Submission ID	Name	Organization Name
2	Cecelua Pietrusko	
3	Elizabeth Werner	
4	CAPT. GEORGE TOPPING	
5	Rick Cashen	
6	Sharrie Lunser-Woody	
7	Dennis Anonymous	
8	Joshua Dyson	
9	John Majane	
10	Lisa Gundling	
11	Geoff Pohanka	
12	Dan Russell	
13	Callum Doherty	
14	Brian McGowan	
15	Thomas Dameron	Surfside Foods, LLC

Submission ID	Name	Organization Name
16	nancy vogts	
17	sam slabaugh	
18	David Pfau	
19	Anonymous	
20	Daniel Walfield	
21	Carl Borchert	
22	Brian McGowan	
23	Jonathan Barnes	
24	Daniel Huber	
25	Isabel Faherty	
26	Liza Ketchum	
27	Mark Donahue	
28	Kody McCann	
29	Anonymous	
30	David Dow	
31	Anonymous	
32	Linda Lancaster	
33	Matt Levin	
34	Ryan Schneider	
35	William Leavenworth	
36	Anonymous	
37	Ann Rosenkranz	
38	Philip Angell	
39	Lindsay Crouch	
40	Brian Harrington	
41	Anonymous	
42	Edward Bayne	
43	Jan Kubiak Kubiak	
44	Carolyn Solomon	
45	Conrad Geysler	
46	Paul Grund	
47	Steven Kaye	
48	Maureen Francis	
49	Marilyn Miller	
50	Tom Amiro	
51	Suzanne deLesdernier	
52	Rebecca Blathras	
53	Timothy Phillips	
54	Sarah Demb	
55	Dan Tibma	
56	Anonymous	
57	Anonymous	
58	Anonymous	
59	Nicoleta Trandafir	Makeup by Nicoleta
60	Hollyce States	
61	Sarah Hughes	
62	Caleb Merendino	
63	Michael McGarty	
64	Jeanne McNett	
65	Jeremy Welsh-Loveman	
66	Katherine Kohrman	
67	Anonymous	
68	Billy Atwood	
69	John Banks	

Submission ID	Name	Organization Name
70	Graham Cranston	
71	Natalie MacDonald	
72	David Charles	
73	patrick otton	
74	Claire Matthews	
75	Michael Wexler	
76	Richard Payne	
77	Jean Groothuis	
78	Anonymous	
79	Sharon Huttner	
80	JD Rodrigues	
81	Catherine Lucas	
82	John Brazier	
83	Jon Hartzband	
84	Wendy Northcross	Cape Cod Chamber of Commerce
85	NK Acevedo	
86	Roger Schaefer	
87	Kyle Martin	
88	Shelvey Swett	
89	Robert Myers	
90	Bradley Lima	
91	David Dow	
92	David Dow	
93	David Gullette	
94	Frank Borres	
95	Hugh Southall	
96	Patrick Paul	
97	Daniel Hoble	
98	Olivia Gieger	
99	Alan Noguee	
100	Julian Herman	
101	WILLIAM HAMNER	
102	Alyssa Richardson	
103	Alan Field	
104	Virginia de Lima	
105	Julianne Carney	
106	David Stevenson	
107	Sherrie Burson	
108	SUE TENORIO	
109	Joseph Lopes	
110	Abby Del Vecchio	
111	David Newton	
112	David Newton	
113	Janice Newton	
114	Michael Fieleke	
115	Robert Fizek	
116	Allison Pistolessi	
117	Holly Bellebuono	
118	Don Mallinson	
119	Dorothy Savarese	Cape Cod 5
120	Royal Graves	
121	Daniel Zube	
122	John Williams	
123	Fran McDonald	

Submission ID	Name	Organization Name
124	Sally Mavroides	
125	Jada Meadows	
126	Benjamin Wright	
127	Debra DeCosta	
128	Dana DeCosta	
129	David Cole	
130	Matthew Perzanowski	
131	Janice Kubiak	
132	Gleb Bahmutov	
133	Sue Hruby	
134	Ryan Biberon	
135	David Borrus	
136	Robert Rio	AIM
137	Winston Vaughan	
138	Laura-Jean Schwartau	
139	Joel Rinebold	
140	Randall Swanson	
141	Emily Alexander	
142	James Russell	
143	William Campbell	
144	David Mahood	
145	Anonymous	
146	Richard Buck	
147	Theresa Schimmel	
148	James Boyd	Rhode Island Coastal Resources Management Council
149	Stephen Coan	
150	Karen R.	
151	Carol Hautau	
152	Rev. Betsy Sowers	
153	Benjamin Gilsdorf	
154	Steven Wenner	
155	Erika Rusley	
156	Roger Luckmann	
157	george seaver	
158	Katharine Kollins	
159	Sheila Place	350 Cape Cod, and Faith Communities Environmental Network
160	Eric Schiff	
161	William Lake	
162	Jessica Ostfeld	
163	Meg Kerr	Audubon Society of Rhode Island
164	David Downie	
165	Donald Pearson	
166	Don DeBerardino II	F/V UMIAK
167	Elizabeth McLaughlin	
168	Jennifer Kleindienst	
169	Kelly DeVine	
170	Michael Duclos	
171	Alexander Boyle	
172	Jeanette Millard	
174	Nancy Dann	
175	Emery Swanson	
176	Anonymous	
177	MAURICE LEMIEUX	
178	Anonymous	

Submission ID	Name	Organization Name
179	Ben Watson	
180	Esther Tester	
181	Daniel Busi	
182	Ellen Korpi	
183	Kenneth Ayvazian	
184	Kirsten Sauter DVM	
185	Ryan Stanton	
186	Michael Sabitoni	
187	Molly Funk	
188	Lisa Wolf	
189	John O'Keeffe	Ørsted
190	David Hardy	Ørsted
191	Anonymous	
192	Anonymous	
193	John Haran	
194	Senator Julian Cyr	
195	Dennis DiTullio	
196	Jamie Jacquart	
197	Robert Rakovan	
198	Robert Wingrove	
199	Richard Barnes	
200	Gary Harrington	
201	Michelle Willis	
202	Stephanie LaRoche	
203	Deborah Rayner	
204	Fred Zalzman	Ørsted
205	Karon Johnson	
206	Laura Ludwig	
207	Ben Hellerstein	
208	John Haran	
209	David Sauter	
210	Eileen Mathieu	
211	Janine Simmons	
212	Milly Burrows	
213	Marina Petrillo	
214	John Puksta	
215	John Tzimirangas	
216	Anonymous	
217	Audrey Berner	
218	Zenas Crocker	
219	Rebeca Becdach	
220	Jake Lefeber	
221	Susan Morance	
222	Gregory Alper	
223	Chris Ashton	
224	Greg Stawinoga	
225	Chanda Farley	
226	B. Rodriguez	
227	Monte Rogers	
228	Darlene Danko	
229	Barbara Houston	
230	Vijay Sheldan	
231	Debbie Atlas	
232	Caton Gates	

Submission ID	Name	Organization Name
233	Douglas Sedon	
234	Pat Mace	
235	Kate Harder	
236	lois s	
237	Sonia Perez	
238	Robert Gifford	
239	Michael Beasley	
240	Felicity Quartermaine	
241	Catherine McNamara	
242	Teresia LaFleur	
243	Deborah Voves	
244	Jeff Schwefel	
245	Charlene Ferguson	
246	Suzanne Shaffer	
247	Janna Piper	
248	Elyse Schiff	
249	Karin Peck	
250	Marty Crowley	
251	Nick Byrne	
252	Remy Fenster	
253	Gene Hoffman	
254	Kathleen Devitt	
255	Beverly Bullock	
256	Robert Oberdorf	
257	jud woodard	
258	Pat Layden	
259	Robert Brown	
260	Brian Hauprich	
261	Lilly Knuth	
262	Glenn Choy	
263	Steven Bal	
264	Cheryl Trosper	
265	Michael Miller	
266	Kimberly Egan	
267	martin bidney	
268	Diane Smith	
269	Arlene Zuckerman	
270	Steven Gouletas	
271	Lawrence East	
272	Wynn Shafer	
273	Allen Gibas	
274	Sally Kriebel	
275	Carol Goslant	
276	Kent Brauninger	
277	Gary Herwig	
278	Brett Kieslich	
279	Mary Heffernon	
280	Alan Bauer	
281	Vincent Iazzetta	
282	Ivan Irizarry	
283	Tracy Rothstein	
284	Lauranne Lee	
285	Glenn Ducat	
286	Lennette Newell	

Submission ID	Name	Organization Name
287	Mary Anne Morrison	
288	Mark Cappelletta	
289	Mark Guempel	
290	John Teevan	
291	Vijay Sheldan	
292	Carol Lonsdale	
293	marija stroke	
294	Kevin Nguyen	
295	Gerald Wolfe Wolfe	
296	Jane Hardy	
297	Scott Rubel	
298	Alison Date	
299	Buddy Delegal	
300	Miles Ciletti	
301	Marcine McBride	
302	Brandi Frantz	
303	Debbi Coltharp	
304	Beth Darlington	
305	Peter Rogan	
306	Robert Rauh	
307	Jimmy Doty	
308	Travis Malekpour	
309	Mali Henigman	
310	William M. Musser IV	
311	Kevin Lindemann	
312	Carla Wenzlaff	
313	Lisa Barsky	
314	SERENA Nyikes	
315	Cathy Cretser	
316	Michael Hall	
317	Maxine Clark	
318	Roger Salmon	
319	Ryan Davis	
320	Jan Harding	
321	Elaine Larson	
322	Carl Schloetel	
323	Kathy Sugarman	
324	Tom Rolofson	
325	Julie Holtzman	
326	Richard Johnson	
327	J Woodhull	
328	Juliana Arias-Anderson	
329	Kathy Luedtke	
330	Scott Messick	
331	Irvin Lindsey	
332	David Kornreich	
333	Karen Everson	
334	Kathy Guest	
335	Kenneth Bickel	
336	Daniel Salmen	
337	Brooks Obr	
338	Linda Moulder	
339	Georgia Bence	
340	Elizabeth Milliken	

Submission ID	Name	Organization Name
341	Ann Hansen	
342	Janice Hallman	
343	Tom Feldman	
344	Jean Waller	
345	Jim Bungarden	
346	Nadine Godwin	
347	R A Sprague	
348	Cynthia Stewart	
349	Niels Loechell	
350	John D'Avolio	
351	Sara Usher	
352	Juliana Cuevas	
353	Deborah Bishop	
354	Don Thomsen	
355	Jean Citron	
356	Grace Neff	
357	Patricia Brech	
358	Steven Solomon	
359	Diana Parrish	
360	matilda brett	
361	Elaine Holder	
362	Liza Connelly	
363	Howard Stein	
364	Beth Rosenblum Kessinger	
365	Rebecca Rinald	
366	Juan Cortez	
367	Walt Strauch	
368	Greg Page	
369	Lauren Samuels	
370	Vicki Kaplan	
371	Jeffery Morgenthaler	
372	Michelle Wilson	
373	Juan Lossada	
374	William Turnbull	
375	Bill Lindner	
376	Sagar Patel	
377	Kathi Squires	
378	Genevieve Guzman	
379	Eileen McGuinn	
380	J. Nathan McDonnell	
381	Dolores Zieser	
382	Ursula Mass	
383	Daniel Goldberg	
384	Sheila Erlbaum	
385	Diana Lewis	
386	LIDA SKRZYPCZAK	
387	Jessica Koran	
388	Ralf Schuetz	
389	Patrick Christy	
390	David Olson	
391	Kris Thompson	
392	Henrietta Mantooth	
393	Mary E. O'Kiersey	
394	Terry King	

Submission ID	Name	Organization Name
395	Ann Kelly	
396	Jennifer Wittlinger	
397	Alan Helms	
398	James Haggerty	
399	Richard Robinson	
400	Carol Crenshaw	
401	Courtney Weida	
402	Silvano Leyva	
403	Diane Pierce	
404	Kristin Smith	
405	Monica Bonualas	
406	Robert Stuart Stuart	
407	Elizabeth Butler	
408	Mary Alice Keller	
409	Marilyn Mooshie	
410	Merrill Cole	
411	Kathleen Roberts	
412	Sheilagh Bergeron	
413	Chris Smenos	
414	Alexis Grone	
415	Barb Rogers	
416	Michael Ratcliffe	
417	George Barrett III	
418	John Simone	
419	Donald Mason	
420	Nicholas Mouzourakis	
421	Michael Bordenave	
422	Richard Nelson	
423	Sandra Celli	
424	B O'Connell	
425	David Bell	
426	William Cramer	
427	mike white	
428	William McCullough	
429	Wendy Stevens	
430	Charles Wilmoth	
431	Tim Meinke	
432	Alexis Santos	
433	James Carpenter	
434	Elizabeth Barbehenn	
435	RONALD FARRELL	
436	Robert Frank	
437	Monica Greene	
438	Heather Cooper	
439	Debi Larson	
440	joanne maurer	
441	sandra sweetwood	
442	Samuel Newman	
443	Sonja Malmuth	
444	Carsten Bethge	
445	lynne Rpsemfield	
446	Robin Dumler	
447	Louise Krus	
448	MARY SENA	

Submission ID	Name	Organization Name
449	Jamilah Elder	
450	Carolyn Sowdon	
451	Alfred Staab	
452	Dana Baugh	
453	Denee Scribner	
454	Karen Purcell	
455	lynne levine	
456	christine arends	
457	D. Kaye Hall	
458	gerald mantonya	
459	Annie Dawid	
460	Rehana Huq	
461	Janet Petery Dyszel	
462	John Whitlock	
463	Mike Kappus	
464	Lauren Linda	
465	Jered Cargman	
466	Sylvia Vairo	
467	James Corrigan	
468	Claudia Richner	
469	Alice Neuhauser	
470	Bob Merlin	
471	Marc Stein	
472	Nicholas Gillotte	
473	Susan Hood	
474	Amy Zink	
475	Erica Maranowski	
476	John Ferrante	
477	Charlotte Sines	
478	Beth Levin	
479	Theresa Deery	
480	Charles McDonald	
481	Alexandra Wahlstrom	
482	James Jacobs	
483	Patricia Chambers	
484	Doug Cecere	
485	Sheila Lynch	
486	Marcel Liberge	
487	Greta Aul	
488	Ryan McGrath	
489	Lee Perry	
490	Diane Demee-Benoit	
491	Natalie Yushkevich	
492	naomi weisman	
493	Anise Baron	
494	Calvin Jager	
495	Vidya Sivan	
496	Janet Sachs	
497	Dan Zachar	
498	Alan Lopez	
499	Bill Britton	
500	Donna Chavez	
501	karen toscos	
502	Vincent Geiger	

Submission ID	Name	Organization Name
503	Kathy Allison	
504	Maura Kelley	
505	Simmons Buntin	
506	Mara Lopez	
507	Harry Feldman	
508	Mary Beth Davenport	
509	Susan Vogt	
510	George Gaskill	
511	Laura Hoepfner	
512	ted johnson	
513	Jim Messina	
514	Nathaniel Feyma	
515	Jean Stephenson	
516	Charles Carroux	
517	Deborah Honthamer	
518	Vivian Nicely	
519	Thomas Conroy	
520	Neal Umphred	
521	Holiday Houck	
522	Laurie Gogic	
523	Kathleen Aub	
524	Emily Pitner	
525	Melvin Bautista	
526	Richard Mendoza	
527	Jan Stansen	
528	S Berman	
529	Roman Talkowski	
530	Ron Oechsle	
531	Joe Meyer	
532	Dave Ogilvie	
533	Thomas Bretl	
534	Michael Lee	
535	Brenda Bergstrom	
536	Jess Dellinger	
537	Sonja Birdsong	
538	Heinz Wipfler	
539	Brian Waak	
540	Dan Abramovich	
541	Matthew Chojnacki	
542	James Hisle	
543	Jeff Grossman	
544	Joe Brenner	
545	Kathleen Dannemiller	
546	Janet D Carter	
547	James Heald	
548	Elvi Bjorkquist	
549	Hazel Champagne	
550	Craig Guenther	
551	Howard Pflanzner	
552	Nikhil Lucas Kamat	
553	Barbara Blackwood	
554	Lane Page	
555	Cheryl Vana	
556	Joan Diggs	

Submission ID	Name	Organization Name
557	Emma Bradshaw	
558	Christine Jones	
559	LEE JENKINSON	
560	Etta Robin	
561	Paul Allison	
562	Ray Moody	
563	Wende Nelson	
564	Judith Weiler	
565	Sue DiMoia	
566	Julia Bohnen	
567	Sue and John Morris	
568	Paul McCollum	
569	Hannah Banks	
570	Dana Joslyn	
571	Kenneth Martin	
572	William Higgins	
573	Aleks Kosowicz	
574	Todd Atkins	
575	Guy Somers	
576	Christian Heinold	
577	Jordan Tanguay	
578	Linda Brown	
579	Zaira Jones	
580	mary troutt	
581	Andrea Saad	
582	Barbara Harper	
583	Donald Taylor	
584	Joe Brown	
585	James Brooke	
586	Chilton Gregory	
587	Patricia Vondran	
588	Conner Winn	
589	Mike Schneider	
590	Lorrie Underwood	
591	Diane Osgood	
592	A Schultz	
593	James Tashjian	
594	Gregory Penchoen	
595	Cheryl A. Villante	
596	Heiko Mauermann	
597	J Stufflebeam	
598	Geoffrey Mazullo	
599	Madalynn Carey	
600	Alison Buist	
601	Susannah Phillips	
602	E. Neal	
603	Tami Palacky	
604	Jo-Anne Harris	
605	Larry Mills	
606	Agatha Ocko	
607	sherrri hodges	
608	JoAnn McIntosh	
609	M Royce	
610	Lucy Holt	

Submission ID	Name	Organization Name
611	Eleuthera Paulina du Pont-Passigli	
612	Pinkyscout Pan	
613	Michael Laird	
614	Kc Victor	
615	Michael Dutton	
616	Linda Schiffer	
617	Margaret Ullman	
618	Carol Batchelder	
619	Dacia Murphy	
620	Jordan Neiman	
621	Ruth Talley	
622	Dimitri Lefever	
623	Jonathan Harnetiaux	
624	Mark Reback	
625	Charles Jesse	
626	Charlie Cremer	
627	Michael Hacker	
628	Patricia Podboy	
629	Hannah Lange	
630	Daniel McKeighen	
631	Jeanne Stribley	
632	Patience Robbins	
633	Jana Segal	
634	Kathleen Motsinger	
635	William Runkle	
636	Stanley Foodim	
637	David Wengert	
638	Bert Greenberg	
639	Lynne Ann	
640	Dave Cowen	
641	Ilse Burch	
642	Frank Ferguson	
643	Audrey Lazarus	
644	Sandi Hebley	
645	Jan Rose	
646	Christopher Holinger	
647	Allister Layne	
648	Madeline Rhum	
649	Irene Franck	
650	Shannon Griffin	
651	Beatrice Simmonds	
652	Susan Jory	
653	Klaudia Englund	
654	James Pilewski	
655	David Williams	
656	Robert Mammon	
657	Mark Koritz	
658	Brenda Uhler	
659	Tom Johnsen	
660	Robert Kintz	
661	Natasha Tuckett	
662	Bob Gendron	
663	Betty Ferrero	
664	Richard And Janet Wright	

Submission ID	Name	Organization Name
665	Robert Lazzarini	
666	Francisco Silva	
667	Kay Baldwin	
668	Brian Murray	
669	Nina Wouk	
670	Jjames Beeler II	
671	winn wilson	
672	John Keim	
673	Debra Ganshaw	
674	Trishna Goswami	
675	Lynn Krikorian	
676	Ian Ganassi	
677	Paula Everett	
678	cherie garrett	
679	James Talbot	
680	Charles Huddleston	
681	R Wells	
682	Chris Hazynski	
683	Bonnie Thompson	
684	Robert Sala	
685	Nancy Rupp	
686	Susan Stahl	
687	Joy Kroeger-Mappes	
688	Joseph White	
689	Sean Gallagher	
690	Flint Sheffield	
691	Charles Happel	
692	Paul Markillie	
693	Edgar Gehlert	
694	Dr Copas	
695	David O'Neill	
696	Karl Koessel	
697	Ken Barter	
698	Kenneth Schenck	
699	Cathy Delia	
700	Robert Clemens	
701	Elliot Beneroff	
702	David And Carol Butler	
703	Grace Willard	
704	Michael Tucker	
705	Suzann Rosenberger	
706	Susan Proietta	
707	Mark McQuitty	
708	Roger Akeley	
709	Nicole Gallo	
710	Greg Dinger	
711	kaye adkins	
712	Jean Garren	
713	Susan Kiplinger	
714	Taylor Smith	
715	Sara King	
716	V. Rough	
717	Nikki Vandergrinten	
718	Charles Tetoni	

Submission ID	Name	Organization Name
719	Barbara Covelli	
720	Carolyn Latierra	
721	Stephanie Jones	
722	Andy Lynn	
723	Karen Stacey	
724	Kara Huberman	
725	Cindy Lance	
726	Darlene Lardiere-Grison	
727	Corinne Mahaffey	
728	Deborah Barnes	
729	Kenneth Rosenblad	
730	John Peterson	
731	Drew Pelton	
732	Barbara Elias	
733	Helen Goldstein	
734	Diane Hanson	
735	Robert Worrall	
736	Gerard Marini	
737	Norman W Lathrop	
738	Roberta Vandegriff	
739	Robert Jehn	
740	Robyn Class	
741	K V	
742	Doug Arioli	
743	Chuck Aragon	
744	Glenn Martin	
745	Janice Brown	
746	Caroline Bergdolt	
747	Judith Ramirez	
748	Mark Daniels	
749	Laura Aurilio	
750	Jack Lancellotta	
751	William Smart	
752	Tom Wilson	
753	Shelley Abbate	
754	Peter Breyfogle	
755	Sandi Redman	
756	Steven Coomer	
757	R Austin	
758	Alex Savory	
759	Michael Webb	
760	Patti Kenney	
761	Karen Genest	
762	R Patrick Corbin	
763	Maria Pinto	
764	ben nitzan	
765	Tom Schwegler	
766	Elizabeth Enright	
767	Teresa Wrightson	
768	Vittorio Tedesco Zammarano	
769	Donald Meserole	
770	Steve Graff	
771	Sylvia Shortt	
772	Virginia Sharkey	

Submission ID	Name	Organization Name
773	Alek Williams	
774	Robert Shippee	
775	Earl Grove	
776	Sarah Hunnewell	
777	Peter Evans	
778	Albert Calderon	
779	Shennel Church	
780	Coree Spencer	
781	Donald Walsh	
782	Igor Tandetnik	
783	Eleanor Jones	
784	Cathleen Burns	
785	Pam Elders	
786	Brian Inouye	
787	Alan Shulman	
788	Mary K	
789	Alexander Fierro-Clarke	
790	Cathryn Sakiyama	
791	Eric Uhrhane	
792	Karen Christiansen	
793	Ingrid Varnell	
794	Liz Learmont	
795	Charles Bailey	
796	Sherry Costa	
797	Kristin Hagberg	
798	Blaze Bhence	
799	Jan McKim	
800	Gideon Yuval	
801	Pat Dufau	
802	Brandon Cooke	
803	Liz Dyer	
804	Lisa Coolidge	
805	JENNIFER YACIO	
806	Joseph Gulas	
807	Barry Cutler	
808	jane Cadwallader	
809	CLIFFORD CAMPEN	
810	holly smallwood	
811	Susan Margot Ecker	
812	Sue Safford	
813	Daviann McClurg	
814	Kate Skolnick	
815	Kim Kokett	
816	Melissa Norman	
817	BRITTNY CALLENDER	
818	Ree Whitford	
819	Dennis Hough	
820	Rick Andrews	
821	Roberta Peel	
822	Thomas Oneal	
823	Adrienne Ross	
824	Timothy Bruck	
825	Carole Childs	
826	Stephen Garratt	

Submission ID	Name	Organization Name
827	Linda Martinez	
828	Mary Anne Fratelli	
829	Rosalie Stefanich	
830	Julie Medlin	
831	Glen Kappy	
832	Carol Monson	
833	David Gebauer	
834	Steve Schatz	
835	Lillian Nordin	
836	Larry Dinger	
837	Laurrie Cozza	
838	jinx gollam	
839	Robert Cronin	
840	Rachel Fredericks	
841	Leila Baroody	
842	Jan Hall	
843	Sunil Misra	
844	William Davidson	
845	E Renee Inman	
846	Mark Walton	
847	Bret Miller	
848	Eleanor Anderson-Miles	
849	Noah Ehler	
850	Katherine Johnson	
851	Peter Roche	
852	Lyn Z Page	
853	Hill Blackett III	
854	vanessa Smith	
855	John Hammel	
856	Leigh Steele	
857	Peter Roche	
858	Scott Wolf	
859	Jane Ralph	
860	Mark Hayduke Grenard	
861	Eric Polczynski	
862	Carolyn Ryan	
863	Brooke Reel	
864	David Nettleton	
865	Frank Fojtik	
866	Craig Evans	
867	Judith Hudson	
868	Ted Fishman	
869	Mike Stevens	
870	Elaine Levine	
871	David Christian	
872	Enrique Baloyra	
873	EDITH CARDIFF	
874	James Davis	
875	David Walker	
876	Edgar Adams	
877	Patti Blevins	
878	Karen Sanguinetti	
879	Mike Vanlandingham	
880	Andy Lynn	

Submission ID	Name	Organization Name
881	Jeffrey Deal	
882	Valerie Rounds-Atkinson	
883	K D	
884	W. Andrew Stover	
885	Rebecca Wilson-Loots	
886	Linda Anderson	
887	Dawn Kuznkowski	
888	Madeline Vonderlinden	
889	Janice Hughes	
890	Michael Owen	
891	Barbara Matz	
892	ANDREA AMARI	
893	Christopher Sirek	
894	Nancy Glynn	
895	William Kennedy	
896	Michael Halloran	
897	Shaun-Adrin Chofl	
898	Dana Linder	
899	Byron Brown	
900	Juli Kring	
901	Ann Kaslow	
902	Kathryn Burns	
903	Richard Bachman	
904	David Schneider	
905	Donald Wilson	
906	Kathy Bungarz	
907	Sara Avery	
908	Dennis Thompson	
909	Joel Shoner	
910	Larry Rolfe	
911	Erich Freimuth Jr	
912	William Schlesinger	
913	Kathleen Medina	
914	Barbara Kantola	
915	Peter Roche	
916	Emily Van Alyne	
917	Warren Lent	
918	Bracha N. BOMZE	
919	Frank Bodine	
920	Bruce Bonifaci	
921	Sue Holtz	
922	Joel Sokolsky	
923	Dr John Brooks	
924	Glen Young	
925	Alan Wallach	
926	Thomas McNamara	
927	Leslie Zebrowitz	
928	Mark Donahue	
929	Jesse Silver	
930	Amarantha Harrison	
931	Frances Lorie	
932	Michelle Benes	
933	Barbara Mesney	
934	Lindsley Rice	

Submission ID	Name	Organization Name
935	Carrol Rose	
936	Marie Leithauser	
937	Pete Keay	
938	Harvey Hobson	
939	Frederick Fillmore	
940	Joanne Linden	
941	Charesa Harper	
942	Edward Kuszajewski	
943	Regina Brooks	
944	Judith Bemis	
945	s l	
946	Karen Guma	
947	Jeffrey Valentine	
948	Dinah Manista	
949	Sue Stoeckel	
950	Robert Vandervennet	
951	Barbara Warshawsky	
952	Edie Lackland	
953	Elaine Jarrett	
954	Michael Wherley	
955	April Eversole	
956	ann violi	
957	Heidi Plonski	
958	Robin Grothe	
959	Marilyn McMullen	
960	Barbara Johnson	
961	Jeremy Trimm	
962	Wayne Russ	
963	Lloyd Hedger	
964	Rex Backus	
965	Sandra Yeager	
966	Mike Nestor	
967	Matthew Schaut	
968	Edgar Petry	
969	Carol Hurlburt	
970	Richard Cichon	
971	Linda Wheeler	
972	steve hartman	
973	Carolyn Johnson	
974	Hannah Lemke	
975	Fr. Jim Hoffman	
976	George Bond	
977	Cynthia Edwards	
978	Deborah Perkins	
979	Sidney Cholmar	
980	Steve Liebling	
981	Judy Dangleo	
982	Francis S.	
983	Jacqueline Mellinger-Bradley	
984	Robert Stevenson	
985	Katherine Wright	
986	Andrew Johns	
987	Nancy Hartman	
988	R Connell	

Submission ID	Name	Organization Name
989	Rudy Zeller	
990	Barbara Brett	
991	Ivan Makfinsky	
992	Angelo Giganti	
993	Mary Stanton	
994	Kathryn Posten	
995	Patricia Williams	
996	James True	
997	Dana Kissner	
998	Margaret Christensen	
999	Thadeus Dziekonski	
1000	JOHN PRYBYLSKI	
1001	Mark Ablondi	
1002	Charles Trebes	
1003	Tyler Santoro	
1004	Kenneth Proper	
1005	Rebecca Nafey	
1006	Jan Grant	
1007	Stephen Bartos	
1008	Holly Graves	
1009	Michelle Kettel	
1010	Karen Venegas	
1011	Crystal Mitchell	
1012	Dagmar Fabian	
1013	Pamela Chipman	
1014	Linda Williams	
1015	Wayne Davison	
1016	Flora Martinez	
1017	Elaine Mayer	
1018	Kay Gabriel	
1019	Carol Boram-Hays	
1020	Steven Burr	
1021	Marylee Scherdt	
1022	Juan Reynoso	
1023	Elaine Ososki	
1024	Madilyn Fox	
1025	Pat Harrison	
1026	Norman Hoffman	
1027	Susan Anderson	
1028	K Kikawa	
1029	Steven Paxton	
1030	Bob M	
1031	Anita Kiefer	
1032	Kelly Keefer	
1033	Francis Cleary Jr.	
1034	Felicity Devlin	
1035	Corinne Dodge	
1036	Mark Barrios	
1037	Roberta Ahlquist	
1038	Sydney Wilde	
1039	Pam Blue	
1040	Jerome Milks	
1041	Maureen Wulf	
1042	Pamela Harper-Smith	

Submission ID	Name	Organization Name
1043	Pat Felcan	
1044	Gary Lofgren	
1045	Mary Adriance	
1046	Saroyan Humphrey	
1047	William Warner	
1048	Richard Glider	
1049	Pat Bell	
1050	Jan Emerson	
1051	Arthur Warren	
1052	Nina Rollow	
1053	Susan Porter	
1054	Meghan Frost	
1055	Jennifer Florez	
1056	Jared Oliver	
1057	Courtnie LaChaine	
1058	Eric Dolezalik	
1059	Stephen Dutschke	
1060	James DeGrave	
1061	Linda Marshall	
1062	Daniel L. Harris	
1063	C. Men	
1064	Charmaine Webb	
1065	Bp. Thomas H. Hooker.	
1066	Cynthia Narkoff	
1067	Jeanne Schuster	
1068	Diane Good	
1069	Ken Steben	
1070	June Brumer	
1071	Garth Casaday	
1072	Patricia DeLuca	
1073	Adam Reeves	
1074	Lisa Schoultz	
1075	Sarah Bedell	
1076	Al Blake	
1077	Frances Marquart	
1078	Sunny Thompson	
1079	Kathleen Sumida	
1080	Maryann Gianantoni	
1081	Nancy Bella	
1082	Dorothy Nirenstein	
1083	William Schmidt	
1084	Lisa Daubert	
1085	Joan Normington	
1086	F. Jay Pocius	
1087	Jan Ealy	
1088	Judith Zwicker	
1089	Alton Roundy	
1090	Tony Segura	
1091	Angela Hoehne	
1092	Maggie Lopez	
1093	Marilyn Kaggen	
1094	Tedd Ward Jr.	
1095	Valerie Wasson	
1096	Virginia Rice	

Submission ID	Name	Organization Name
1097	Nancy Havassy	
1098	C. Jemison	
1099	Ellen Karnowski	
1100	Mia Wyatt	
1101	Ruth Wootten	
1102	Elizabeth Spiher	
1103	Linda Smith	
1104	Peter Tafuri	
1105	Susan Clark	
1106	Kenya Pea	
1107	cheryl Erb	
1108	Kathleen Osgood	
1109	Patricia Marino	
1110	Jules Wanderer	
1111	Michael Workman-Morelli	
1112	Jason Scanlin	
1113	Matthew Eckman	
1114	Sandra Gantose	
1115	Laura Cultrera	
1116	Bruce Slater	
1117	Pat Robinson	
1118	Mark Gotvald	
1119	Gerald Kron	
1120	perry harris	
1121	Gabriele O'Neil	
1122	Dan Volgman	
1123	America Sherwood	
1124	Robert Cassinelli	
1125	Valerie Snyder	
1126	Sylvia Valencia	
1127	Mary Rodriguez	
1128	Teri Danos	
1129	Stephen Gottlieb	
1130	Carlos F Cabezud	
1131	Val Askew	
1132	James Roberts	
1133	Richard Niemiec	
1134	Sher Pullen	
1135	Nikia Popow	
1136	Wendy Bowman	
1137	Frank Velez	
1138	Paul Ames	
1139	Sandra Couch	
1140	Mary Ann Vande Vusse	
1141	Sue C Beach - Holm	
1142	Kimberly Vaz	
1143	Alice Brody	
1144	Thomas Weaver	
1145	Teresa Mays	
1146	Sonia Hernandez	
1147	Luise Snell	
1148	REBECCA REID-JOHANSSON	
1149	Peter Zander	
1150	Belinda Colley	

Submission ID	Name	Organization Name
1151	Stephen Jerome	
1152	Douglas Kingsbury	
1153	Richard Zimmermann	
1154	Nancy Giuliani	
1155	Ferris Kawar	
1156	Tanya Russ	
1157	Lisa Neste	
1158	Darrell Schmidt	
1159	Eric Schurman	
1160	Cynthia Sheikh	
1161	Ruth Geraets	
1162	Juyne Triplett	
1163	DAVID SCHALL	
1164	Diane Bynum	
1165	Patricia Cooney	
1166	Leonard Obert	
1167	Jaclyn Joy Lewis	
1168	Marijke Holtrop	
1169	bruce rolff	
1170	Susan Arroyo	
1171	Michael Hormel	
1172	Jerry Peavy	
1173	Philip Snelling	
1174	William I Foster	
1175	Rhetta Alexander	
1176	Lauren Leonarduzzi	
1177	Chattie Van Wert	
1178	JANUSZ MAK	
1179	James Vandenbosch	
1180	John Hagen	
1181	Carolyn Svendsen	
1182	McCormick Douglas	
1183	Adrienne Hochberg	
1184	DAVID JUDD	
1185	Linda Dodson	
1186	Roger Francis	
1187	Kent Grigg	
1188	Erin Javurek	
1189	Linda Newman	
1190	Ingrid Rochester	
1191	Jessamyn Allen	
1192	Debby Goldman	
1193	A L	
1194	William Kolb	
1195	W Lynch	
1196	Mike Toncray	
1197	Terry Montgomery	
1198	Margaret Merrill	
1199	Maureen Peterson	
1200	Erica Bartlett	
1201	Jordan Arendas	
1202	Julie Marquis	
1203	J.a. Zaitlin	
1204	Jeffrey Coleman	

Submission ID	Name	Organization Name
1205	roland d'amour	
1206	Louise Backer	
1207	Y. Armando Nieto	
1208	Christina E Dickson	
1209	Ruth Britton	
1210	Christian Ricardi	
1211	Alexander Brebner	
1212	David D. Walgenbach	
1213	David Way	
1214	William Slowinski	
1215	N Refes	
1216	Glenn Franko	
1217	Steve Wand	
1218	Gary Anderson	
1219	Judith Smith	
1220	Ruth Kuch	
1221	Liz Amsden	
1222	Cal Cole	
1223	Raymond Blumel Jr.	
1224	Juli Hamilton	
1225	David Turnoy	
1226	Janice Taylor	
1227	Cal Cole	
1228	Donna Greenwell	
1229	Alison Eckels	
1230	Carol Jamison	
1231	Kelly O'Foran	
1232	Ralph Jones	
1233	Christy Barnes	
1234	Emilie Johnson	
1235	Judy Schultz	
1236	Julie Hansen Hansen	
1237	Sheila Winston	
1238	Ute Saito	
1239	Steven Nasir	
1240	Rosana Bruner	
1241	Dan Gonzalez	
1242	Edward Yee	
1243	Richard Bleam	
1244	Colin Goggin	
1245	Jim Gross	
1246	Molly Swabb	
1247	Robert H. Feuchter	
1248	Barb Oakes	
1249	Kristin Vyhna	
1250	Patricia Adamo	
1251	Jerry Persky	
1252	Penelope Andrews	
1253	Robyn Chance	
1254	r a markowicz	
1255	James Niskanen	
1256	Carolyn Papke	
1257	Constance Jones	
1258	Kay E Tousley	

Submission ID	Name	Organization Name
1259	Alice Stack	
1260	Tom Hougham	
1261	Susan E. Butler	
1262	Stephanie Mory	
1263	Betsey Porter	
1264	Michael Wood	
1265	Terrance Kluz	
1266	Judith Stone	
1267	Denny McKinney	
1268	Evelyn Adams	
1269	Ana Castellon	
1270	inga vickers	
1271	Tim Storer	
1272	Andrew Baron	
1273	Garret Black	
1274	Jay Jensen	
1275	Philip Calcagno	
1276	Frank Wissler	
1277	Virginia Talbot	
1278	Peter Sepe	
1279	Erica Stanojevic	
1280	gloria walker	
1281	Susan Ervin	
1282	Clarke Rogers	
1283	Zephyr Isely	
1284	William Leo Grgurich Jr	
1285	Ewan Plant	
1286	Vonya Morris	
1287	Caryn Cowin	
1288	Jean Bevsek	
1289	Geneva Lee	
1290	Conor May	
1291	Bill Wiener	
1292	Jon Grier	
1293	Zoe Strassfield	
1294	Joan Sadlo	
1295	Deborah Shin	
1296	Rebeca Torres-Rose	
1297	Michael Galvin	
1298	Priscilla Martinez	
1299	William Mittig	
1300	Joanne DeHart	
1301	maggie Vaughn	
1302	Gregory Ptucha	
1303	Eliot Tigerlily	
1304	Joseph Razo	
1305	Hannah Osborne	
1306	Jean Thomas	
1307	Bronwen Evans	
1308	Clark Buchner	
1309	John Davis	
1310	Michelle Trafficante	
1311	robert clark	
1312	chuck Barnhart	

Submission ID	Name	Organization Name
1313	Kathleen McQuade	
1314	Vicki and Rod Kastlie	
1315	Patricia Wright	
1316	Jill Meier	
1317	Glen Himberg	
1318	Barbara Rowes	
1319	Jean Hodgins	
1320	Margaret Nelson	
1321	Jane Miller	
1322	Lynda Armona	
1323	Katherine Lander Lander	
1324	Nancy Santori	
1325	Richard Grooms	
1326	Christine Moreno	
1327	charlotte cook	
1328	Joel Brownstein	
1329	Janet Linde	
1330	Gary Hull	
1331	Jean Paskowitz	
1332	Michael Kato	
1333	Connor Hansell	
1334	Jesse Kessler	
1335	Claire Morency	
1336	Marsha Buck	
1337	Marita Woods	
1338	Melanie Hickernell	
1339	Edward Tomeo	
1340	John Aviani	
1341	Deborah Meckler	
1342	Jeffrey Greif	
1343	Jesse Richardville	
1344	Mark Creighton	
1345	Sean O'Dell	
1346	Aaron Ucko	
1347	Allison Griggs	
1348	Susan Zieman	
1349	Donald Buxton	
1350	Angela Gallo	
1351	Harry Laufman	
1352	steve jacobs	
1353	Diane Sevald	
1354	Susan K bahary	
1355	Shirley Sutter	
1356	Mark Soenksen	
1357	J Quick	
1358	Burt Neal	
1359	Linda Francisco	
1360	Esther Tester	
1361	Scott Mills	
1362	Liz Eisenbeis	
1363	Ariana Watkins	
1364	Bonnie Murphy	
1365	Eve Schwartz	
1366	Diane Wildes	

Submission ID	Name	Organization Name
1367	Michael Howden	
1368	Carlos Zarur	
1369	Michael Baranski	
1370	Rana Irby	
1371	Peter Carey	
1372	Kristel Buck	
1373	Marcia Kellam	
1374	Ramsey Gregory	
1375	Jane Broendel	
1376	Malinda Poduska	
1377	Carol Myers	
1378	Kat Stephens	
1379	Terry Akana	
1380	Dennis Trembly	
1381	Mark Walton	
1382	GLENN PETRY	
1383	Thea Ostroy	
1384	David and Beverly Fleming	
1385	Walter Klockenbrink	
1386	Gina Norton	
1387	Vicki Huber	
1388	Glen Benjamin	
1389	Ed Moritz	
1390	Deborah Swanson	
1391	Kathy Dabanian	
1392	Amber Manske	
1393	walter erhorn	
1394	Teresa Mueller	
1395	James Hartman	
1396	Erin Orozco	
1397	Marie Snavely	
1398	Warren VanHoose	
1399	John Edison	
1400	Anne Anderson	
1401	B Sullivan	
1402	Judy Knueven	
1403	Keith Adams	
1404	Edward H. MacDonald	
1405	Brian Ainsley	
1406	Teresa Reitinger	
1407	Abraham Clabby	
1408	p perron	
1409	Starbear Nygard	
1410	Hilary Morgan	
1411	Amy Wilson	
1412	Agnes Hetzel	
1413	Toni Arnold	
1414	Margaret Misch	
1415	B Paul Horne	
1416	Pamela Jiranek	
1417	Lisa Hammermeister	
1418	Kevin Toney	
1419	Jonathan Hartman	
1420	Oleh Sydor	

Submission ID	Name	Organization Name
1421	Scott Britton-Mehlisch	
1422	Linda Bowers	
1423	Jeremy Del Nero	
1424	Margerite Slobodian	
1425	Carolyn Elliott	
1426	Larry Needleman	
1427	Tim Leighton	
1428	Elvera Johnson	
1429	Dennis Rogers	
1430	Gordon Radovich	
1431	Robin Reinhart	
1432	Mitchell Schweickart	
1433	Diana Praus	
1434	Darian Mark	
1435	Robert MacFarlane	
1436	S Rennie	
1437	Rosie Miller	
1438	Dave Goodlin	
1439	William Spadel	
1440	Richard Gorman	
1441	Skylar Sutton	
1442	Steve Pellegrin	
1443	Donald schmitt	
1444	CATHERINE Iliff	
1445	Michale Noll	
1446	Liz Baum	
1447	Katie Austin	
1448	Mary Wooldridge	
1449	Connie Springer	
1450	Debra Rehn	
1451	Olivia Wong	
1452	Rachel Pinal	
1453	Roxane Dow	
1454	Malina Sem	
1455	James Feit	
1456	Zach Kadar	
1457	Carol Trevey	
1458	David Peppers	
1459	Alan Ticotsky	
1460	Esther Breslau	
1461	Hygie Starr	
1462	MaryAnn Taylor	
1463	Steven J McMichael	
1464	Tina Gallaway	
1465	Amy Henry	
1466	Gail Ohara	
1467	Eleanor Hiteshew	
1468	Bobbie Upson	
1469	THEODORE LYNN	
1470	Frank Blake	
1471	Robert Whitehead	
1472	Jerry Anderson	
1473	Robin HERO	
1474	Donna Grant	

Submission ID	Name	Organization Name
1475	J. Venneman	
1476	Wayne Michaud	
1477	Josh Shaeffer	
1478	Jane Barron	
1479	Cheryl Hamilton	
1480	erin enger	
1481	Stephen Parks	
1482	Maureen Gwynn	
1483	Rene Bobo	
1484	Joan Prefontaine	
1485	Michael Swensen	
1486	Elizabeth Schwartz	
1487	Michelle Jarrett	
1488	David Root	
1489	Glen A Twombly	
1490	Allan Rodgers	
1491	Pat Fox	
1492	Nancy Baise	
1493	Char Hoffman	
1494	Bill Bowman	
1495	Claude Phipps	
1496	Kevin Schader	
1497	Gerald Shaia	
1498	Stacie Slay	
1499	Maria Clair-Howard	
1500	Bonnie Karrin	
1501	Cecelia Whalen	
1502	Peter Fox	
1503	Glenn Hufnagel	
1504	Mark Evans	
1505	Matthew Lennon	
1506	Theodore C. Snyder	
1507	R D	
1508	Reto Pieth	
1509	Joan Yater	
1510	Matthew Groenke	
1511	Gabriel Voiles	
1512	Jai Parekh	
1513	diane kopan	
1514	Vincent De Stefano	
1515	Matthew Reardon	
1516	Rene Ray	
1517	Dennis Markovchick	
1518	Kyra Mikala	
1519	Brenda Allen	
1520	Audrey Brownell	
1521	Sue Lundquist	
1522	Jeremy Feldman	
1523	Elizabeth Mitchell	
1524	Jack Polonka	
1525	Brian Dalton	
1526	Debbie Schepis	
1527	Margaret Wang	
1528	Francine Lampros-Klein	

Submission ID	Name	Organization Name
1529	Kathy Oppenhuizen	
1530	Judith Labadie	
1531	Lisa Gherardi	
1532	Sarah Dolinar	
1533	Paul Kolak	
1534	John Curry	
1535	Conny Hatch	
1536	Sheldon Stone	
1537	Hope Rieden	
1538	Rodney Whisenhunt	
1539	CHERYL BYRD	
1540	Chris Anderson	
1541	Devin Benson	
1542	Lawrence Lewis	
1543	David Borrelli	
1544	Andrew Cawley	
1545	Michael Dubrick	
1546	Gene Hiegel	
1547	David Montgomerie	
1548	Desiree Carbone	
1549	Marcia Edelen	
1550	Louis Falzerano	
1551	Karo Castro-Wunsch	
1552	Mark Lotito	
1553	Nicki Marx	
1554	Nan Weilage	
1555	Jessica Moylan	
1556	Karen Abler	
1557	Sherril Gerell	
1558	Ned Hulbert	
1559	Diane Kent	
1560	Lawrence Parrish	
1561	Joan Bowers	
1562	Stamatina Podes	
1563	Marie DAnna	
1564	Shirley Schue	
1565	Susanna Chivian	
1566	Tony Cho Cho	
1567	Chris Worcester	
1568	Andrew Henry	
1569	Raymond Intemann	
1570	Mark Walkowski	
1571	Ulysses James	
1572	Richard McCrary	
1573	Jack Branum	
1574	Damian Maureira	
1575	Gary Gardner	
1576	Jeannie Ferrara	
1577	Margaret Reiter	
1578	Anthony Vella	
1579	Rich Hughes	
1580	Christy Cypret	
1581	J S	
1582	Marilyn Johnson	

Submission ID	Name	Organization Name
1583	Kris Lacy	
1584	Jeanne B	
1585	Ray Couture	
1586	Glorimar Santiago	
1587	David Chambers	
1588	Karen Vayda	
1589	David And Linda Hart	
1590	Carrol Kuhlow	
1591	Jack Albert	
1592	Mauricio Parra	
1593	Roberta Abbey	
1594	Paulette Zimmerman	
1595	Christine Caredda	
1596	R. Thomas Ward	
1597	Aimee Wyatt	
1598	Nico Duonn	
1599	Joanne Shansky	
1600	Lee Bowman	
1601	Annie Caton	
1602	Jacquelin Harris	
1603	Deborah Childers	
1604	Nora Junod	
1605	Jamila Garrecht	
1606	Richard Shannahan	
1607	Rachel Sanders	
1608	Kerry Kuhn	
1609	Lee Milligan	
1610	Derek Davidson	
1611	Kris Strate	
1612	Gordon Levin	
1613	Barbara Gross	
1614	George Somerville	
1615	Frank Lahorgue	
1616	V. Alton Dohner	
1617	David Stetler	
1618	Michael Sheidler	
1619	Bonnie McGraw	
1620	Christina Babst	
1621	Leslie Lawson	
1622	Christine Austin	
1623	Sandra Cuza	
1624	Paul Marquardt	
1625	Adarsh Ayyar	
1626	Russell Graham	
1627	michael earney	
1628	Gabriel Gamboa	
1629	Jerry Jorgenson	
1630	Nico Duonn	
1631	SUSAN BACHE	
1632	Leila Gill	
1633	Edye Calderon	
1634	James Goeke	
1635	Jessica McCarty	
1636	Don May	

Submission ID	Name	Organization Name
1637	Sally Bogan-Kirk	
1638	Phil Hembury	
1639	Elaine Edell	
1640	Grace Sinden	
1641	Carol Perry	
1642	Mark Nuckols	
1643	Linda Ketelaar	
1644	Rebecca Kolar	
1645	Joni Schroeder	
1646	Ellen Smith	
1647	BRIAN SCHROEDER	
1648	stacey francis	
1649	Amber Sumrall	
1650	Anne Hepfer	
1651	Michael Friedman	
1652	Vernon Fath	
1653	Peter Townsend	
1654	Mark Bisanzo	
1655	Anita McNamara	
1656	Karen Wilson	
1657	Ed Hibbard	
1658	Denise Louie	
1659	Cecelia Whalen	
1660	Lisa Scharin	
1661	m w	
1662	Peg Hewitt	
1663	Mark Bartleman	
1664	ileana vasquez	
1665	William Diederich	
1666	Michael Smith	
1667	Elisabeth Sherman	
1668	Morisette Alvarez	
1669	cathy crum	
1670	Beth Livensperger	
1671	Rebecca Barbarino	
1672	Emily Cruz	
1673	Victoria Randall	
1674	Robert Cook	
1675	Ken Flanders	
1676	Margaret Kirtley-Sternberg	
1677	Brad Walker	
1678	james Clement	
1679	Jamie Hines	
1680	Lorraine Faford	
1681	Dianne Douglas	
1682	Marc Frazer	
1683	William Van Bel	
1684	Jonathan Miller	
1685	Isabelle Lorans	
1686	Robert Halsey	
1687	William Kennedy	
1688	Steven Radzik	
1689	Bonnie Westbrook	
1690	KATHY CLARK	

Submission ID	Name	Organization Name
1691	Janice Dannhauser	
1692	Maria Carmen Johnson	
1693	Judy Commons	
1694	Mary Leslie	
1695	James Scoville	
1696	Mary Sloan	
1697	Gail Hoover	
1698	Barbara Prato	
1699	Elizabeth Burdash	
1700	Michael Seno	
1701	Patricia Hoffstatter	
1702	Michael and Jeanine Clarke	
1703	Tim Luongo	
1704	Herman Chaney	
1705	Joel Dawson	
1706	JoAnn Hummers	
1707	Melanie Lavimoniere	
1708	Vicki Macina	
1709	Paul Lau	
1710	Mattie Haack	
1711	Brian Schwartz	
1712	Patti Tomasello	
1713	Catherine Kroeger	
1714	Rachel Cairns	
1715	Julie Melton	
1716	shirley midyette	
1717	Ronald Whitmore	
1718	Kathryn Jacobs	
1719	Angela Zellner	
1720	Janet Condino	
1721	Sarah Marie Hughes	
1722	Paul Chapman	
1723	ann coz	
1724	Kristen Wieggers	
1725	Madalyn Benoit	
1726	Charles Calhoun	
1727	Pete MacGregor	
1728	Patricia Griffin	
1729	C M	
1730	Philip Walker	
1731	Ed Kraynak	
1732	Karen Cignoli	
1733	Dorothy Miller	
1734	Frances Hormel	
1735	Dawn M Nothwehr	
1736	Sue Janssen	
1737	Lee Bible	
1738	Stuart Wamsley	
1739	Toms Herndon	
1740	Pamela Caprio	
1741	Stacy Bouilland	
1742	Nick Bogle	
1743	Dorothy Hulsey	
1744	John Avery	

Submission ID	Name	Organization Name
1745	Karen McCaw	
1746	Paula Holmes	
1747	Kevin Bessett	
1748	John Ryder	
1749	Sheila Mazar	
1750	Gerri Battistessa	
1751	Kevin Jensen	
1752	Marlene Cohen	
1753	Ann Hernday	
1754	Maryann Finke	
1755	Mark Tortoriello	
1756	Mo Kafka	
1757	patrick otton	
1758	Barbara Bivona	
1759	Daniel Ferry	
1760	Therese Picard	
1761	Lisa Walthers	
1762	Harold Kornylak	
1763	Elizabeth Gullen	
1764	Carole Helmkamp	
1765	Glen Williams	
1766	fran merker	
1767	Jill Alibrandi	
1768	Richard Siciliano	
1769	Amy Dewey	
1770	Beth Rendall	
1771	Jon Huntington	
1772	Charles and Diana Quinn	
1773	Scot Seader	
1774	Thomas Dawley	
1775	Thomas Dawley	
1776	McKenna Morrigan	
1777	David Rodriguez	
1778	Nicolette Froehlich	
1779	Karen Talentino	
1780	Sharon Longyear	
1781	Erin Karp	
1782	Ari Schwartz	
1783	DAVID Tilton Jr	
1784	H. Porter	
1785	Kristen Bossert	
1786	Jim Green	
1787	Bryan Hermsen	
1788	Laura Prestridge	
1789	Charles Perez	
1790	Robert Abela Serra	
1791	David Henry	
1792	Ted Schram	
1793	Deborah Hall	
1794	Thomas MacNamara	
1795	Ann Miller	
1796	Paul and Kathleen Nelson	
1797	Roberta Lehrman	
1798	Ellen Sansone	

Submission ID	Name	Organization Name
1799	Dr. Joseph F. Muratore	
1800	Ann rogers	
1801	Carol Van Houten	
1802	David Harlan	
1803	Art Hehn	
1804	Sandra Derr	
1805	Maureen Crowley	
1806	Cherie Cray	
1807	Virginia Jastromb	
1808	S -	
1809	virginia weaver	
1810	Ellie McGuire	
1811	Jenny Saar	
1812	Joel Conn	
1813	michele smolen	
1814	Richard Miller	
1815	Daniel Manobianco	
1816	Stephen Latek	
1817	Rebecca Galloway	
1818	Debra Metzger	
1819	Sheri Varner-Munt	
1820	Ivalee Wilson	
1821	Michael Mickelsen	
1822	Marilyn Livote	
1823	Matt Baas	
1824	Judith Singsen	
1825	Marion Griswold	
1826	Sharon Parshall	
1827	Melissa Marcus	
1828	Mark Schuermann	
1829	Michael Hester	
1830	Marcia Halligan	
1831	Sara Smith	
1832	William Volcko	
1833	Lawrence Molin	
1834	Maryellen Todd	
1835	G. White	
1836	Keith Johnson	
1837	Jeffrey Parcels	
1838	Jane Bender	
1839	David Herdman	
1840	Joanne LaFreniere	
1841	Peter Lauterbach	
1842	Kent Johnson	
1843	Martin Levisen	
1844	KL Matlock	
1845	STEPHEN YOUNG	
1846	Mark Hemenway	
1847	Millie Magner	
1848	Deborah Temple	
1849	Marguerite Barragan	
1850	Stephanie Clark	
1851	John Haag	
1852	Patricia Rain	

Submission ID	Name	Organization Name
1853	Susan Knox	
1854	Susan Spain	
1855	Timothy Gallaway	
1856	Robert Cannon	
1857	saul schreier	
1858	Dan LeMieux	
1859	Gordon Foster	
1860	Sonya Smith	
1861	Marsha StLouis	
1862	Aleasa Crary	
1863	Judy Plank	
1864	Inna Gergel	
1865	Stephen Hopkins	
1866	Theresa Sullivan	
1867	Vincent Lopez	
1868	Louise Jenkins	
1869	Bob Leppo	
1870	Alexander Honigsblum	
1871	Catherine Kenny	
1872	Philip Bandy	
1873	Jen Cantine	
1874	Chad Thomas	
1875	Ron Blau	
1876	Paul Lerman	
1877	Dolores Arndt	
1878	Gina Bennett	
1879	Molly Mott	
1880	Robert Essman	
1881	Theresa Acerro	
1882	Virpi Toivonen	
1883	Mary Boniello	
1884	Jeanne Doherty	
1885	Anne Lakota	
1886	Thomas Bostick	
1887	Timothy Van Egmond	
1888	Jennifer Moix	
1889	Rob Johnston	
1890	Janis Luedke	
1891	George Muller	
1892	John Metzcar	
1893	Terry Chatterton	
1894	Stephen Luptak	
1895	Maria Miller	
1896	Brian Resh	
1897	J Hague	
1898	Evelyn Griffin	
1899	Zanne Charity	
1900	Gary Brill	
1901	Duane Burtner	
1902	Andrew Hoffman	
1903	Eleanor Horneman	
1904	Lynn Attwood	
1905	Adriane Bosworth	
1906	Jillian Fiedor	

Submission ID	Name	Organization Name
1907	Roberta Healey	
1908	Daniel Savage	
1909	Cindy Mazurek	
1910	Mary Sharman	
1911	Mary Novasic	
1912	daniele dumais	
1913	Christine Dugan	
1914	Benjamin Alpers	
1915	William Aldrich	
1916	Barbara Oman	
1917	Tom Tripp	
1918	Donald Solomon	
1919	Darlene Wolf	
1920	vera jeanne	
1921	Kay Samson	
1922	Benjamin Bonnet	
1923	Samuel Gooch	
1924	Kat Connerty	
1925	Dennis Cosentino	
1926	Nicole Fortier	
1927	Rina Malerman	
1928	priscilla smith	
1929	Edwin Hollowell	
1930	Caroline B. Gakenheimer	
1931	Steve Simmons	
1932	Ellen S Cohen	
1933	Karen Harrington	
1934	Janet Barad	
1935	Linda Kram	
1936	marcia caban	
1937	Jonathan Walter	
1938	Paul Turner	
1939	John Guthrie	
1940	Constance Kozel	
1941	I. Michael Kadish	
1942	John Moreau	
1943	John Parham	
1944	Robert Liebman	
1945	Denise Fogel	
1946	Noah hall	
1947	Todd Cochran	
1948	Dennis Schwarzauer	
1949	James Jackson	
1950	Jean Jackson	
1951	Joanne Dean-Freemire	
1952	Deborah Beattie	
1953	Kathleen Kilcommons	
1954	Sheila Kelly	
1955	Steven Hultman	
1956	Cheryl Gaiefsky	
1957	Keri Merriman	
1958	Nathan Allen	
1959	Mia Connolly	
1960	William Montgomery	

Submission ID	Name	Organization Name
1961	Margaret Keylin	
1962	Terrance Hyk	
1963	Burt Torgan	
1964	Isabel Lee-Rosson	
1965	Sandra Black	
1966	Paul Chmelik	
1967	Susan Richard	
1968	Daniel Dowdle	
1969	Darrell Budic	
1970	Kathleen Crespo	
1971	Jole Lheureux	
1972	Rinda Gordon	
1973	Ingrid Kaatz	
1974	Barbara Merritt	
1975	Gena Crow	
1976	John and Elizabeth Kramarck	
1977	Ruth Gitto	
1978	Alice Rim	
1979	Lisa Goetz	
1980	Leslie McClure	
1981	EMMA JENNINGS	
1982	lollie ragana	
1983	Sonya Curry	
1984	Leslie Calambro	
1985	Travis Jennings	
1986	Dorothy May	
1987	Jose Galvez	
1988	John Pielaszczyk	
1989	david Allen	
1990	Katrina Victoria	
1991	Joseph Michael	
1992	Barbara Mesa	
1993	Bob Weinstein	
1994	Vincent Rubino	
1995	Cecelia Whalen	
1996	ayushma khadka	
1997	Julie Lang	
1998	Jos Doty	
1999	julie harrison	
2000	Doug Vigil	
2001	Alan Goga	
2002	Sandra Beard	
2003	margo wyse	
2004	Susan Wensley	
2005	Mary Strand	
2006	Mark Daitsman	
2007	Regina Stephano	
2008	Hugh Keleher	
2009	Jenifer Johnson	
2010	Claire Bush	
2011	Ryan Enos	
2012	Jackie Pomies	
2013	Hanna Reeves	
2014	Robert Kifer	

Submission ID	Name	Organization Name
2015	Maxine O'Reilly	
2016	Veronica Bourassa	
2017	James Harnish	
2018	Fandal James	
2019	James Bronson	
2020	Constance McManus	
2021	dan vandenburgh	
2022	Christine Morrissey	
2023	Bradley Ackerson MD	
2024	Rickey Buttery	
2025	Uwe Dotzauer	
2026	Terry Schnitter	
2027	Victoria Urias	
2028	Sumeet Batra	
2029	Douglas Schneller	
2030	Lisa Cubeiro	
2031	Cynthia Dietzmann	
2032	Barbara Baird	
2033	Linda K Anderson	
2034	Mark Spitzer	
2035	John Sunde	
2036	Heather Flueger	
2037	Roy and Joyce Gamse	
2038	Vic Bostock	
2039	Michael Wechter	
2040	Tiffany Rapplean	
2041	Rick Ahnger	
2042	Melody Jacobson	
2043	Shawn Troxell	
2044	Deborah St. Julien	
2045	Mark Williams	
2046	Robert Cavaliero	
2047	Lynda Pauling	
2048	Cindy Rand	
2049	Ruth Gnagey	
2050	John Tischhauser	
2051	Terry Olson	
2052	Kenneth Douglas	
2053	Ricardo Mendez	
2054	Richard Sugeran	
2055	Malia Heckathorn	
2056	Stephanie Llinas	
2057	Arthur Gross	
2058	Michael Shinsky	
2059	Debra Evon	
2060	Yvonne Johnson	
2061	Joseph Staples	
2062	Lisa Heard	
2063	Dirk Rogers	
2064	Paula Antoine	
2065	Marcel Barrick	
2066	Domenic Rotolo	
2067	Sanjay Pal	
2068	F Corr	

Submission ID	Name	Organization Name
2069	Evan Hahn	
2070	Sandye Renz	
2071	Judith Matherne	
2072	Dominic Hall	
2073	James Smiley	
2074	Anthony LaRocco	
2075	Pete Wason	
2076	Alexander Knopf	
2077	Linos Frantzeskakis	
2078	Raye Murphy	
2079	Ann O'Connell	
2080	Renee Shur	
2081	Cindy Fenske	
2082	Sidney Nau	
2083	Isabella Meneses	
2084	Todd Kinney	
2085	Robert Moore	
2086	Alice Gard	
2087	David Kosterlitz	
2088	Paul Verzosa	
2089	Ned Reynolds	
2090	Michael Kwartler	
2091	Nancy Ellingham	
2092	Richard Prochowski	
2093	John Wall	
2094	Gary Cunniff	
2095	Peter Jasen	
2096	Stanley Royalty	
2097	betsy underwood	
2098	Ariel Fajardo	
2099	Richard Brotherton	
2100	Patricia Goldweic	
2101	Joseph Catania	
2102	dan horton	
2103	joan rubin	
2104	Edward Beshore	
2105	Tom Lee	
2106	Deanna horton	
2107	Deborah Cohen	
2108	Joe Sayre	
2109	Joseph Celentano	
2110	Laura Mazar	
2111	Kay Olan	
2112	Sara Simon	
2113	Dan Lanser	
2114	Anna Tangi	
2115	Jameson Bergen	
2116	Maryrose Cimino	
2117	Sandra Diener	
2118	Mikael Klingeborn	
2119	Robert Posch	
2120	William Briggs	
2121	John Mangan	
2122	Josh Torrey	

Submission ID	Name	Organization Name
2123	John Rose	
2124	Celia Michener	
2125	Hakan Ozmen	
2126	Gail Rollins	
2127	Jeffery Biss	
2128	Patricia Joan Hemphill	
2129	Keith D'Alessandro	
2130	Valerie Tarrant	
2131	john collis	
2132	Gwendolyn Torres	
2133	D.G. Sifuentes	
2134	Alan Burke	
2135	Lore Weber	
2136	Robert Ekman	
2137	Lynn C. Lang	
2138	Lawrence Montford	
2139	Barbara Duncan	
2140	W I	
2141	Pippa Scott	
2142	Bob Miller	
2143	Claudia Mansfield	
2144	Anne Rosati	
2145	Meghan Tracy	
2146	John Lea	
2147	Lori Krasner	
2148	John Wayne	
2149	John Christensen	
2150	Annie Winstead	
2151	Anthony Muhich	
2152	Kenneth Slining	
2153	J Bennett	
2154	John Hoffmann	
2155	Nelson S.	
2156	Don Alexander	
2157	Robin Devaney	
2158	John Nommensen	
2159	Jon Mullin	
2160	Kathleen Bell-de los Reyes	
2161	marie herron	
2162	Cathy Kohler	
2163	Barbara Newell	
2164	Candace Wilkinson	
2165	India Kelley	
2166	Lisa Lambert	
2167	Elizabeth Van Lenten	
2168	Albert Johnson	
2169	Deborah Bradford	
2170	Amber Jackson	
2171	Allan Goldstein	
2172	Maryanne Dulansey	
2173	Loren Lathrop	
2174	William Greenberg	
2175	Nancy Picillo	
2176	Leslie Stewart	

Submission ID	Name	Organization Name
2177	Jenny Collier	
2178	Sylvia Russell	
2179	William Krause	
2180	Susan Dixon	
2181	Jeremy Geller	
2182	Judith Anderson	
2183	George Bourlotos	
2184	Andrea Sher	
2185	Caroline Seaman	
2186	K.G.H. NICHOLAS	
2187	Julie Blom	
2188	Marian Cooley	
2189	Lawrence Comes	
2190	Lea Rothrock	
2191	George Sarkisian	
2192	Sylvia Breakey	
2193	Carmen Paolercio	
2194	Craig Chambers	
2195	Dixie Weeks	
2196	Grant Tiefenbruck	
2197	Marianne Fix	
2198	Martha Davis	
2199	Ralph Dowden	
2200	Pamela Jordan	
2201	FRED DAVIS	
2202	Roger Givens	
2203	DANIEL D	
2204	peter chauvette	
2205	Darlene Thorn	
2206	Margaret Bass	
2207	Sandy Kuritzky	
2208	Carl Arnold	
2209	Alex Lola	
2210	Sharyn Barson	
2211	Donna Casey-Aira	
2212	Dana McTigue	
2213	Linda Curtin	
2214	Susan Thompson	
2215	Stuart Rubinow	
2216	Travis Lynch	
2217	Magdalene Constan	
2218	E. C. C.	
2219	Donald Webb	
2220	Helen Smart	
2221	Ann Frutkin	
2222	David Jones	
2223	Jean Mont-Eton	
2224	James Shoop	
2225	Witter Swanson	
2226	Gwen Turner	
2227	Sandra Stratton Gonzalez	
2228	Elak Swindell	
2229	Jerome Zornesky	
2230	Balazs Vador	

Submission ID	Name	Organization Name
2231	Rebecca Novick	
2232	Ron Ives	
2233	Linda J Green	
2234	Jennifer Emerle-Sifuentes	
2235	Peter Rawlings	
2236	Jackie Pope	
2237	Richard Jackson	
2238	Michael Congdon	
2239	Ralph Grove	
2240	Diana Agnoli	
2241	Brigid Moreno	
2242	Tona Rose	
2243	Sharon Zayac	
2244	Phil Ways	
2245	Dennis Rentschler	
2246	Vivian Kirk	
2247	Jan Jones	
2248	Kristi Collins	
2249	Michelle OConnor	
2250	alan mickey	
2251	Susanne Groenendaal	
2252	Eunice Daily	
2253	Elizabeth Kelly	
2254	John Crahan	
2255	Mark Kane	
2256	Steven Groves	
2257	Leslie Boudrot	
2258	Preston Elrod	
2259	Diana Kliche	
2260	Paul Jerskey	
2261	Robert Carson	
2262	Alexandra Flores	
2263	Rebecca Kerr	
2264	Jeffrey Moran	
2265	James ashcraft	
2266	Philip Fortini	
2267	Jeffrey Nelson	
2268	Fauzi Tayim	
2269	Thayer Scott	
2270	leora broche	
2271	Paul Dietrich	
2272	Larry Gilman	
2273	Douglas Rives	
2274	Colleen Wysser - Martin	
2275	Robert McKay	
2276	Ezio Mattiace	
2277	Jon Pitt	
2278	Andrew Smith	
2279	Caitlin Archambault	
2280	Joan Maccari	
2281	Susan Duffy	
2282	Lewis Sternberg	
2283	Robin Del Pino	
2284	Stephanie Walton	

Submission ID	Name	Organization Name
2285	Linda Camp	
2286	Deborah Fuller	
2287	Colin Stringer	
2288	Ric Hill	
2289	Gigi Middlebrook	
2290	Peter Ayres	
2291	Kaneisha Lewis	
2292	Janice Hall	
2293	Christina Jackson	
2294	Marvin Higgins	
2295	Edith Montgomery	
2296	Amalie Duvall	
2297	Mark Witte	
2298	Al Luque	
2299	Andy Promisel	
2300	DENNIS HONKOMP	
2301	Helen Ratico	
2302	Patricia Mallory	
2303	Tonya Pilcher	
2304	Terri Decker	
2305	Paul Petersen	
2306	Jerry Mawhorter	
2307	Hunter Wallof	
2308	Lynne Luxton	
2309	Margaret Vernon	
2310	Ervin Zaikis	
2311	Carrie Gleason	
2312	Kathryn Kwiatkowski	
2313	Patricia Nolan	
2314	Jan Longenecker	
2315	Irwin Flashman	
2316	Linda Allen	
2317	Matthew Burgos	
2318	Janet Csolak	
2319	David Smeltzer	
2320	Michael Hundt	
2321	Virginia Volk-Anderson	
2322	Gary Koning	
2323	David Garcia	
2324	Marian Hull	
2325	Christopher Forsting	
2326	Kent Minault	
2327	Kristine Torrance	
2328	Zeb Nole	
2329	Robert Allenson	
2330	Dara Nix-Stevenson	
2331	Gary Smith	
2332	John Lynch	
2333	Robert Ellis	
2334	Charles Eggerstedt	
2335	daniela maines	
2336	Russell Pasqualetti	
2337	Nancy Kida	
2338	Norman Dean	

Submission ID	Name	Organization Name
2339	Nicholas Schmader	
2340	Rev James Kinney	
2341	Louise Luckenbill	
2342	Jacqueline Curtis	
2343	Carolyn Clark Pierson	
2344	Bill S	
2345	Suzie Ross	
2346	Charles Tazzia	
2347	Ruth Darden	
2348	Jeff Dorman	
2349	Andrea Snyder Snyder	
2350	Steven Goldstein	
2351	Cathy Anderson	
2352	Barbara Brooker	
2353	Phillip J Crabill	
2354	Lisa Witham	
2355	Cathie Ernst	
2356	Lee Thwing	
2357	Donald Harland	
2358	Judi Kerr	
2359	Joan Agro	
2360	Larry Seymour	
2361	Kathleen Bentley	
2362	Alan Gonzalez	
2363	Sarah Dean	
2364	Henry Leca	
2365	AnnMarie Novick	
2366	Deborah Whitman	
2367	Bonnie Bingle	
2368	Judy Hileman	
2369	Kenneth Laboski	
2370	Judy Hileman	
2371	Peter Bromer	
2372	Barbara Speidel	
2373	Alfred Higgins	
2374	Karen Breny	
2375	Mike Fegan	
2376	James Willsey	
2377	Joe Sain	
2378	Amy Weappa	
2379	Jeanne Davenport	
2380	Dominic Totaro	
2381	Angie Smith	
2382	Ray Fragola	
2383	joan viers	
2384	Mary ann Kelly	
2385	Star Seastone	
2386	Sophia Sonen	
2387	Theresa Mader	
2388	John Oleson	
2389	Mark Anderson	
2390	Diane Faircloth	
2391	Thelma Herlich	
2392	Gavin Trowsdale	

Submission ID	Name	Organization Name
2393	Joyce and Vince Small	
2394	Nancy L Cowger	
2395	Kelly Hurlbut	
2396	michael Pasley	
2397	Todd Hammond	
2398	Bonnie Howard	
2399	Norvelle Couch	
2400	Miriam Berkley	
2401	Robert Rutkowski	
2402	Tom Kunhardt	
2403	Adele Richman	
2404	Mary Clark	
2405	Helena von Rueden	
2406	kate nyne	
2407	Kevin Chiu	
2408	Theresa Stathatos	
2409	Sheryl Ferrin	
2410	TIFFANY KIERAN	
2411	Robin Goergner	
2412	Norma Skinner	
2413	Robert Uecker	
2414	Mark Warren	
2415	Susan Thomas	
2416	Carol Cantrell	
2417	erica johanson	
2418	Mark Rhodes	
2419	Lloyd Matthes	
2420	Judith Klar	
2421	Gayle Citta	
2422	Ed Paski	
2423	Michael Rouse	
2424	Sandra Lee	
2425	David Levy	
2426	Tam Amico	
2427	Theresa Hruska	
2428	Vicente Molieri	
2429	Inge Wintersberger	
2430	geri sullivan	
2431	Joseph Appleton	
2432	Claudia Martinez	
2433	Les Paul	
2434	Ramona Kopnick	
2435	C.E.Duffy Duffy	
2436	Stewart Hinze	
2437	Bobbi Lempert	
2438	Gordon McGregor	
2439	Leslie Arnold	
2440	Dave Byrne	
2441	Robert Kuljian	
2442	Jessica Weinberg	
2443	Liz Robinson	
2444	Emma Stevens	
2445	Karen LeCroy	
2446	Cailey Sweatt	

Submission ID	Name	Organization Name
2447	Vivian Carroll	
2448	Kathryn Dokoupil	
2449	Peter Goble	
2450	William Kriege	
2451	Kirsten Johnston	
2452	Edward Brophy	
2453	Philip Wells	
2454	Andrew Fischer	
2455	Steve Perkins	
2456	Pauline Rosenberg	
2457	Laraine Lebron	
2458	John Hendricks	
2459	Kenneth Kadlec	
2460	Lori Gordon	
2461	Pam Parks	
2462	Steven J Ercole	
2463	Ryan Strempe-Durgin	
2464	Karen Feiler	
2465	Kevin Benedict	
2466	Daniel Wilkinson	
2467	Natalie Barratt	
2468	Carole Richmond	
2469	Carol Fox	
2470	Catherine Wyndham	
2471	Joseph Marenfeld	
2472	Michael Sullivan	
2473	Elizabeth J Harger	
2474	Bryan McCullough	
2475	David Burtis	
2476	William Calfee	
2477	Dolph Williams	
2478	Malcolm Bastron	
2479	Dan Viele	
2480	Marie Salerno	
2481	Judith Nicolaidis	
2482	Ruth Caldiero	
2483	Stephen Fredman	
2484	Bert Schuster	
2485	Barbara Strugar	
2486	Ruth Weedman	
2487	Alan J Nishman	
2488	Peter Truitt	
2489	Rebecca Bahr	
2490	Harry Iceland	
2491	Laurel Facey	
2492	Burton and Carol Taylor	
2493	Constantine Bogios	
2494	Homer Sims	
2495	Debbi Wood	
2496	Carl Ford	
2497	Tracey Tronolone	
2498	Blinn Dorsey	
2499	Hans Schweikert	
2500	ANNE MCDONALD	

Submission ID	Name	Organization Name
2501	Brad Miller	
2502	stephen FRIEDBERG	
2503	Christopher Panayi	
2504	Stephen Fried	
2505	Beverly Fowler	
2506	Darrah Wagner	
2507	M S	
2508	Marla Berry	
2509	Claudia Shapiro	
2510	Matt Brzezinski	
2511	Martin Brown	
2512	Mary ODonnell	
2513	Margaret DiBenedetto	
2514	Richard Strowd	
2515	Matthew Genaze	
2516	Barbara Larson	
2517	Charles Scholpp	
2518	Jean White	
2519	Elaine Dellande	
2520	AMY GRACE	
2521	Kimberly Nieman	
2522	Marlena Lange	
2523	Kevin Kurtz	
2524	Andrea Reimers	
2525	Patricia Franklin	
2526	Allen Witherington	
2527	Frank Sandy	
2528	Jeffrey Phillips	
2529	Brian O'Neill	
2530	Kathryn Stevens	
2531	Sean Vennett	
2532	Leroy Haverlah	
2533	Elaine Palmquist	
2534	Robert Eby	
2535	sasha silverstein	
2536	Betty Lawrence	
2537	Paul Madzik	
2538	Thomas White	
2539	William Weinberg	
2540	ANDREW ROBBINS	
2541	Gina Petty	
2542	John Petrak	
2543	James Hanger	
2544	Brenda and Marc Newman	
2545	Steve Manns	
2546	Vicki Casarett	
2547	Christopher Scheller	
2548	Adrienne Davis	
2549	Diann Haggerty	
2550	Margaret PeGan	
2551	Phylis Cohen	
2552	Lois Looney	
2553	Chris Hein	
2554	Timothy Byrnes	

Submission ID	Name	Organization Name
2555	glen deardorff	
2556	Joseph Mayo	
2557	Veronika Pietkiewicz	
2558	Mike DellaPenna	
2559	SYLVANA ARGUELLO	
2560	David Leitch	
2561	Susanne Geiger	
2562	Trisha Broeke	
2563	Leslie Patrick	
2564	Carolyn Pettis	
2565	Wright Salisbury	
2566	Mark Lukin	
2567	alice b Ciuffo	
2568	Charles Keeling	
2569	Dennis Landi	
2570	Mary Appleby	
2571	Karen Schroeder	
2572	Ned Overton	
2573	Mindy Kruckenberg	
2574	David Veenstra	
2575	Edward Cutler	
2576	Brock Cordeiro	
2577	Nathaniel Brodsky	
2578	Char Esser	
2579	Margaret Louden	
2580	Machado Maria	
2581	Martha Nathan	
2582	Christina Penrose	
2583	Armando A. Garcia	
2584	Cy Hunter	
2585	Mary Buckley	
2586	Pamela Beard	
2587	Mary Jo Moeschl	
2588	william rastetter	
2589	Joseph Ayres	
2590	Patricia Haviland	
2591	Paul Schwarmann	
2592	Daniel Sandvig	
2593	David Miller	
2594	Deborah Gunther	
2595	Felicity Pool	
2596	Nadine Duckworth	
2597	Thomas Oriel	
2598	Dr. Demian	
2599	Kevin Reisenbichler	
2600	Pedro Hernandez	
2601	Myrna Adams West	
2602	Jodie Leidecker	
2603	Stan Czarny	
2604	Eric Lewis	
2605	Meredith Kent-Berman	
2606	Thomas Ray	
2607	Linda Sizemore	
2608	Rebecca Deardorff	

Submission ID	Name	Organization Name
2609	Allyn Schneider	
2610	Eric Ericson	
2611	Charles Darjany	
2612	I Kessler	
2613	Robert Huisman	
2614	Anne Lusby-Denham	
2615	Catherine Farrell	
2616	Lynn Markert	
2617	Andrea Mehrer	
2618	Danielle Verloove	
2619	Robert Johnson	
2620	Robert Vanderhye	
2621	James Sanderson	
2622	Jessica Cassidy	
2623	Rhonda Oxley	
2624	Burt Binner	
2625	Joan Engst	
2626	Deanna Clinger	
2627	Gail Doanth	
2628	Billy Woods	
2629	Sharon Sauro	
2630	Rebecca Backman	
2631	Janet Malcolm	
2632	Beth Drewelow	
2633	Lorraine Brabham	
2634	Pamela Colligan	
2635	Joann Puskarcik	
2636	James Harmon	
2637	Linda Collins	
2638	Ramona Stoeve	
2639	Kathy Lucy	
2640	Jason Carroll	
2641	Paul Swartzel	
2642	Dorothy Fox	
2643	Christopher Mazauskas	
2644	Carol Dearborn	
2645	Pamela Parker	
2646	David Merrill	
2647	Leola Russell	
2648	K. Lipps	
2649	Melissa Jolly	
2650	JANE POPKO	
2651	Melissa Jolly	
2652	Laura Dominguez	
2653	Susan Diller	
2654	Kathryn A. McWilliams	
2655	Michael Hogan	
2656	David Ernst	
2657	Senator Dennis Bradley	Connecticut State Senate
2658	Ilene Kazak	
2659	Sharon Kowalski	
2660	Elisabeth Olsson	
2661	Chris Murphy	
2662	John Griggs	

Submission ID	Name	Organization Name
2663	Polly Quick	
2664	Tiffany Haverfield	
2665	Noah Youngelson	
2666	Daniel De Paz	
2667	Janet Peterson	
2668	Mayer Selekman	
2669	Paola Cruz	
2670	Terrence Thompson	
2671	Erika DelCioppo	
2672	Percy Hilo	
2673	Margaret Neumann	
2674	Adam Flogel	
2675	Edward Duarte	
2676	Jim Reed	
2679	Perry Gx	
2680	Michele Reynolds	
2681	Linda Maslanko	
2682	Joan Verret	
2683	Malcolm Groome	
2684	Margaret Wright	
2685	Sandra Linabury	
2686	Bill Christian	
2687	Ronald Broder	
2688	Lorraine R	
2689	Wendy Blair	
2690	Jennifer Krinke	
2691	Dan Struble	
2692	Ray OBrien	
2693	Tommie Clendening	
2694	Mimi Rosenfeld	
2695	Stephen Farmer	
2696	Mary Totty	
2697	Phillip Bernhardt-House	
2698	Dan Ullberg	
2699	Cary Harrison	
2700	Will B	
2701	Virginia Anderson	
2702	Patricia Davison	
2703	Nancy Vieira	
2704	Bonnie Parks	
2705	Donna McKillip	
2706	Eric Marsh	
2707	Michele Page	
2708	Shearle Furnish	
2709	Ivy Brezina	
2710	Gale Variot	
2711	Rich Hladky	
2712	Art Shervs	
2713	Stanley Zyskowski	
2714	Penny Sidor Sidor	
2715	Wesley K. Nanamori	
2716	William Fisk	
2717	Tracy Fairchild	
2718	Lois Kaufmann	

Submission ID	Name	Organization Name
2719	Beatrix Beannacht	
2720	Frederic Peiss	
2721	Heidi Johnson	
2722	lois aceto	
2723	Richard Wallace	
2724	Mona Exinger	
2725	Sheila Kinkead	
2726	Jim Franklin	
2727	Wendolyn Hill	
2728	Stephen Frail	
2729	Judy Goebel	
2730	Helen Rynaski	
2731	Terry Brownfield	
2732	Emilie Pechuzal	
2733	Carl Tyndall	
2734	Nancy Durfee	Town of Somerset
2735	Jesse Counterman	
2736	Daphne Lambright	
2737	Ginnie Preuss	
2738	Stacy Woepfel	
2739	Theodore Fiedler	
2740	KENNETH STUEBEN	
2741	Amy Freeman	
2742	Mary Kurth	
2743	Ian Watson	
2744	A French	
2745	Marc McCune	
2746	Julia Hartman	
2747	Hermes Gonzalez	
2748	Beau Bushor	
2749	Lynn Fuller	
2750	Dr. Dorothy Black Crow	
2751	Richard Balentine	
2752	Victoria Villagran	
2753	Larry Levin	
2754	Craig Kent	
2755	Richard Gast	
2756	Bettemae Johnson	
2757	Michael and Libby Robold	
2758	garry star	
2759	Sondra Schultz	
2760	Michael and Libby Robold	
2761	Richard Herndon	
2762	Peter Hecht	
2763	Evelyn Zapata	
2764	Margaret Wood	
2765	Doug Landau	
2766	Jackie Mills	
2767	Clark Peters	
2768	Suzanne Butcher	
2769	David Reichert	
2770	Heather Hundt	
2771	Gary Landgrebe	
2772	Joan Sitomer	

Submission ID	Name	Organization Name
2773	David Kligerman	
2774	Marshall Peterson	
2775	Margaret H. robbins	
2776	Rodney Weaver	
2777	Mary Dickson	
2778	Camelia Mitu	
2779	Christine Kellogg	
2780	Wayne Andrews	
2781	Carolyn Jones	
2782	Frank Peachey	
2783	Jane Spini	
2784	Robert Brown	
2785	Avery Lee	
2786	Margaret Handley	
2787	Ruth Seeley	
2788	Rita Senn-Sikorski	
2789	Russell Collins	
2790	Don and Linda Patzke	
2791	Leland Griffin Jr	
2792	Pamela Barber	
2793	Mark Fox	
2794	Larry Salvatoriello	
2795	Theodore Smith	
2796	Priscilla Martinez	
2797	Anthony DiPentima	
2798	Barbara Moore	
2799	Rick Battaglia	
2800	Leslie Gavin	
2801	Frank Peachey	
2802	Richard Ruscitto	
2803	David Doerr	
2804	Charlie Day	
2805	Frank Peachey	
2806	Margaret Lawson	
2807	Rebecca Straw	
2808	Joan Baseman	
2809	Frank Peachey	
2810	Ian Ehrlich	
2811	Warren Cross	
2812	Martha Person	
2813	Julian Corley	
2814	Lynda Ream	
2815	Carlton Russell	
2816	Patricia Fleetwood	
2817	Julian Corley	
2818	Louis LaBrunda	
2819	Michael O'Brien	
2820	Tina Lynch	
2821	Marianne Pratt	
2822	Alice Williams	
2823	Nancy Petersen	
2824	kristin gonzalez	
2825	Patricia Constantino	
2826	Charlotte Shnaider	

Submission ID	Name	Organization Name
2827	David Burns	
2828	arline lohli	
2829	janice wallace	
2830	Jay Houlahan	
2831	Greg Kromholtz	
2832	WILLIAM PRITCHARD	
2833	Lucille Nurkse	
2834	Tricia Nier	
2835	James Sclavunos	
2836	Georgia Cotrell	
2837	Linda Snyder	
2838	Eugenia Haggin	
2839	David Tagliente	
2840	Elizabeth Roberts	
2841	Rinda gordon	
2842	Charles Arnold	
2843	Melanie Wick	
2844	Susan Krebs	
2845	Eleanor Castle	
2846	Angela Hansen	
2847	David Miles	
2848	Joan Walker	
2849	Tom Cate	
2850	Frank Valenti	
2851	Barbara Silverman	
2852	Pete McCarthy	
2853	Kelli Lee-Allen	
2854	Christie Walters	
2855	William Fragetta	
2856	Christie Walters	
2857	Davin Peterson	
2858	James Walsh	
2859	Jeffry Baldwin	
2860	David Myers	
2861	Susan Thing	
2862	Phoebe McFadden	
2863	Barbara Bloom	
2864	James Justin	
2865	Robert Harris	
2866	Fawn King	
2867	James Miller	
2868	Heather Schlaff	
2869	Noreen Lassandrello	
2870	Barbara Schwartz	
2871	Karen Hildebrandt	
2872	Diane Bynum	
2873	Helen Navaline	
2874	Michelle McCoy	
2875	Thomas Hart	
2876	Sonia Duffie	
2877	Diane Cote	
2878	Dottie Miller	
2879	Robyn Bagley	
2880	Jay Rice	

Submission ID	Name	Organization Name
2881	Karen Deckel	
2882	Ewa Piasecka	
2883	Joshua Krbez	
2884	Jo Lum	
2885	Teresa Trebotic	
2886	R Kenneth Reece	
2887	Sarah Bauman	
2888	Crystal Mcallister	
2889	Marisa Rich	
2890	Chris Hughes	
2891	Stephen Steffy	
2892	Mark Masi	
2893	S Nerken	
2894	Doc Pierce	
2895	Adam D'Onofrio	
2896	Marian Stuart	
2897	Lynn McNeal	
2898	Robert Newman	
2899	Ann Dawson	
2900	Dennis Tousana	
2901	Rod Wiens	
2902	Karen Pickarski	
2903	David Sarricks	
2904	Meryl Pinque	
2905	Elizabeth Smith	
2906	Phillip Riback	
2907	Maia Justine Storm Esq	
2908	Laurence Coronis	
2909	Sherwin Lehrer	
2910	Ralph Shannon	
2911	Ronald Garrison	
2912	Carol Kussart	
2913	Elizabeth Paramore	
2914	Betty Platt	
2915	Mary Lagatol	
2916	Karen Toyohara	
2917	Gilda Gussin	
2918	Marjorie Cutler	
2919	janis Dairiki	
2920	Howard Blaz	
2921	Carole Bonner	
2922	Marcia Sewelson	
2923	James Kotchmar	
2924	Martha Rogers	
2925	Debra Brown	
2926	Charlotte Nuessle	
2927	Jean Quinnan	
2928	Paul Till	
2929	Susan Hughes	
2930	Ellen Bartlett	
2931	Margaret O'Brien	
2932	John Dagger	
2933	Josephine Nickels	
2934	Mary Scherer	

Submission ID	Name	Organization Name
2935	Rene Szostek	
2936	Mike McCool	
2937	Richard Bright	
2938	Jo Chapman	
2939	Pam Thomas-Hill	
2940	Greg Holley	
2941	Ben Demar	
2942	Pat Hadden	
2943	Elizabeth Polanco	
2944	Aiden Barnes	
2945	Carol Thompson	
2946	Ben Lichtin	
2947	yvette fernandez	
2948	Kim A. Silva	
2949	Mary Stone	
2950	Judith Beaver	
2951	Scout Perry	
2952	Michael Stella	
2953	Mary Martin	
2954	Robert Seltzer	
2955	robert fearn	
2956	Don Smith	
2957	Brooks Barnes	
2958	Anne Seidlitz	
2959	Heather Wolle	
2960	Timothy Rea	
2961	Muammer Ekin	
2962	Lori Homan	
2963	Michael Baker	
2964	IHerman Hardy	
2965	Margaret Bell	
2966	Cheryl Reid	
2967	Kosta Bounos	
2968	Thomas Paulsen	
2969	James Whalley	
2970	C Glore	
2971	Elizabeth Ingalls	
2972	Nasir Masood	
2973	Aline Rosenzweig	
2974	Frederick Lucies	
2975	Lisa Mazzola	
2976	James Scoltock	
2977	Deborah Marchand	
2978	Anthony Torralba	
2979	karen Hellwig	
2980	Scott Kennedy	
2981	Leila Matson	
2982	Ronald Wolniewicz	
2983	Brian Runft	
2984	Donna White	
2985	Ruth Siekevitz	
2986	Wesley Chuang	
2987	Eric Hendrickson	
2988	Sarah Russell	

Submission ID	Name	Organization Name
2989	Max Micallef	
2990	william nierstedt	
2991	Benoit Azagoh-Kouadio	
2992	JL Keith	
2993	michael parry	
2994	Thomas Meier	
2995	joyce Cotter	
2996	Derek Reno	
2997	Jennifer Buhinicek	
2998	Kristin Michael	
2999	Peter Roper	
3000	Anne Webb	
3001	Carole Smith	
3002	Zanna Feitler	
3003	Robert Brian Levy	
3004	Thomas Blom	
3005	Thomas Humphrey	
3006	Kristin Kris	
3007	Veronica Sousa	
3008	Frank Smith	
3009	Brenda Cumpston	
3010	Sharon Gilbert	
3011	Christel Bolgiano	
3012	Frank Regan	
3013	Ede jazwinski	
3014	Allison Schnipper	
3015	Mimi Sherin	
3016	Mark Tips	
3017	Brian Muhr	
3018	Lucinda Wykle-Rosenberg	
3019	jack murphy	
3020	Edward Day	
3021	Barbara and Jim Dale	
3022	Warren Spaulding	
3023	Steve and Erica Davidson	
3024	Tess Fraad	
3025	Hank Cierski	
3026	Shannon Teel	
3027	Bharat Adarkar	
3028	Evey Jones	
3029	Steven Skal	
3030	Liz Mahony	
3031	Elizabeth Siebenaler	
3032	LARY MCKEE	
3033	Lucy Hansen	
3034	Devon Seltzer	
3035	Rita Sheehan	
3036	Kimberly Katzenbarger	
3037	Peter Miller	
3038	Catherine Raymond	
3039	Teresa Strom	
3040	Jack Handley	
3041	Letitia Dace	
3042	Robert Mathews	

Submission ID	Name	Organization Name
3043	Cheryl Breese	
3044	Devin Kellerman	
3045	Frank John	
3046	MR.LYNNWARD LACY	
3047	Marinda Farmer	
3048	Dominick Falzone	
3049	Lacey Hicks	
3050	Monte Allen	
3051	Gail Goldsmith	
3052	Mitchel Karp	
3053	Augustus Hemenway	
3054	Sonia Romero Villanueva	
3055	Maurice Rosenstraus	
3056	STEPHEN JACOBS	
3057	Robert Hadden	
3058	Kim N Miller	
3059	Lenore Sorensen	
3060	Melanie Lesar	
3061	Dot Muir	
3062	Elisia White	
3063	Chuck Wieland	
3064	Diane McEwan	
3065	Lewis Gersten	
3066	Boyce Booth	
3067	Joanne Sieck	
3068	Tamara Cain	
3069	charles rinear	
3070	Joseph Evelyn	
3071	Diane Gibbons	
3072	Carol Deem	
3073	Marylois Hilton	
3074	Jan Gibson	
3075	Arthur Scholbe	
3076	Evelyn Fraser	
3077	Donna Sharp	
3078	Jacob Pendlebury	
3079	Gwenna Weshinsky	
3080	Nancy Rodgers	
3081	Clara Guerrero	
3082	Christina Milauskas	
3083	Louiseann Fritz	
3084	Yvonne Poffenberger	
3085	Joseph Simmons	
3086	John Piotter	
3087	C S	
3088	Edward Matheson	
3089	Jerrold Osborn	
3090	Russell Robinson	
3091	Anthony Rampe	
3092	Christopher Horner	
3093	Jinx Hydeman	
3094	Jeannie Finlay-Kochanowski	
3095	Gary Lavinder	
3096	Janet Gerla	

Submission ID	Name	Organization Name
3097	Cheryl Speer	
3098	Teri Lockton	
3099	STRATTON McALLISTER	
3100	Mikki Chalker	
3101	Denise Kline	
3102	Hillary Ostrow	
3103	Jan Ebersole	
3104	Catherine Uchiyama	
3105	Bob Nace	
3106	Frances Bigda-Peyton	
3107	Michael Rose	
3108	Glenn Rawson	
3109	James Houser	
3110	Richard Madole	
3111	Liz Cote	
3112	James O'Flaherty	
3113	Richard Headley	
3114	Andy Johnson	
3115	James Thompson	
3116	Catherine Bullotta	
3117	MIKE HLAT	
3118	Rosiris Paniagua	
3119	Ken Stack	
3120	Deborah Gostomske	
3121	Iris Rochkind	
3122	constance lorig	
3123	Steve Scholl-Buckwald	
3124	Jennifer Reznick	
3125	Leslee Lillywhite	
3126	Colleen Llywelyn	
3127	DAVID Koutroulis	
3128	Helen Fisher	
3129	Lou R	
3130	T TODARO	
3131	Stewart Cain	
3132	Gabriel Bobek	
3133	William Staley	
3134	Elio Bonheure	
3135	Patricia English	
3136	Mary Rush	
3137	Gabriel Bobek	
3138	Dianne Hurst	
3139	Adnan Khan	
3140	Charlene Rush	
3141	Paula Morgan	
3142	Beth Jane Freeman	
3143	Ruth Sheets	
3144	Keith Zeitlin	
3145	Jim Danzenbaker	
3146	Mardene Costa	
3147	Rebecca Wish Esche	
3148	James Bochenek	
3149	Edward Colley	
3150	Patricia and Robert Gilbert	

Submission ID	Name	Organization Name
3151	Cindy Rose	
3152	terry Condon	
3153	Bill Rubin	
3154	Richard Oliver	
3155	William Johnson	
3156	Helen Chirigotis	
3157	Peter DiSpigno	
3158	Jessica Reynolds	
3159	Karen Douglas	
3160	Pamela Farnham	
3161	Julie Tyler	
3162	John Jakoby	
3163	Steve Keenan	
3164	Doris Verkamp	
3165	Joyce Kidd	
3166	Suzanne Smith	
3167	Stephen Shevlino	
3168	Victoria Pawlick	
3169	Anyce Siegel Siegel	
3170	Carl Prellwitz	
3171	Peter Haroutian	
3172	Eric Benson	
3173	Tim Brainerd	
3174	Robert Crandall	
3175	Andrew R.	
3176	Stanton Paris	
3177	Rosemary Kleinert	
3178	Karen Mallam	
3179	Charles Wirth	
3180	Charles Nagle	
3181	Ren Buck	
3182	Robert Morton	
3183	Christopher Webster	
3184	Richard Merkel	
3185	Jason Warrington	
3186	Georgiann Young	
3187	Karen Hauser	
3188	Jennie Elliott	
3189	Ira Raab	
3190	Shelly Gold	
3191	Sarah Livingston	
3192	Kirsten Burt	
3193	Philip Kritzman	
3194	Ronald Kent	
3195	Lama Lane	
3196	Rosita Rodriguez	
3197	Cherie Free	
3198	Donna Murphy	
3199	Paul Ward	
3200	Martha Kenney	
3201	Michael Young	
3202	Robin Farabaugh	
3203	Felena Puentes	
3204	Thomas Devers	

Submission ID	Name	Organization Name
3205	Charles Casper	
3206	Jeffrey Schmid	
3207	Amy Limyao	
3208	Nathan Miller	
3209	Karl Johnson	
3210	John Wiles	
3211	Krista Amigone	
3212	Gregg Taylor	
3213	Pam Wallace	
3214	Margaret Schulenberg	
3215	Kathryn Matti-Spickard	
3216	Jill MCDERMOTT	
3217	Cecelia Briggs	
3218	Judith Fisher	
3219	Peter Lee	
3220	Kelli Pecoraro	
3221	Jim Gartner	
3222	Richard Todd	
3223	Hilda Fischer	
3224	Rochelle Gravance	
3225	Peter Hand	
3226	Patrick Ramsey	
3227	Robert Payne	
3228	Roel Cantu	
3229	Cynthia Cousino	
3230	Greg Farnum	
3231	Jane Iacovetti	
3232	Ingrid Bangers	
3233	Gary Pollack	
3234	Lauren Schiffman	
3235	Duane Gore	
3236	Mar Vial	
3237	Rona Homer	
3238	francis mastri	
3239	Will Willis	
3240	Annette Coomber	
3241	Donna Leavitt	
3242	George Schneider	
3243	Alicia Kaplow	
3244	George Perla	
3245	mark youd	
3246	Lynne Marriott	
3247	amy Schumacher	
3248	Mark Godin	
3249	Susan Brickman	
3250	Michel Lombard	
3251	David Lavender	
3252	Louis Priven	
3253	Diane Jouppi	
3254	Donald H Goldhamer	
3255	Miriam Baum	
3256	Al Campbell	
3257	Tonya Stiffler	
3258	george erikson	

Submission ID	Name	Organization Name
3259	TIMOTHY KINKEAD	
3260	Sharon Hawkins	
3261	Kate Neuschaefer	
3262	Hans Hagedorn	
3263	Fabiola Banuelos	
3264	MARY DE SPIRT	
3265	Andrea Amar	
3266	Ann Gerald	
3267	Steven Lindstrom	
3268	Barb Fitzgerald	
3269	Lorraine Socorro	
3270	Heather Lyba	
3271	Maegen Gabriel	
3272	Jennifer Gilbert	
3273	Irma Bobroff	
3274	Richard Warren	
3275	Michael Carter	
3276	Matt King	
3277	Judith Cooper	
3278	natalie rook	
3279	Beth Horwitz	
3280	Robert Tefft	
3281	Carol Berlin	
3282	Peter Gottemoller	
3283	Marilyn Rose	
3284	Paul Williams	
3285	Denniseill O'Reilly	
3286	Cornelia Shearer	
3287	Douglas Vacek	
3288	Gloria Krueger	
3289	Jani Sena	
3290	Susan Linden	
3291	William Maxwell	
3292	Katharine Warner	
3293	William Skirbunt-Kozabo	
3294	Karen Spackman	
3295	Jordan Burton	
3296	Susan Coyle	
3297	Rich Earle	
3298	John Baldwin	
3299	Deirdre Downey	
3300	Jeffrey Holloway	
3301	Michael Russell	
3302	Holly Boyer	
3303	Linda Metnetsky	
3304	Ruth Heller	
3305	Pamela Kenny	
3306	Peter Lobell	
3307	Muriel Reilly	
3308	Kristen Brooks	
3309	Nancy Hom	
3310	marianne frongillo	
3311	Sandra Russell	
3312	Sheila Gazonka	

Submission ID	Name	Organization Name
3313	Jillian Sang	
3314	Curtis Hughes	
3315	Susan Schuchard	
3316	Chris Ness	
3317	Randi Field	
3318	Donald Leisman	
3319	Pierre Liechti	
3320	Phyllis Ballata	
3321	Brian Evans	
3322	Kimbrough Mauney	
3323	Marcus King	
3324	Mike Brinkley	
3325	William Cane	
3326	Nancy Hess	
3327	Theresa White	
3328	Margaret Szmanda	
3329	William Ridgeway	
3330	Jane Roddy	
3331	ElsaMarie Butler	
3332	Carol Anderson	
3333	John Miller	
3334	Chris Thoma	
3335	Gisela Hetherington	
3336	Bruce Richman	
3337	S. Barnhart	
3338	Mara Sabinson	
3339	Robert Miller	
3340	Patricia Baker	
3341	Jaime Marshall	
3342	Allen Price	
3343	Ruiz Ruiz	
3344	Thomas Brandes	
3345	Kirk Bails	
3346	Joseph Gebler	
3347	cara artman	
3348	Tim Guisinger	
3349	Farrah Grant	
3350	Barbara Klucsar	
3351	Rigel Rohr	
3352	Ingrid Varnell	
3353	Robert Banov	
3354	Alan Tucker	
3355	Neil Allen	
3356	Les Roberts	
3357	C. Miller	
3358	Kristin Walsh	
3359	Barbara Dague	
3360	Tara Chase	
3361	Christine Olsgard	
3362	EJ McConaughy	
3363	Pamela Haas	
3364	andrea fisher	
3365	Sheryl Eaton	
3366	Frank Palmeri	

Submission ID	Name	Organization Name
3367	Jon Nadle	
3368	Jess Kimball	
3369	Cynthia Brooks-Fetty	
3370	Kathryn Stinson	
3371	sakari Lindhen	
3372	Abby Wanamaker	
3373	William Benson	
3374	Naomi Berkowitz	
3375	alice trexler	
3376	Nia Cherrett	
3377	Sally Jacques Jacques	
3378	Margaret Burwell	
3379	Alice Stuhlmacher	
3380	Anna Driskill	
3381	Deeann Bradley	
3382	Theodore Silen	
3383	Rob Hoeffler	
3384	Cherri Nelson	
3385	Tricia Kob	
3386	Steve Spry	
3387	Marc Laverdiere	
3388	David Ellison	
3389	Wendy Hall	
3390	Tekku Meep	
3391	Christine and Steve Simms	
3392	Robert Applebaum	
3393	Ellen Greenwood	
3394	Karen Curry	
3395	Judith Castiano	
3396	Trevor Anderson	
3397	Marty Bostic	
3398	Kira Durbin	
3399	Kathi Thonet	
3400	Clayton Mumaw	
3401	David Lin	
3402	Patricia DeGutis	
3403	Marilee Meyer	
3404	M C Dornan	
3405	Nichelle Virzi	
3406	Michael Kast	
3407	Cigy Cyriac	
3408	Suzanne a'Becket	
3409	Ayana Arakan	
3410	susan michetti	
3411	Robert Kastrinos	
3412	Colin May	
3413	Chris Loo	
3414	Tracey Peterson	
3415	Avin Goldman	
3416	john ferchak	
3417	Zephyr Cecchi	
3418	Dennis Fisher	
3419	Linda Spangler	
3420	James Kuhn	

Submission ID	Name	Organization Name
3421	Sharon Holford	
3422	Armin Wright	
3423	Jose Miranda	
3424	Jesse Caldron	
3425	Maria Colvin	
3426	Sandra Donahue	
3427	Dorothy Brooks	
3428	Helena Kashleva	
3429	Dennis Schafer	
3430	Santiago De Aragon	
3431	David Savige	
3432	Robert Keats	
3433	Kathryn Bumpass	
3434	Wesley Banks	
3435	Pam Gray	
3436	David Ostwald	
3437	Georgia Locker	
3438	Alexander Merati	
3439	d carr	
3440	Jef Schultz	
3441	Elaine Shuster	
3442	Jody Gibson	
3443	russ ziegler	
3444	Thomas Pintagro	
3445	Jeanne Marple	
3446	Lisha Doucet	
3447	Barbara Hoch	
3448	Willa Abel	
3449	William Gies	
3450	Mary Koss	
3451	Dita Skalic	
3452	Peter Souza	
3453	Elaine Donovan	
3454	George Bilyeu	
3455	Pam Evans	
3456	C G	
3457	CHRISTINA VAN BEVEREN	
3458	Chance Rearden	
3459	Susanne Kiriaty	
3460	William Geenen	
3461	Tracy Shortle	
3462	Gabrielle Broder	
3463	Geoff Yates	
3464	Richard Paradise	
3465	Laurel Bergman	
3466	Grace Wong	
3467	Janice Mackanic	
3468	Michael Toobert	
3469	Lynn Cardiff	
3470	Jared Cornelia	
3471	Stephanie Bilenko	
3472	Cynthia Zaferatos	
3473	Joe Thompson	
3474	Cigy Cyriac	

Submission ID	Name	Organization Name
3475	Alexandre Kaluzhski	
3476	Sarah Sallan	
3477	Marsha Adams	
3478	John Kolakowski	
3479	Daniel Perrone	
3480	Jonathan Chuzi	
3481	Rick Pearson	
3482	William Ryan	
3483	Jack Heeter	
3484	William Wollner	
3485	Larry Siglin	
3486	Alfred WOLF	
3487	Leo Burke	
3488	Eric Edwards	
3489	Joy Keithline	
3490	Michael Larkin	
3491	Chris Paterson	
3492	John Jackson	
3493	Susan Baker	
3494	Carol Gordon	
3495	John and Virginia an Kunz	
3496	James Hipp	
3497	Michael Blodgett	
3498	David Henderson	
3499	Suzanne Yeaman	
3500	Barbara Johns	
3501	Arthur Payne	
3502	Andrew Jackson	
3503	Lindsey McNeny	
3504	Ken McWatters	
3505	J Michael Pinc	
3506	Catherine Hattaway	
3507	James Harter	
3508	William C. Valaika	
3509	Doreen Davies	
3510	D R	
3511	Joyce Overton	
3512	Sandra Diaz	
3513	M. Virginia Leslie	
3514	Carla Holguin	
3515	Holly Stuart	
3516	Nicholas Lenchner	
3517	A Winser	
3518	Cathy Herzog	
3519	Ben Horner-Johnson	
3520	Rochelle La Frinere	
3521	Amanda Yoder	
3522	Gwenn Schemer	
3523	Joshua Pechulis	
3524	STELLA COAKLEY	
3525	Marlene Pratto	
3526	Mary Ann Huckabay	
3527	karen preuss	
3528	Pamela Berg	

Submission ID	Name	Organization Name
3529	John Benschoter	
3530	Vince Mendieta	
3531	Sally McKee	
3532	Maureen Porcelli	
3533	Rev. Allan B. Jones	
3534	Elsy Shallman	
3535	Diane Bisset	
3536	Kevin Bissonnette	
3537	E.S. Schloss	
3538	Marianne Lappin	
3539	Christian Kuenn	
3540	Deborah Dahlgren	
3541	Carolyn Vaughan	
3542	Claudia Bloom	
3543	Charles Winter	
3544	Michael Bievenouer	
3545	Kim Krupinski	
3546	Beti Webb Trauth	
3547	Tom Rarey	
3548	Raquel Quintana	
3549	Brian Otto	
3550	Lynette Bech	
3551	Hattie Robinson	
3552	Carolyn Cruz	
3553	Lynn Shoemaker	
3554	Cheri Laos	
3555	Karl Steen	
3556	Steve Zelman	
3557	Priscilla Rocco	
3558	James Chirillo	
3559	Felix Lee	
3560	A. Armstrong	
3561	Ranald MacKinnon	
3562	Melissa Mazias	
3563	Ledlie Bell	
3564	Ballinger Kemp	
3565	Arthur Gilroy	
3566	Marie Wakefield	
3567	Michael Garitty	
3568	Gerry Masurat	
3569	Michelle Krueger	
3570	Brittney Rice	
3571	Jamie Kitson	
3572	Richard Carvel	
3573	Patricia Vance	
3574	Judy Kushner	
3575	Sirina Sucklal	
3576	Lauren Rapp	
3577	Nick Lovro	
3578	Joan Lewin	
3579	Robert Reed	
3580	Ronald Cochran	
3581	Rhonda Patern	
3582	Sam and Connie Marquez	

Submission ID	Name	Organization Name
3583	Dinah Fogel	
3584	Philip Ratcliff	
3585	Alison Hill	
3586	Robin Murphey	
3587	Zachary Todd	
3588	Kimberly Teraberry	
3589	Ricky Butterfass	
3590	Dana Wullenwaber	
3591	Eileen Massey	
3592	Adrian Fried	
3593	Robert Weingart	
3594	Jane Ariel	
3595	Adama Hamilton	
3596	Thomas Wilson	
3597	Sherry Sites	
3598	Ruth Burman	
3599	Susan Hathcock	
3600	Matthew Falconer	
3601	Jenni Reis	
3602	lloyd reynolds	
3603	Michelle Buerger	
3604	William Haas	
3605	Peter Martin	
3606	Deborah Votek	
3607	Harriet N Bagnall	
3608	Guy Chan	
3609	Lynn Murrell	
3610	Karen D Felts	
3611	Randy Kliewer	
3612	Amy Watrous	
3613	Nicholas Jurus	
3614	Sarah Peters	
3615	Robert Mulcahy	
3616	Michael LaBrecque	
3617	Dana Palka	
3618	Kristina Lamons	
3619	Donald Johnson	
3620	Xueyi Lu	
3621	Kathleen Obre	
3622	John Robey	
3623	Graham Mitchell	
3624	Stephen Hutchinson	
3625	Xochitl Gonzalez	
3626	Chris McCully	
3627	Ronald Martin	
3628	Megan Lachapelle	
3629	Kevin Hearle Ph.D.	
3630	Vic Wu	
3631	Aarow S. Ellis	
3632	David Lax	
3633	William Stern	
3634	I Danilovs	
3635	Jason Catalano	
3636	John Massung	

Submission ID	Name	Organization Name
3637	David Seldin	
3638	Don Deck	
3639	Laura Haule	
3640	Susan Picard	
3641	Stephen Koepp	
3642	R C	
3643	Kate Ague	
3644	Steve Vizecky	
3645	Laura Chinn-Smoot	
3646	Sally Rue	
3647	Mike Andrewjeki	
3648	John Oda	
3649	Hugh Ballem	
3650	Mary Lorain	
3651	W Crist	
3652	Eric Sheppard	
3653	Suellen Tozzi	
3654	Beverly Spector	
3655	Shelley Freese	
3656	Eric Rosenbaum	
3657	Melissa Davis	
3658	Pietro Poggi	
3659	Rebecca Vardiman	
3660	Teresa Daylight	
3661	Austin Fite	
3662	Johanna Kelly	
3663	Karen Naifeh	
3664	Yung Marc	
3665	Diane and Tom Mader	
3666	Jason Suplizio	
3667	Barry Stover	
3668	Barbara Rosenkotter	
3669	Rick Gilbert	
3670	JACK SPARKS	
3671	Terry Tedesco	
3672	Clyde Burton	
3673	Sheila Desmond	
3674	Joseph Ferkler	
3675	Sabrina Sarne	
3676	Raquel Cubero	
3677	Kathleen Powell	
3678	Pieter Hull	
3679	Jeanne Saint-Amour	
3680	Daniel Butler	
3681	elizabeth pearcy	
3682	Brian Reynolds	
3683	Richard Rothstein	
3684	Deborah Walker	
3685	Bruce Reinik	
3686	Suzanne Hodes	
3687	Valerie Stanik	
3688	Sheila Pereira	
3689	John Haran	
3690	Allen Korth	

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3691	Mary O'Neill	
3692	Pamela Vangiessen	
3693	Keith Hall	
3694	Linda Wiley	
3695	Mary Lyda	
3696	Albert Ruminski	
3697	Marty Mason	
3698	Maureen Condon	
3699	Lauren Murdock	
3700	Patrick Soby	
3701	Barb Draper	
3702	Carey Horwitz	
3703	Karl Reisel	
3704	Hope mcdonnell	
3705	alice slater	
3706	Gerry Milliken	
3707	Nicolas J S Davies	
3708	Megan Lachapelle	
3709	Jay Tarler	
3710	Laurie Leland	
3711	Rebecca Savage	
3712	ROBERT M COHEN MD	
3713	Stephen Weissman	
3714	Christian Camphire	
3715	SARA HECK	
3716	Carol Oller	
3717	Jim Wells	
3718	Daniel Sierra	
3719	Steve Keim	
3720	Melinda Fritsch	
3721	Ken Sherman	
3722	Bryan Cahill	
3723	Dustin Dalman	
3724	Karen Conyngham	
3725	Richard Guier	
3726	Michael McManus	
3727	Mary McCauley	
3728	Tommy Killingsworth	
3729	Josh Gilbert	
3730	Bryan Clampitt	
3731	George Riley	
3732	Irene Gnemi	
3733	S Zz	
3734	Pamela La Rue	
3735	Nancy Ward	
3736	Ellen Homsey	
3737	Gregory Freeman	
3738	Carlos Arnold	
3739	Douglas Frye	
3740	Lise Fischer	
3741	Larry Wenger	
3742	Brian and Rita Cohen	
3743	Diane Post	
3744	Sidney Hubener	

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3745	Ruth Robertson	
3746	James Borden	
3747	Mary M Kalinowski	
3748	Andrew and Kathleen Wittenborn	
3749	RICHARD L Rowe	
3750	Mary L Sanders	
3751	Carole Smith	
3752	Pat Flahart	
3753	Matthew Franck	
3754	C. M. Smiley	
3755	Valeriya Efimova	
3756	Kathryn Dittmore	
3757	Jolyne Kane	
3758	Maria Lubienski	
3759	Marianne Frusteri	
3760	John Lucas	
3761	James Loppnow	
3762	Thomas Hicks	
3763	Charlotte Feck	
3764	Eileen Hunt	
3765	Lee Juskalian	
3766	Jan Mares	
3767	Jesse Bernhardt	
3768	christine etapa	
3769	Marilyn Maurer	
3770	Rebecca Lippmann	
3771	Cheryl Sheldon	
3772	Chemen Ochoa	
3773	Robert Beverly	
3774	Jay Satterwhite	
3775	Joyce Lynch	
3776	Brent Barnes	
3777	Louanne Stratton	
3778	Sarah Andrews	
3779	Carole Gonsalves	
3780	Cherie Holman	
3781	Robert Kittredge	
3782	Marcy Jean Brenner	
3783	Ronnie Zuckerberg	
3784	Frederick Blosser	
3785	Robert Russo	
3786	Gail Melhado	
3787	Robert Choo	
3788	Annie Belt	
3789	Luis Gonzalez-Reimann	
3790	David Dexter	
3791	John Cox	
3792	Ashley Ouellette	
3793	Mike Wallace	
3794	Carolyn Haupt	
3795	Barbara Brockway	
3796	Janet Delaney	
3797	Dee Ann Wilson	
3798	Robert Lyons	

Submission ID	Name	Organization Name
3799	Loretta Hucks	
3800	Beverley Patrick	
3801	Keiko M.	
3802	Davis Montalvan	
3803	Pascale Macleod	
3804	M. K. Russell	
3805	Michael Nutini	
3806	Cammy Colton	
3807	Carey Suckow	
3808	John Everett	
3809	Bonnie McGill	
3810	Bruce Gundersen	
3811	Vincent Hoagland	
3812	Lyle Austin	
3813	Ann Gardner	
3814	RACHEL RAKACZKY	
3815	Pat Pire	
3816	Ellen Webster	
3817	William C Bradbury	
3818	Joanne Nastasi	
3819	Brian Wright	
3820	Nancy J Parton	
3821	Melanie Baldi	
3822	Doug Strand	
3823	Vanessa Quintero	
3824	Patricia Keoughan	
3825	Ida Perez	
3826	Norman HELDBERG	
3827	Susan Torres	
3828	Rachel Rade	
3829	Marie Annette Burkart	
3830	Mark Maher	
3831	Kristin Carlson	
3832	Betsy Wolf	
3833	Ira Gerard	
3834	Don Bliss	
3835	Sheila Johnson	
3836	Dan Stebbins	
3837	Peter von Christerson	
3838	Pablo Voitzyk	
3839	Kathy Kelty	
3840	Luke Tuxedo	
3841	Danuta Radko	
3842	Christopher Ebert	
3843	William April	
3844	John Pearson	
3845	Anne Little	
3846	Linda Blodgett	
3847	Gayle Sprague	
3848	Patricia Howie	
3849	Billy Hamm	
3850	Theodora Boura	
3851	Genevieve Fujimoto	
3852	Ravid Raphael	

Submission ID	Name	Organization Name
3853	Kenneth Wright	
3854	Wendy Dodd	
3855	nancy auker	
3856	Kenward G. Campbell II	
3857	Jamie Green	
3858	Dave Hawkins	
3859	Eric Overstreet	
3860	Pete Cumming	
3861	Paula Adams	
3862	Christina Kirk	
3863	Scott Henson	
3864	Gracie Lang	
3865	Tod Boyer	
3866	Selina Garcia	
3867	David Heiden	
3868	Rosemarie Chowning	
3869	Michelle Pavcovich	
3870	Dan Schneider	
3871	James Cleek	
3872	Bonita Schwartz	
3873	Leslie Simon	
3874	Duncan Brown	
3875	Jim H	
3876	G. G. Johnson	
3877	William Johnson	
3878	Grant Wilson	
3879	Donald Priest	
3880	Nick Thielker	
3881	Carol Short	
3882	Cara Gubrud	
3883	Joshua Andersen	
3884	Kylara Hunter	
3885	Lynn Glorieux	
3886	Ralph Becker	
3887	V Mangum	
3888	Carol Schmidt	
3889	Ann Sextro	
3890	Christine Lytle	
3891	Susan Harris	
3892	Patricia Heffron-Cartwright	
3893	Richard Skinner	
3894	Marta Boyett	
3895	Alana Hendrickson	
3896	Keith Baldwin	
3897	Nona Weiner	
3898	Ed Atkins	
3899	Lynn Scott-Smith	
3900	Al Krause	
3901	Yasuyuki Owada	
3902	R. Temple	
3903	Deborah Santone	
3904	Jenna DiFeo	
3905	Patricia Tice	
3906	Daniel Alesandro	

Submission ID	Name	Organization Name
3907	Maria Venidis	
3908	Sanna Randolph Thomas	
3910	Darryl Slattengren	
3911	David Aleff	
3912	Laura Rich	
3913	Sharon Walker	
3914	Dimitri Stoupis	
3915	Derek Aleff	
3916	Joan Thomas	
3917	coleen garrity	
3918	Lisa Zales	
3919	Richard Vietor	
3920	William Heerd	
3921	Paula Szilard	
3922	Karen Rudy	
3923	Susan Olive	
3924	Joseph Alicea	
3925	Sasha Jackson	
3926	Brad Nelson	
3927	Desiree Nagyfy	
3928	Sandra Cadena	
3929	Sandra Robnett	
3930	Rosalie McVay	
3931	Karen Berger	
3932	John V. Murphy	
3933	Henry Bennett	
3934	William Doolan	
3935	Lisa Gonzalez	
3936	Lois Nottingham	
3937	Russell Novkov	
3938	Michelle Alvare	
3939	John Simanton	
3940	Lois Belser	
3941	Juan Olivo	
3942	Jim Self	
3943	Ronit Corry	
3944	tim Nelsen	
3945	Wilma Hendriks	
3946	Dona LaSchiava	
3947	Kara Gallant	
3948	Robert Albers	
3949	David LaVallee	
3950	Ken Schory	
3951	Amy Spencer	
3952	Mark Brooker	
3953	Daphne Dixon	
3954	Rick Sibson	
3955	Gary Alderette	
3956	Lisa Whipple	
3957	Ronnie Bolling	
3958	dana Bleckinger	
3959	Andre Schwartz	
3960	Barbara Crofford	
3961	Juanita Hepler	

Submission ID	Name	Organization Name
3962	Barbara Wood	
3963	Heather Davidson	
3964	Rex Messick	
3965	Rusty Glicksman	
3966	Ann McCabe	
3967	Ailsa Hermann-Wu	
3968	Sandra Burnett	
3969	Suzanne M.	
3970	Beth Achey	
3971	Pru Moore	
3972	Jim Carnal	
3973	Maria Cristina Beato-Lanz	
3974	Ana Reyes	
3975	Maria Everett	
3976	g clemson	
3977	Roy O'Connor	
3978	Phyllis Schmidt	
3979	Paul Schmidt	
3980	Dustin Crook	
3981	Sue E	
3982	Joleen Siebert	
3983	anne baldwin	
3984	P Sullivan	
3985	LARA LORENZ	
3986	Diane Falk	
3987	Jody Leete	
3988	Susan Schorin	
3989	Gwendolyn Kent	
3990	Linda Woodward	
3991	T Hildebrandt	
3992	Patricia Dishman	
3993	Kelley Coleman-Slack	
3994	Paul Henderson Henderson	
3995	Annette Newton	
3996	Matt Cornell	
3997	Sean Hagstrom	
3998	Lisa Gordon	
3999	Gail Richardson	
4000	Judy Jolin	
4001	Mary Lou Smith	
4002	T Mo	
4003	Ann Babb	
4004	Maryann Barulich	
4005	Monroe Head	
4006	Craig Marburger	
4007	Steve Blanke	
4008	Jennifer Freeman	
4009	Atiah Azhar	
4010	Barbara Briemer	
4011	Brian Zidian	
4012	M S Dillon III	
4013	Dave Gordon	
4014	Sid Jones	
4015	Don Briggs	

Submission ID	Name	Organization Name
4016	G M	
4017	Bob Hannigan	
4018	Raymond Bissonnette	
4019	Cheryl Olsen	
4020	Terry Phelan	
4021	Yuana Blanke	
4022	Crystal Brunelli	
4023	Fawn Toth	
4024	Brian Miller	
4025	Rick Easton	
4026	Alison Gimberlein	
4027	Sarah Hafer	
4028	Richard Jandoli	
4029	Barbara Smith	
4030	Charlene Elgart	
4031	Irma Bobroff	
4032	Sandy Kienzle	
4033	Courtney Hernandez	
4034	Kathryn Tomaschik	
4035	Jodi Rodar	
4036	Joan N. Poole	
4037	Mike Mooney	
4038	Hia Rubenstein	
4039	Cynthia Stone Unger	
4040	P.P. Soucek	
4041	Joel Scharf	
4042	Gary Warner	
4043	Ruth Sherer	
4044	Ron Sobchik	
4045	Neil Brown	
4046	Sandra Villavicencio	
4047	M. Brakke	
4048	Rick Almada	
4049	Barbara Boltz	
4050	Sherry Price	
4051	Shirley Schmidman	
4052	Todd Dell	
4053	Arlene Anderson	
4054	Kirk Leonard	
4055	Gail Powell	
4056	Rondane Hollar	
4057	Ben Moore	
4058	Anne Fisher	
4059	Karen Varney	
4060	Richard McCombs	
4061	Paul Groner	
4062	Dorothy Wyatt	
4063	Carolyn Sperry	
4064	edward drinkwater	
4065	Paul Teshima	
4066	Dennis Miller	
4067	Bruce Peters	
4068	Tom Gourley	
4069	Richard Stack	

Submission ID	Name	Organization Name
4070	Pat Bennett	
4071	Nancy Nozora	
4072	HARVEY BERMAN	
4073	Joanne Franchi	
4074	Robert Malfucci	
4075	Pamella Farley	
4076	Joyce Frye	
4077	Joseph Dadgari	
4078	Frank Driscoll	
4079	Susan Anduskey	
4080	Mil Drysdale	
4081	Debra Hand	
4082	Kathleen Mireault	
4083	Renee Stockdale-Homick	
4084	Ron Hansel	
4085	Nick Scarim	
4086	Todd Cisna	
4087	J Kelly	
4088	Pamela Vourosallahan	
4089	Helen Pierce	
4090	Sandra Brouillette-Jobe	
4091	Gonzales Gonzales	
4092	Kate Elsley	
4093	Jennifer Nowacki	
4094	Pamela Davidson	
4095	Philip Hult	
4096	September Steinolfson	
4097	bruce hirayama	
4098	Susan Watts-Rosenfeld	
4099	Steve Knutzen	
4100	Stephen Bailey	
4101	James Parks	
4102	Elizabeth Young	
4103	D Burn	
4104	Elaine Dompert	
4105	Steve Ryan	
4106	Deanna Simmons	
4107	Pierre Schlemel	
4108	danielle charney	
4109	Maya Kurtz	
4110	Bruce Ross	
4111	Nancy Cencula	
4112	Christine Denning	
4113	David Sprowls	
4114	David Hammond	
4115	Saletha Isaacson	
4116	C H	
4117	Mel Lopane	
4118	Elizabeth Willis	
4119	Kathleen Dolson	
4120	Sue Lambert	
4121	Raymond Mlynczak	
4122	Traci Turner	
4123	William Vassar	

Submission ID	Name	Organization Name
4124	Martin Becker	
4125	Georgeta Burca	
4126	Gayle Fieldgrove	
4127	David McCracken	
4128	Suzanne Livingston	
4129	Verona ReBow	
4130	Rosmary Mancuso	
4131	Phyllis Schmidt	
4132	James Maguire	
4133	Pat Frost	
4134	frank belcastro	
4135	Janice Dowling	
4136	D. Hooker Hailstone	
4137	Susan Muller	
4138	Shauna Sparlin	
4139	David Castle	
4140	Alex Vasquez	
4141	Ming Ong	
4142	debbie thorn	
4143	Debbie Friesen	
4144	Robert Hodge	
4145	Jim Watkins	
4146	Matthew Klimczak	
4147	Tina Ann	
4148	John Coughlin	
4149	sandra garcia	
4150	Douglas Meyer	
4151	Giovannina Fazio	
4152	Donna Allen	
4153	Julie Squire	
4154	Elizabeth Walters	
4155	Stuart Weiss	
4156	Andrew Phillips	
4157	Tracey Loyd	
4158	E Schramm	
4159	John Kenton	
4160	J. Spencer Lake	
4161	steven shroder	
4162	Cheryl Costigan	
4163	Nezka Pfeifer	
4164	Elise Varon	
4165	Dan Nelson	
4166	hans lashlee	
4167	Jan Charvat	
4168	Diane Hise	
4169	Robert Racine	
4170	Daniel Lee	
4171	Linda Rea	
4172	Beverly Mitchell	
4173	Maryellen Holmes	
4174	Sheryll Punneo	
4175	Charlene Woodcock	
4176	Vincent Campisi	
4177	Paula Lemay	

Submission ID	Name	Organization Name
4178	Jenny Latham	
4179	Keith Rosen	
4180	Don Crevie	
4181	Martin Hecht	
4182	Scott Young	
4183	Maree Penhart	
4184	Don Doty	
4185	Jeffery Green	
4186	Jo Roehrig	
4187	Jon Hager	
4188	Michael Love	
4189	Sylvia Rieder	
4190	Fergus Marshall	
4191	Katherine Platt	
4192	Catherine Nichols	
4193	Larry Heliker	
4194	Debra Garoutte	
4195	Audrey J Aabey	
4196	Tony Fuller	
4197	Barbara Smyth	
4198	Jan Rancatti	
4199	AURORA INSURRIAGA	
4200	Douglas Cooke	
4201	Roselyn Heil	
4202	John Beavin	
4203	Patti Babore	
4204	Cliff DeVries	
4205	Amy Dalporto	
4206	Kathryn Lemoine	
4207	James Kirks	
4208	Sheila Siegel	
4209	Katherine Dander	
4210	Mary Bissell	
4211	Cheryl Alison	
4212	Querido Galdo	
4213	Sally Cloud	
4214	Craig Parker	
4215	Janice Mouton	
4216	David Gardner	
4217	Gene Herman	
4218	fran Siegfried	
4219	Kenneth Ford	
4220	Robert Gall	
4221	Carmen Nieves	
4222	Jim Barber	
4223	Carol And Barry Meehan	
4224	Sandra Franz	
4225	Jennifer Loch	
4226	Michael Nelson	
4227	L V	
4228	jude crump	
4229	Letitia Noel	
4230	Richard Davis	
4231	James Dinsmore	

Submission ID	Name	Organization Name
4232	Jacqueline Romo	
4233	Inara Platt	
4234	Kevin Glover	
4235	Nicholas Falletta	
4236	Bonita Shea	
4237	Peter reimer	
4238	Ken Walsh	
4239	Elizabeth Wallace	
4240	Inara Platt	
4241	ingeborg glier	
4242	Jane Centers	
4243	Linda McNair	
4244	Beth Sproehlich	
4245	Dave Searles	
4246	Cathy Sleva	
4247	Darla Austerman	
4248	Patricia Christensen	
4249	jeri ichikawa	
4250	Nancy Schuhrke	
4251	Sharon Greenrod	
4252	Amy Biggs	
4253	Elizabeth Chacich	
4254	William Maynard	
4255	Jeffrey Russell	
4256	Jeffrey Watson	
4257	Gonzalo Lopez	
4258	Barbara Ierulli	
4259	Andrew Shymkiw	
4260	Trish Dobereiner	
4261	Lauren Felicione	
4262	Peter Curia	
4263	George Ferrell	
4264	Irene Osten	
4265	Jennifer Harris	
4266	Stephen Kirby	
4267	Susan Bernat	
4268	sarah apfel	
4269	Regina Leeds	
4270	Maryann Green	
4271	Liana Lang	
4272	Janet Lee Beatty	
4273	David Stewart	
4274	John Phelan	
4275	Shirley Jenkins	
4276	nancy miller	
4277	Sarah Reed	
4278	Frances Schneider Liau	
4279	Coral Shaffer	
4280	Donna Pielaszczyk	
4281	David Rechs	
4282	Robert Mitchell	
4283	Judith and Michael McCullough	
4284	John Rogers	
4285	Pati Tomsits	

Submission ID	Name	Organization Name
4286	Daniel Podell	
4287	Eric Hensgen	
4288	Carla Cherry	
4289	Bill Barber	
4290	Sandra Beynon	
4291	Michael Malloy	
4292	alena Jorgensen	
4293	Robert Childers	
4294	Bev Thomas	
4295	Ahren Audette	
4296	Michael Maloney	
4297	Eugene Gorrin	
4298	Mary Seegott	
4299	Martha Spencer	
4300	Seemin Qayum	
4301	William Merigan	
4302	Yvonne Zinter	
4303	Afshin Sadeghi	
4304	Jessica Cresseveur	
4305	Kimberly Fitzpatrick	
4306	Philip Shook	
4307	Heath Hancock	
4308	Ernesto Marquez	
4309	Guy Perkins	
4310	Mary Cellucci	
4311	Allen Myers	
4312	Amanda Lowe	
4313	John Steponaitis	
4314	Benvineto Watson	
4315	Steven Rood	
4316	Elizabeth Adan	
4317	Mark Kehl	
4318	Rocio Muhs	
4319	Diane Black	
4320	Timothy McLaughlin	
4321	Ln Stein	
4322	Kellie Miller	
4323	David Hancock	
4324	Robert Fox	
4325	Ruth Kay Souder	
4326	Jason Calvert	
4327	Beverly Antonio	
4328	Bo Baggs	
4329	Stephen Day	
4330	Pete Harvey	
4331	Miriam Hemphill	
4332	Diane Lamont	
4333	Kathy Grissom	
4334	Bonnie Staats	
4335	Marilyn Waltasti	
4336	Jeremy Garrett	
4337	Miriam Hemphill	
4338	Heather Marcus	
4339	William Wurtz	

Submission ID	Name	Organization Name
4340	Miriam Hemphill	
4341	Lisa Porter	
4342	Leslie Byrnes	
4343	Deborah Bancroft	
4344	Sandra Korn	
4345	Robert Hirsch	
4346	Randy Gerlach	
4347	Gael Faller	
4348	wilma Ingram	
4349	Anne Little	
4350	Barry Schwartz	
4351	gregory.a.. clewell	
4352	Roberta Swanson	
4353	James Sanders	
4354	Jeffrey Hubbard	
4355	Jonathan Wieder	
4356	Jennie deBeausset	
4357	Hoang Vu	
4358	Dominic Percopo	
4359	Catherine Chen	
4360	Diane Nowak	
4361	Alexa Morgan	
4362	Frank Richards	
4363	keren Kumar	
4364	Ronald Olszewski	
4365	Joanne Kaplan	
4366	Francine Kubrin	
4367	Christopher Flynn	
4368	Karen Forsberg	
4369	Diane Dorner	
4370	Jacqueline Arias	
4371	John McComas	
4372	Bancroft Poor	
4373	Sheila Freed	
4374	Laura Brody	
4375	BENNIE WOODARD	
4376	Lisa Cambron	
4377	Howard Gundlach	
4378	Laura Regan	
4379	Doug C	
4380	L Silver	
4381	Charles Fitze	
4382	Ernie Walters	
4383	Vicky VanValkenburg	
4384	John Linda	
4385	Randi Hutchinson	
4386	William Horne	
4387	Sherry Guzzi	
4388	Karen Reibstein	
4389	Jess Hernandez	
4390	Ada Ryan	
4391	Nancy Pope	
4392	Elizabeth H Anderson	
4393	Lori Olcott	

Submission ID	Name	Organization Name
4394	Donald Cragun	
4395	Deanna Johnson	
4396	Keith Notary	
4397	Linda Musmeci Kimball	
4398	madaline blau	
4399	John Gambriel	
4400	Thomas Yasaitis	
4401	Bart Ryan	
4402	James Vallejos	
4403	Dianne Lane	
4404	Andrea Pellicani	
4405	Bill Stern	
4406	Sharon Sullivan	
4407	Ronald L Jantzen	
4408	Toni Howard	
4409	Noel Barnes	
4410	Betty A Brendel	
4411	Bryan Bennett koi	
4412	Timothy La Vove	
4413	Carole H	
4414	Joseph Dangelo	
4415	Moraima Suarez	
4416	Paul Freibott	
4417	Dorris Headden	
4418	Elizabeth Merryman	
4419	Jean Kammer	
4420	Fran Maroney	
4421	Eleanor Gomez	
4422	David Robinett	
4423	Richard R. Tupy	
4424	Juliet Compagnon	
4425	Deb Staudt	
4426	Kathleen SEWRIGHT	
4427	Sherry Lewis	
4428	Leonard Peterson	
4429	Sherry Lewis	
4430	Tom Steinmetz	
4431	Gerd Schubert	
4432	bruce gordon	
4433	Richard Vreeland	
4434	Joshua Judson	
4435	Joan Hobbs	
4436	Ronald Howard	
4437	Richard R. Tupy	
4438	Dan Schwartz	
4439	bruce bauer	
4440	Linda Rakowski	
4441	Cynthia Morrell	
4442	Lyn du Mont	
4443	Harriet Shalat	
4444	LindaLee McEachronTaylor	
4445	Diana Gazzola	
4446	Sherry Lewis	
4447	Mark Bedgood	

Submission ID	Name	Organization Name
4448	Rodney Jones	
4449	Don Stutheit	
4450	Ellen White	
4451	Jessica Wardlaw	
4452	Diane St Angelo	
4453	Arthur Carter Rogers	
4454	Mark Berria	
4455	Mary Strebe	
4456	Robert Andrews	
4457	Thomas Carlisle	
4458	Demetra Tsantes	
4459	Ann Steele	
4460	Dena Turner	
4461	Ann Berndt	
4462	Dolores Guarino	
4463	Dorri Raskin	
4464	Ray Neff	
4465	Bernard Gonzales	
4466	Hector Parra	
4467	Linda Gillaspy	
4468	Linda Smith	
4469	David Doering	
4470	Lorraine Ferrara	
4471	Donald Rumph	
4472	Nancy Treffry	
4473	Harold Arns	
4474	ROBERT OBRIEN	
4475	Wanda Mylius	
4476	Louis Garcia	
4477	Shirley Huang	
4478	Judy Tucker	
4479	Paul Ajoue	
4480	Eric Jacobs	
4481	Steve C. Dennis	
4482	Theo Giesy	
4483	Barbara Diederichs	
4484	Carol Nugent	
4485	Elyse Coulson	
4486	Jessica Rocheleau	
4487	Madeleine Bell	
4488	Cindy M. Dutka	
4489	Elaine Dearden	
4490	Jacqueline Jenkins	
4491	Glenda Hamilton	
4492	Gerard Ridella	
4493	Tanya Field	
4494	brian greenberg	
4495	Kathy Senti	
4496	Brian Mitchell	
4497	Shawn Kakuk	
4498	Carey Kuhlmeier	
4499	Donna McKenzie	
4500	Brenda Harrison	
4501	James Reid	

Submission ID	Name	Organization Name
4502	Anne Bucher	
4503	Chad Rudow	
4504	Michael Bechard	
4505	Halie Hennessey	
4506	Donna Gensler	
4507	Kristy Kirkland	
4508	Anne Bucher	
4509	Annika Karlson	
4510	Colleen Lobel	
4511	Coleen Flory	
4512	Nancy Bixler	
4513	Joseph Reel	
4514	Monica Stamm	
4515	Florian Maitre	
4516	Robert Blaber	
4517	Allan Johnston	
4518	Scott Burger	
4519	Elizabeth Hedin	
4520	Bob Vance	
4521	Scott Burger	
4522	Clinton Roche	
4523	Charles Looney	
4524	David Malcolm	
4525	D Smith	
4526	Jutta Schneider	
4527	Alex A. Bobroff	
4528	Sam Davis	
4529	Jennifer Fleming	
4530	Kathleen Tenney	
4531	Mary Tegtmeier	
4532	Blake Wu	
4533	Sue Whitlock	
4534	Evelyn Marencik	
4535	Klaude Ellerbe	
4536	Geoffrey Ruben	
4537	Bree M	
4538	Bonnie Miskolczy	
4539	J Stuart Wells	
4540	Melissa Sternhill	
4541	Ronald Weathersby	
4542	Marlene Lehmkuhl	
4543	Sheila Cowden	
4544	James Blauth	
4545	Glyn Bailey	
4546	Matthew Struckhoff	
4547	Gloria Skinner	
4548	Nancy Mendoza	
4549	Robin Peeler	
4550	Angela Jones	
4551	Elizabeth Carter	
4552	Leann Turley	
4553	Sheila Spica	
4554	Bonnie Hearthstone	
4555	Lawson James	

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4556	colin boysel	
4557	Richard Pickard	
4558	Charles Fry	
4559	Kathleen Ruiz	
4560	Nansi Weil	
4561	Gregory Alexander	
4562	G Y	
4563	Lucy Elliott	
4564	James Kantor	
4565	Robynne Limoges Limoges	
4566	Rita Albritten	
4567	Lindsey Hudak	
4568	Bernd Myler	
4569	Jane Nachazel	
4570	Stephen Disch	
4571	Donna Delisi	
4572	Walker Everette	
4573	Ellen Asher	
4574	Charles Andros	
4575	Jerry Mylius	
4576	Travis Bertram	
4577	James Blair	
4578	Julie Hauf	
4579	Robert Mottorn	
4580	Louis Esposito	
4581	Chris Lima	
4582	Nancy Zajano	
4583	Sharon Baker	
4584	Dena Kirkland	
4585	Kevin Kreiger	
4586	Robert Lichtenbert	
4587	Andrea Gruszecki	
4588	Mazdak Farhat	
4589	Gregory Alexander	
4590	Mary Morris	
4591	Peter Dahl	
4592	Susan Hess	
4593	Sheri Deal-Tyne	
4594	Pamela Kane	
4595	Richard Sigler	
4596	Mary Rose	
4597	Fanny Whitman	
4598	Lori Stinson	
4599	Ed Cornwell	
4600	Elizabeth Anderson	
4601	Reginald spengler	
4602	Judy Shively	
4603	Katherine Arthaud	
4604	Joe Buhowsky	
4605	audrey ross	
4606	Randall Butler	
4607	Susan Haebig	
4608	Allan Campbell	
4609	Wingate Steitz	

Submission ID	Name	Organization Name
4610	Randall Butler	
4611	E.D. Crum	
4612	Terry Hoffman	
4613	Donna Lynne Polson	
4614	Girard Hayes	
4615	Jan Stone	
4616	Kaj Telenar	
4617	Marge Arnold	
4618	Debra Pena	
4619	Chris Dybala	
4620	Clark Quinn	
4621	Richard Stern	
4622	Karen Deora	
4623	Steven Waldrip	
4624	Dan Cox	
4625	Daniel Belachew	
4626	Darlin McDaniel	
4627	Brian Gray	
4628	Leigh Begalske	
4629	Cheryl McGraw	
4630	Thomas Dunlap	
4631	Lynette Rynders	
4632	Daniel Harp	
4633	Gordon Gottbeheut	
4634	Charles Parent	
4635	Joelle Porter	
4636	Jeanine Scott	
4637	Ari Reeves	
4638	Kristen Genovese	
4639	Jessica Dardarian	
4640	Mary Gilman	
4641	Colleen Taylor	
4642	Ariana Candell	
4643	Donald Sawyer	
4644	Rebecca Fitzgerald	
4645	Chris Douglass	
4646	Angela Gantos	
4647	Chris Eaton	
4648	Michele Hines	
4649	Jimmy McMillan	
4650	Travis Foster	
4651	Adrian Haemmig	
4652	Mary Daub	
4653	Gary Gilbert	
4654	Greg Destro	
4655	Lana Touchstone	
4656	Shawn Kosior	
4657	Sam Inabinet	
4658	Wayne Jessup	
4659	Kristin Logerquist	
4660	Jessica Vanhook	
4661	Stephen Donnelly	
4662	Todd Patton	
4663	Joe Salazar	

Submission ID	Name	Organization Name
4664	Marsha Jarvis	
4665	Robert Bench	
4666	Doris Kelsey	
4667	Rosemary Ward	
4668	Sonja Holbrook	
4669	Marie Barbe	
4670	Lucille Portner	
4671	Kate O'Brien	
4672	Lois Evron	
4673	Merlin Wilson	
4674	Jessica Hayes	
4675	Akiko Ichikawa	
4676	S. M. Carter	
4677	Donna Lozano	
4678	Betty Lou Winslow	
4679	Alton Crothers	
4680	Martine Tomczyk	
4681	Kathleen Moraski	
4682	Cheryl Hewitt	
4683	Brendalee Smith	
4684	Sunnie Noellert	
4685	James Patton	
4686	Michael Fine	
4687	Alexia Jandourek	
4688	Keith Christy	
4689	Lidia Lucaciu	
4690	Helen Jones	
4691	Joan Angelosanto	
4692	R Kingsbury Chase	
4693	Linda Klein	
4694	Susan Castelli-Hill	
4695	Laurie Marshall	
4696	Alice Logan	
4697	Robeert Oppenheimer	
4698	Jan Sockness	
4699	Joel Schipper	
4700	Diane Berliner	
4701	Suzanne Bryan	
4702	Paul Heller	
4703	Sharon Lautner	
4704	Amanda Guthrie	
4705	Barbara Miller	
4706	Troy Burkard	
4707	T Sensenig	
4708	Suzanne Wood	
4709	Heath Post	
4710	Phil Davidson	
4711	Cathy O'Leary Carey	
4712	Paul Riley	
4713	Leslie Stewart	
4714	Marcia Merryman	
4715	Julie Stull	
4716	Candace Laporte	
4717	Phyllis White	

Submission ID	Name	Organization Name
4718	Rita Englum	
4719	Kathleen Miller	
4720	Jennifer Smith	
4721	Jeffrey Freilich	
4722	David Hoyler	
4723	Kathy Bilicke Scher	
4724	GLENN and LORRI DONNAHOE	
4725	E Verbeck	
4726	Phyllis Wender	
4727	Dale Duda	
4728	Glen Weissman	
4729	Barbara E Corson	
4730	John Voegeli	
4731	Kenneth Cramer	
4732	Ronald Jacob	
4733	Mary Ann McDonough	
4734	Peter O'Hara	
4735	Judith Maron-Friend	
4736	Richard Monteville	
4737	Daniel Weinberger	
4738	Loyal Park	
4739	Margaret Croner	
4740	greg seibert	
4741	Diane Calkins	
4742	Michael Bailey	
4743	Andrea Nieto	
4744	Joel Serin	
4745	Ronald Drahos	
4746	Christopher Aceto	
4747	Judson Wampole	
4748	Barbara Ogden	
4749	Phillip Hope	
4750	Tina DeCarla	
4751	Sam Dornan	
4752	Michael Tillman	
4753	Phoebe Gittelson	
4754	Mary Ferm	
4755	patience terry	
4756	Graciela Huth	
4757	Anne Small	
4758	Therese DeBing	
4759	Krista Lohr	
4760	Berte Rosin	
4761	Margaret Ris	
4762	Mary lue	
4763	David Drecktrah	
4764	Aaron Veysman	
4765	Stephen Anfinson	
4766	Sylvia Lambert	
4767	Lincoln and Barbara Blake	
4768	Michael Donnenberg	
4769	Sally Jennings	
4770	Taylor Samsel	
4771	Edward Rankin	

Submission ID	Name	Organization Name
4772	Leslie Gould	
4773	Joseph T Crymes	
4774	Carole McElwee	
4775	Tamah Lettieri	
4776	Michael Almon	
4777	Stephanie Pierce	
4778	Linda Hanratty	
4779	Rebecca Reynolds	
4780	Scott Pyle	
4781	Chanit Roston	
4782	Rita Lethert	
4783	Michael Begley	
4784	Judith Mattis	
4785	Victoria De Sarno	
4786	Debra Marge	
4787	Kevin Ryan	
4788	Sheila Lynch	
4789	Paula Plasky	
4790	Lori Kachmar	
4791	Bruce Ente	
4792	Maureen Ellis	
4793	B. Chan	
4794	Eric Mattei	
4795	JOHN MESSER	
4796	Rita Jaskowitz	
4797	Peter Becher	
4798	TOM PEACE	
4799	steven nasta	
4800	Meredith Needham	
4801	Mark Poons	
4802	Marsha Lowry	
4803	Cami Hays	
4804	Alexandra Davison	
4805	Annette Fails	
4806	Stuart Weinstock	
4807	Glenn and Sandra Griffin	
4808	Fred Tashima	
4809	Shalomar Loving	
4810	Tom Atha	
4811	David Terry	
4812	Ron Price	
4813	Steven Belfield	
4814	David Jenkins	
4815	Tori Rehwaldt	
4816	Mark Sussek	
4817	Paul Zarchin	
4818	Rebecca Tisdale Welday	
4819	Hans von Briesen	
4820	Leland DeGolier	
4821	Stephen Plank	
4822	Paul Shimazaki	
4823	Margaret. M Burns	
4824	S Baker	
4825	Elizabeth Wahl	

Submission ID	Name	Organization Name
4826	Bill Staton	
4827	Gretchen Bratvold	
4828	John Boothe	
4829	James Stam	
4830	Susan Crane	
4831	Deborah Stewart	
4832	Deborah Eisenberg	
4833	AB Hartdegen	
4834	Rebecca Vesper	
4835	Nicole Wilke	
4836	Paul Counsell	
4837	William Blick	
4838	Keith L	
4839	Paul Counsell	
4840	Michael Villanova	
4841	Linda Martin	
4842	Linda Guthrie	
4843	Christopher Johnson	
4844	Susan Kornfeld	
4845	Michelle Lee	
4846	Gary Goetz	
4847	Joan Merrill	
4848	Myles Robertson	
4849	Sohum Deshmukh	
4850	Kraig and Valerie Schweiss	
4851	Lascinda Goetschius	
4852	Deb Christensen	
4853	Kevin Loucks	
4854	Melvin Rosenthal	
4855	Nancy Schultz	
4856	Norman Rehn	
4857	Melvin Rosenthal	
4858	Judy Lasko	
4859	Martha Green	
4860	Emile Boyle	
4861	Yakov Pipman	
4862	Katharine Buchholtz	
4863	David Crawford	
4864	Andrea Rabel	
4865	Laurie Loveman	
4866	Daniel Waite	
4867	Sterling Kozik	
4868	Debbie McBride	
4869	Sterling Kozik	
4870	Patrick Burton	
4871	Sterling Kozik	
4872	Johanna Kopp	
4873	Eleanor Kays	
4874	Christine Oda	
4875	More More	
4876	Timothy Furst	
4877	Sorinda Meza	
4878	Daphne Endress	
4879	B Lofgren	

Submission ID	Name	Organization Name
4880	Laurie Gates	
4881	Shelley King	
4882	Don Yaworski	
4883	Wendy Wittl	
4884	Gabriel Rojas	
4885	Lucy Trabulus	
4886	Michael Andrews	
4887	Stefan Banas	
4888	j weikert	
4889	Timothy Mullen	
4890	Helen Bailey	
4891	D'Anna Fortunato	
4892	Carol Appleby	
4893	Roselyn Shemanski	
4894	Teresa Kotturan	
4895	Patricia VanLeuvan	
4896	Thomas Warner	
4897	Paul Reimer	
4898	Marie-Claude Perigon	
4899	Allison T	
4900	Stephanie Walkowiak	
4901	Patricia Quinn	
4902	William Goldberg	
4903	Elizabeth Davis	
4904	Theodore Lawry	
4905	Susan Cox	
4906	Chandrasekhar Para	
4907	Luke Daniel	
4908	Skip Griparis	
4909	Carol Tredo	
4910	Benjamin Hart	
4911	Rollin Pizzala	
4912	Robert Brooks	
4913	Robert Meyer	
4914	Gwenda Helgert	
4915	Dennis Waterhouse	
4916	William Stone	
4917	jane Biggins	
4918	Mark Maricle	
4919	Adam Barnes	
4920	Rosalie Winard	
4921	Paulina Hernandez	
4922	Carol Bennett	
4923	Bruce Frana	
4924	Rosanna Ecord	
4925	Gary Reitze	
4926	Randall Wittig	
4927	G. Countryman-Mills	
4928	Nancy Heintz	
4929	Theron Wall	
4930	Dion Kliner	
4931	Jazmine Harvey	
4932	Mary Beck	
4933	James Foster	

Submission ID	Name	Organization Name
4934	Jackie Feazell	
4935	Jackie Feazell	
4936	Barbara Westlake	
4937	Jackie Feazell	
4938	Earle Mitchell	
4939	Nathaniel Hildebrand	
4940	Mel Kronick	
4941	Monica Montalvo	
4942	Keith Kellogg	
4943	Elizabeth Johnson	
4944	David Leavengood	
4945	Gordon Kerr	
4946	Cathy Bledsoe	
4947	Roberto Romo	
4948	Astra Kalodukas	
4949	Randall Wittig	
4950	Cleo Dioletis	
4951	Lisa Bradford	
4952	Carlos Nunez	
4953	Anita Golba	
4954	Andrew Gallagher	
4955	Sandra Denninger	
4956	Jessica Likens	
4957	Tanya Wagner	
4958	Catherine Krug	
4959	Anne Hall	
4960	John Conner	
4961	Kirsten Laage	
4962	Laura Fake	
4963	Loren Wieland	
4964	Dmitry Landa	
4965	Stephen Bogoff	
4966	Monica Rangne	
4967	Shirl Ches	
4968	richard smith	
4969	Michael Lewandowski	
4970	Richard Isenberg	
4971	Manny Jackson	
4972	Darynne Jessler	
4973	Jerry Dolcini	
4974	Lizann Keyes	
4975	Ronald Bogin	
4976	Cherie Gajewski	
4977	Sally Chappell	
4978	kurt robinson	
4979	Karen Swistak	
4980	Nicole Mola	
4981	Jane Burandt	
4982	Janet Brooks	
4983	Brent Larsen	
4984	melodie martin	
4985	James Majors	
4986	Philip Hyun	
4987	James Mccord	

Submission ID	Name	Organization Name
4988	Janet Harwell	
4989	Ed Taylor	
4990	Elisabeth Wyllie	
4991	Michael Stauber	
4992	Amy Longanecker	
4993	Susan Connors	
4994	Brian K Sutton	
4995	Deborah Allison	
4996	DAYNA COOPER	
4997	Harriet Gelfond	
4998	Nova Berkshires	
4999	Lois Finstein	
5000	Judy McVey	
5001	Debrah Chamberlain	
5002	Laura McMullen	
5003	Charlie Wallblom	
5004	Elizabeth Darby	
5005	Annette Beck	
5006	Thomas Zissu	
5007	Mike Montes	
5008	Mary Coelho	
5009	Dana Petre-Miller	
5010	Carl Reid	
5011	Dorothy Moczygemba	
5012	Tammy Shaw	
5013	Jon Benneian	
5014	Jane Varnum	
5015	Thomas Armstrong	
5016	Eileen Levin	
5017	George Stradtman	
5018	Mark Van Kirk	
5019	Robert Kline	
5020	Gayle Leberg	
5021	Tom Macchia P.A.-C retired	
5022	John Dufresne	
5023	Ann T	
5024	Gloria Schneider	
5025	Eileen Shupak	
5026	Jim Maurer	
5027	John Campbell	
5028	Sandra Boylston	
5029	Elihu Cohen	
5030	Debbie Bolsky	
5031	Katherine Robertson	
5032	Nancy Basinger	
5033	Shannon Leitner	
5034	M. Langelan	
5035	Charles Dixon	
5036	Christie Ruppel	
5037	Carolyn Trunca	
5038	KURT Steinman	
5039	Dan Fields	
5040	Paul Emerson	
5041	Marsha Byrne	

Submission ID	Name	Organization Name
5042	Bill Kellenbeck	
5043	James Schroeder	
5044	Camie Rodgers	
5045	Stacy Moranville	
5046	Don Storey Sr	
5047	Donna Jenny	
5048	Kent Barkhau	
5049	Laura Fleming	
5050	Michael Armijo	
5051	Donna Stone	
5052	john lamoureux	
5053	Susan Shouse	
5054	Vivian Dowell	
5055	Annetta Smith	
5056	Thomas Spencer	
5057	Stephen Appell	
5058	Harlan Lebo	
5059	Donald Wenger	
5060	Donna Stone	
5061	Antonia Robertson	
5062	Evelyn Verrill	
5063	Leeann Stivers	
5064	Patricia Wilson	
5065	Vicki Smith	
5066	Karl Kerchief	
5067	Stephen Durbin	
5068	Lynn Spensley	
5069	Peter Syre	
5070	Howard Miller	
5071	Melanie F Smith	
5072	Lynne Goldsmith	
5073	Rolf Best	
5074	Tom Fulmer	
5075	Martin Voelker	
5076	Jerry Fitzgerald	
5077	Bruce Stegman	
5078	Bill Williams	
5079	Carol Troisi	
5080	George F Klipfel II	
5081	Lisa Keipert	
5082	Kathleen Barnebey	
5083	Kay Reinfried	
5084	Velda Smith	
5085	carolyn massey	
5086	Kristin Ulibarri	
5087	Al Cohen	
5088	Tom Hemken	
5089	John Ferma	
5090	Dorothy Johnson	
5091	Sue Perry	
5092	Lois ARCONATI	
5093	Jerry Peterson	
5094	Shelley Sterrett	
5095	John Massman	

Submission ID	Name	Organization Name
5096	Mary E Lizie	
5097	Scott Crockett	
5099	Jason Nolasco	
5100	Peter Dugas	
5101	Ken Lundgreen	
5102	Margaret Dimitriadis	
5103	Jacqueline Eliopoulos	
5104	Debbie Mann	
5105	Ellen Gutfleisch	
5106	Katherine Prior	
5107	Ken Lundgreen	
5108	Marina Lenney	
5109	Charles Nichols	
5110	Eric Fournier	
5111	Michael Moore	
5112	Catherine Gould	
5113	Hipolito Arriaga	
5114	Angela Teixeira	
5115	Angela Stuebben	
5116	Kirsten Hicks	
5117	Robert Helvie	
5118	Joseph Finocchiaro	
5119	Peter Davis	
5120	Jane Webb	
5121	Adam Bernstein	
5122	J. Allen Feryok	
5123	Tyler Black	
5124	Sharon Switzer	
5125	Steve Schueth	
5126	Thomas Rewoldt	
5127	Lynn Mayeda	
5128	C Ortiz	
5129	Joel Hahn	
5130	Dr. Tammy King	
5131	Barbara Martin	
5132	Elizabeth Sundquist	
5133	Robert Conway	
5134	Elan Morin	
5135	Kris Head	
5136	Cheryl Rigby	
5137	Vera Nordal	
5138	Harvey Reed	
5139	Randal Marcoux	
5140	Mary Weeden	
5141	Pam Van	
5142	Chris Washington	
5143	Leonard Gerwick	
5144	Adam Udovich	
5145	Martin Slyboom	
5146	Michelle Henry	
5147	Ann Schaer	
5148	Dennis Eicholtz	
5149	Donald Weber	
5150	Michelle Boylan	

Submission ID	Name	Organization Name
5151	Paul Schmitt	
5152	Jennifer McDonner	
5153	Sheila Kojm	
5154	Leigh Walker	
5155	Patrick McCully	
5156	Duane Byrd	
5157	Steve Walsh	
5158	Steve Wendt	
5159	Judith Barnett	
5160	Scott Osborn	
5161	Ted Treanor	
5162	David Marshall	
5163	Carol Wiseman	
5164	Paul Straka	
5165	Gary Gillespie	
5166	Wendy Rosenfeld	
5167	Laurie Towne	
5168	Sherron Collins	
5169	Myra Dewhurst	
5170	George Dugan	
5171	Joanne McMillan	
5172	Victoria English	
5173	Pam Blake	
5174	Frances Oros	
5175	Janice Wilfing	
5176	Esther Shorr	
5177	Nora Polk	
5178	Sam Fargnoli	
5179	Michael OConnell	
5180	Edward Mundy	
5181	A Rossner	
5182	Dave Crawford	
5183	Edward Main	
5184	Dan Englund	
5185	Linda Thompson	
5186	Judith Peter	
5187	Andy Zamenes	
5188	Michelle Gerson	
5189	Richard Swift	
5190	Tiffany Marsh	
5191	Jim Aldrich	
5192	Bret Smith	
5193	James Znck	
5194	Kelly Thomas	
5195	Carrie Darling	
5196	Richard Payne	
5197	Paul Wilson	
5198	Diane Hashem	
5199	Leslie Leslie	
5200	Ruth Yurchuck	
5201	Francis Garren	
5202	Myrna Britton	
5203	Tab Buckner	
5204	Deborah Armintor	

Submission ID	Name	Organization Name
5205	Joan Dunham	
5206	Clement Kulish	
5207	Judy Joseph	
5208	Agnieszka Beletsky	
5209	Shannon Harper	
5210	Gail Camhi	
5211	Shannon Allsop	
5212	james norton	
5213	John Rudolph	
5214	Sarah McConnell	
5215	Sam Carpenter	
5216	Will Wallace	
5217	William Watts	
5218	Gwynyth Chmara-Huff	
5219	David Nelson	
5220	George Casner	
5221	Al Benford	
5222	Paul Macomber	
5223	Bj Lambert	
5224	Mary A Leck	
5225	Cheryl Kallenbach	
5226	Linda Baggus	
5227	Michael Garten	
5228	Linnell Krikorian	
5229	Rob West	
5230	Barbara Hogan	
5231	Joseph Sardina	
5232	Jon Archer	
5233	Dave Pierot	
5234	John Brennan	
5235	Brenda Hattisburg	
5236	Catherine Marie	
5237	Dianne Doochin	
5238	Jessi Roemer	
5239	Susan Hayes	
5240	Sahna Carmona	
5241	Kelly Riley	
5242	Michael Hopkins	
5243	Catherine Rich	
5244	David Tumarkin	
5245	Mary-Lane Baker	
5246	Theresa Kleintank	
5247	Paul Eisenberg	
5248	Susan Tischofer	
5249	Brian Brown	
5250	Rolf Johnson	
5251	Deb Bogash	
5252	Adam Preiser	
5253	Gloria Lewis	
5254	Mark Yackley	
5255	Antonino Erba	
5256	Lynne Walters	
5257	Tim Groeger	
5258	Leslie Hixson	

Submission ID	Name	Organization Name
5259	Christiane Leslie	
5260	Giulia Mannarino	
5261	Holly Frost	
5262	Yahm Reichart	
5263	KENNETH Michlin	
5264	Bill Schwarz	
5265	Hitomi K	
5266	Michelle Dugan	
5267	Roger Coates	
5268	Stephanie Kaplan	
5269	Anne Marchant	
5270	Bonnie Watson	
5271	Donald Nelson	
5272	Frank Klug	
5273	Nancy Wilson	
5274	Edward Steele	
5275	Joseph Appell	
5276	Sandra Legasey	
5277	Clay Compton	
5278	Don Miller	
5279	Grania Lindberg	
5280	Elliott Bales	
5281	Dr. J. N. Passty	
5282	Peter Hancock	
5283	jeanette capotorto	
5284	Linda Crouch	
5285	Megan Petkewec	
5286	Scott Milam	
5287	Thomas Welton	
5288	William Justis	
5289	Joe Micheletti	
5290	Stephen a Johnson	
5291	Susan Allman	
5292	Daniel Szyld	
5293	S Bower	
5294	Theresa Lehman	
5295	Dan Mortenson	
5296	Eric Scheihagen	
5297	Melanie Rugg	
5298	Dennis Ruby	
5299	Matthew Baum	
5300	Rita Gnap	
5301	Eugene DeJoannis	
5302	Jane Ward	
5303	Ann Goble	
5304	Charles Poltenson	
5305	Herman Polich	
5306	Neil Freson	
5307	Kathy Medtlie	
5308	Frederick Stamberger	
5309	Shauna Minning	
5310	Roberta Carlson	
5311	DAVID Thurow	
5312	David Bloomfield	

Submission ID	Name	Organization Name
5313	Andrew Sieff	
5314	Antoinette Emch	
5315	Stephanie Colshan	
5316	Cynthia Florenzen	
5317	Cynthia Gylden	
5318	Patricia Everly	
5319	Beverly Bach	
5320	David Cox	
5321	Ad Olansky	
5322	Mary Grant	
5323	Gladys Simerl	
5324	Michael Rouse	
5325	Beverly Witchner	
5326	MaryAnna Foskett	
5327	Cindy Janac	
5328	Katharine Riley	
5329	Sam Schwartz	
5330	NAN ARRE	
5331	Susan Galante	
5332	Corey Schade	
5333	Anne Wells	
5334	Allyn Lanoue Lanoue	
5335	Janet Finesilver	
5336	Kathryn Bosler	
5337	Delores Cuff	
5338	Jeanne Manion	
5339	Sandra Folzer	
5340	Peter Gray	
5341	Deborah Ciombor	
5342	Mary Jones-Giampalo	
5343	Trudy Cordes	
5344	Stephen Fessant	
5345	Timothy Lippert	
5346	Marie Campbell	
5347	Tawnya Smith	
5348	Susan Waters	
5349	Scott Loveland	
5350	Sandra Kuschel	
5351	Bernie Waterbeck	
5352	Sayan Banerjee	
5353	Kate Robinson	
5354	john waddington	
5355	Kimberly Kelley	
5356	Eugene Mariani	
5357	Lisa Koch Fajardo	
5358	Shari OConnor	
5359	Anita Garrison	
5360	Evelyn Lemoine	
5361	Audrey Simpson	
5362	Joan Walker	
5363	Jean Schwinberg	
5364	Patricia Bero	
5365	Pamela Kjono	
5366	Cynthia Zimmermann	

Submission ID	Name	Organization Name
5367	Lurlie Edgecomb	
5368	Steven Black	
5369	brenda lee	
5370	Mary Gladstone-Highland	
5371	Janice L Davis	
5372	Joel Flank	
5373	Lucinda Murphy	
5374	Paul Alfieri	
5375	Maria Hilario	
5376	Brian Florian	
5377	Barbara Gabbard	
5378	Judith Peabody	
5379	Jena Janek	
5380	Bill Temmink	
5381	Andrea Speed	
5382	Luc Le Noir	
5383	Carol Wiley	
5384	Jared Brenner	
5385	Roland Covert	
5386	Lynne C.	
5387	Peter Stricker	
5388	Geraldine Thompson	
5389	Alain V Berrebi	
5390	Janet McGarry	
5391	Bettina Bickel	
5392	Mark Sarnacki	
5393	Sherita Wilson	
5394	Jeffrey Kalfut	
5395	Justin Philipps	
5396	Linda Freimark	
5397	Larry Nerney	
5398	Rebecca Canright	
5399	Robert Snyder	
5400	Nancy Johnson	
5401	Diane Jones	
5402	Deb Hahn	
5403	Margo Czinski	
5404	Leonid Volovnik	
5405	Richard Camp	
5406	Nancy Johnson	
5407	Christina Warrington	
5408	Caitlin Meyer	
5409	Linda Weeks	
5410	Mary Boudreau	
5411	James Coffey	
5412	Toni Hamilton	
5413	Peggy Jakopak	
5414	Lara Eventide	
5415	Kenneth Rinehart	
5416	Judy L.	
5417	Frona Vicksell	
5418	George Reinhart	
5419	Scott Crass	
5420	Natacha Lascano	

Submission ID	Name	Organization Name
5421	David Bryan	
5422	Kristy Rotermund	
5423	Eric Lind	
5424	JL Charrier	
5425	Gale Hunt	
5426	Richard Fehr	
5427	Emma Houseman	
5428	Robert Rogers	
5429	Michele Roberts	
5430	Tim Oswald	
5431	Kathleen Boyd	
5432	Lawrence Ford	
5433	Lindsay Merryman	
5434	Judith King	
5435	Mary Frances Stamp	
5436	Rob Seltzer	
5437	Anthea Wray	
5438	Helen Schafer	
5439	David Gustafson	
5440	sherri klingensmith	
5441	Teresa B Wise	
5442	Alexander Goasdoue	
5443	betsy newnum	
5444	Garold Barr	
5445	Adriana Gonzalez	
5446	Jonathan Tholl	
5447	Donna Dupree	
5448	Rich Panter	
5449	Kris B	
5450	Jill Lipoti	
5451	Eleanor Wilson	
5452	Linda McNay	
5453	Christy Wente	
5454	Hal Grant	
5455	George Cleveland	
5456	Jude Ulibarri	
5457	Bryan Bennett	
5458	Knud Padborg	
5459	Pat Lang	
5460	Tracey Aquino	
5461	Jacqueline Stephenson	
5462	Dave Saze	
5463	L. Zeveloff	
5464	Melissa Ramundo	
5465	Eric Olsen	
5466	J.B. Lizak	
5467	Peter Sayre	
5468	Susanne Thweatt	
5469	Joe Feinstein	
5470	William Lee	
5471	Eric Weissman	
5472	Brandy Horne	
5473	Stanley sayer	
5474	LynnAnne Lange	

Submission ID	Name	Organization Name
5475	Monica Geyer	
5476	Richard Ashton	
5477	Robert Waters	
5478	Norman Miller	
5479	Nancy Obyrne	
5480	John Guros	
5481	Bernadette Gero	
5482	Kathy Colton	
5483	Paul Marcussen	
5484	GLORIA FISCHER	
5485	Tracey Katsouros	
5486	Dave Stidger	
5487	Gerald Sircus	
5488	Melinda Thor	
5489	Paul Potts	
5490	Malinda Plog	
5491	Nora Wesley	
5492	Joyce Coogan	
5493	Patricia Horter	
5494	James Wessels	
5495	Layne Ricketts	
5496	Sandra Cobb	
5497	Catherine Dishion	
5498	Ruth Hodum	
5499	Madeline Seefeld	
5500	Franz Baumann	
5501	Connie Tate	
5502	Henry Green	
5503	Elen Jahos	
5504	Julie McKeon	
5505	Gordon Parker III	
5506	Jeffrey Evans	
5507	Barbara Marko	
5508	Richard Ohlendorf	
5509	Cherine Bauer	
5510	Anne Pavlic	
5511	Carol Ohlendorf	
5512	Harry Haddon	
5513	Terry Vaccaro	
5514	Craig Galloway	
5515	Fran Watson	
5516	J Noble	
5517	susan foley	
5518	RAINER GERBATSCH	
5519	Mindy Fisher	
5520	Kerby Miller	
5521	Sharon Stork	
5522	Joan Murray	
5523	Beth Severance	
5524	John Cook	
5525	Magda Poirier	
5526	Chet Smolenski	
5527	David Garner	
5528	Patricia Snyder	

Submission ID	Name	Organization Name
5529	John Czachurski	
5530	Gary Thomasson	
5531	Don Barth	
5532	Lawrence B. Sullivan	
5533	Peter Engonidis	
5534	Chu Rob	
5535	Nita Inman	
5536	Anne Nelson	
5537	J Trimble	
5538	Emil Aanestad	
5539	Francis Olson	
5540	Linda Matlack	
5541	Teresa Jaeger	
5542	Patricia Doyle	
5543	Bernard Bryson	
5544	Patricia Young	
5545	Carol Book	
5546	Naomi Rosenthal	
5547	Robin Craft	
5548	judy kanarek	
5549	Nancy Philips	
5550	Joel Drembus	
5551	Franklin Liu	
5552	Peter Paladin	
5553	Claudia Reed	
5554	Judith Ludwig	
5555	Gloria Rosenzweig	
5556	Lois Gunther	
5557	Harold Lazar	
5558	Denny Blum	
5559	Tammy Downing	
5560	William Johnson	
5561	Tammy Downing	
5562	Bob MacCallum	
5563	Jean Kim	
5564	Tammy Downing	
5565	C Miller	
5566	Janet McCalister	
5567	David Nikkel	
5568	luc deschaumes	
5569	Eric West	
5570	Nancy Edmonson	
5571	Christopher Hornung	
5572	Richard Lindberg	
5573	Van Van Burton	
5574	Beverly Beatham	
5575	Elizabeth Gibbs	
5576	Fred Ehlert	
5577	Caryl McAllister	
5578	Susan Campbell	
5579	Ronald Wisniewski	
5580	T. Greg Bell	
5581	Jean Kim	
5582	Bonnie Arbuckle	

Submission ID	Name	Organization Name
5583	Chris Morrow	
5584	Mark Wagner	
5585	Maria Rodriguez	
5586	Inessa Fishbeyn	
5587	Colleen Cassidy	
5588	Erna Luering	
5589	Roberts James	
5590	Martha Gorak	
5591	Sally Marone	
5592	David Arntson	
5593	Griffin McCutcheon	
5594	susan wollett	
5595	Christina Ciesla	
5596	N Leah Pompeo	
5597	Jessica Baxter	
5598	David Morrison	
5599	Jim Flint	
5600	Anne MacKinnon	
5601	Dominique Coulombe	
5602	Emiko Iguchi	
5603	David Coffin	
5604	Dawn Pesicka	
5605	Rebecca Muzychka	
5606	Dana Bonner	
5607	Dawn Pesicka	
5608	Lisa Patton	
5609	Tracy Weldon	
5610	Paul Tremblay	
5611	Carl Olson	
5612	Marion Tidwell	
5613	timothy villalobos	
5614	Atlas Robinson	
5615	Frank Ortiz	
5616	Barbara Bills	
5617	Kesra Hoffman	
5618	Ellen Pinsky	
5619	Natalie Haddad	
5620	Shari Tarbet	
5621	roberta claypool	
5622	Alice Stehle	
5623	Lawrence M Rosenberg	
5624	Steve Trammell	
5625	Kate Considine	
5626	Rama K Paruchuri	
5627	Glenn Frantz	
5628	vicki hughes	
5629	John Hiatt	
5630	Joe Weis	
5631	Richard Lee	
5632	alistair kanaan	
5633	Kate Fitzgerald	
5634	Diana Wilkinson	
5635	Frank Pfost	
5636	Mary Creighton	

Submission ID	Name	Organization Name
5637	Hazel Arnett	
5638	Jean Cannon	
5639	E Wegman	
5640	Brian Phelps	
5641	Todd Mitchell	
5642	Kathleen Eaton	
5643	Julie Anderson	
5644	Ellen Federman	
5645	Faith Conroy	
5646	Robert Check	
5647	Carolyn Clark	
5648	Robin Fellers	
5649	Esterina Bodarky	
5650	Charles Wrigley	
5651	Judith Slein	
5652	Julie Anderson	
5653	Bill Kornrich	
5654	Frank Olsen	
5655	Flo Brodley	
5656	Jill Dahlman	
5657	Joan Gugerty	
5658	Tamara Harvey	
5659	Dorothy Gaylord	
5660	Michele Paxson	
5661	Ronald Rutzky	
5662	Jan Kubiak	
5663	Joyce Grajczyk	
5664	Elisabeth Archer	
5665	Peggy Kurtz	
5666	jan scott	
5667	Martha OConnor	
5668	Jane Granzotto	
5669	Javier Del Valle	
5670	Robert Findlay	
5671	Laurie Zastrow	
5672	charles heck	
5673	Christina Wolfe	
5674	Barb Travis	
5675	George W Kriebel Jr	
5676	Ruth Reagel	
5677	Dean Sherwood	
5678	Mary Joyce Moeller	
5679	Paul Doelling	
5680	James Pearson	
5681	Crystal Whitehead	
5682	Dick Ottman	
5683	Judi Bird	
5684	Elizabeth Eggleston	
5685	Robert Rowan	
5686	Jennifer Anderegg	
5687	Carol Fly	
5688	Christy Burns	
5689	Stephen Shubert	
5690	Lynn Gazik	

Submission ID	Name	Organization Name
5691	Alex Mach	
5692	Ilya Speranza	
5693	Jim Malone	
5694	Jane Ellis	
5695	Kevin Kershner	
5696	Ethel Messuri	
5697	Kathleen Byrnes	
5698	Catherine Larsen	
5699	Cynthia McFall	
5700	edna anderson	
5701	Natalie Simon	
5702	Colleen O'Neill	
5703	Steven Zimmerman	
5704	Katherine Cote	
5705	Edna Mullen	
5706	Jenniferr Rucker	
5707	Helen Smart	
5708	Pete Hall	
5709	Ruth Neuwald Falcon	
5710	Thomas Moriarty	
5711	Ira Birnbaum	
5712	John Schnauz	
5713	Kim Tostenson	
5714	Lucy Duff	
5715	joan rost	
5716	Lawrence Newsham	
5717	Patty Duffy	
5718	Leah Berman	
5719	Joel Rogers	
5720	Susan Eikenbary	
5721	Gina Johansen	
5722	Valerie Henigson	
5723	Jamie Le	
5724	Bruce And Carol Denning	
5725	Randy Snyder	
5726	Rheta Johnson	
5727	Marc Hansen	
5728	Peggy Page	
5729	Fran Silver	
5730	Juanita Westberg	
5731	Roxann Carmean Floyd	
5732	Kris Kargo	
5733	Dottie Bell	
5734	Cathie Mestemaker-Harris	
5735	Lee Stark	
5736	Kurt Hirschenhofer	
5737	AURORA MATA	
5738	Nancy Hanson	
5739	Ellen Middleditch	
5740	Michael D'Adamo	
5741	Paul Duryea	
5742	Carol N Johnson	
5743	Nancy Herck	
5744	Sarah Ragalyi	

Submission ID	Name	Organization Name
5745	Allan Rubin	
5746	Charles Philips	
5747	Mike Pickens	
5748	Peter Stone	
5749	Nick Morrison	
5750	Roger Sothward	
5751	Charles Silverman	
5752	Robert Duncan	
5753	Andrew Wadsworth	
5754	Char Laughon	
5755	Patricia Griffin	
5756	Gary Kienast	
5757	Char Laughon	
5758	Tom Wilbanks	
5759	Carol Ellenberger	
5760	Andrea Yarger	
5761	Don Dixon	
5762	Danielle Schneider	
5763	Timmie Smith	
5764	Steve Adler	
5765	Jocelyn Stowell	
5766	DAWN BROADBENT	
5767	Boguslaw Kulesza	
5768	Gary Neu	
5769	Richard Dillman	
5770	Nancy Rone	
5771	Gary Gill	
5772	C Morris	
5773	Crystal Hart	
5774	marvin cohen	
5775	Laura Garro	
5776	Susan Shields	
5777	Carol Saul	
5778	Terry Seedorff	
5779	Paige Kimble	
5780	Della Pangborn	
5781	Catherine Johnson	
5782	Alan Weener	
5783	Andrea Bustos	
5784	Joanne Neale	
5785	CHERYL SNYDER	
5786	Angel Hissley	
5787	Andrew Willman	
5789	Richard Stern	
5790	Stephanie Benson	
5791	Robert Garrett	
5792	Patricia Kelly	
5793	Gaia Schubert	
5794	Carol Chowdhry	
5795	M K	
5796	Camille Gilbert	
5797	Nathan Mueller	
5798	Vivian Voss	
5799	Richard Wissler	

Submission ID	Name	Organization Name
5800	Shih-Cheng Chu	
5801	Patricia Blevins	
5802	Suzanne Nevins	
5803	Janet Hofmann	
5804	John Owens	
5805	Carol Scherpenisse	
5806	Amanda Heske	
5807	Sheran Powers	
5808	Michael Cloud	
5809	Shelley Hartz	
5810	Judi Burbes	
5811	Pamala Jacobel	
5812	Axel Ringe	
5813	Phil Miotto	
5814	Jane Lean	
5815	Terrie Williams	
5816	Amanda Dewey	
5817	Karen Bravo	
5818	Bryce Powers	
5819	mary n	
5820	Nelly Case	
5821	Margaret Sellers	
5822	James Nairne	
5823	Peggy Berry	
5824	Jordan Moss	
5825	Steven Hoelke	
5826	Kenny Collinson	
5827	Alys Hay	
5828	Michael Borghi	
5829	Marie Young	
5830	Judith Wright	
5831	Tom Leonard	
5832	Josephine Niemann	
5833	Michael Ranger	
5834	Pamela Spaulding	
5835	Denise Vandermeer	
5836	Barbara Brunell	
5837	dave lambert	
5838	Linda Luke	
5839	Eric Thompson	
5840	Diane Virzi	
5841	Bonnie Hughes	
5842	David McCombs	
5843	Lee Kowalski	
5844	Annie Beckmann	
5845	Joanne Tenney	
5846	Lorraine Johnson	
5847	Walter Clark	
5848	Christine Taylor	
5849	Amarilys Laguna	
5850	Steven Yankoviak	
5851	Nancy Blastos	
5852	Mike Shasky	
5853	Isabel Tirath	

Submission ID	Name	Organization Name
5854	Jill Madsen	
5855	Sandra Smallwood Beltran	
5856	Suzanne Westby	
5857	Victoria Holman	
5858	Mary T Bundy	
5859	Leonard Meyer	
5860	Stanley Scheller	
5861	Randy Walton	
5862	Thomas Martens	
5863	Bonita Staas	
5864	Ted Key	
5865	Judith Rose	
5866	Abby Cohen	
5867	Nan Wollman	
5868	Deborah Irwin	
5869	Mark Quigley	
5870	Harley Winer	
5871	John Roach	
5872	Adrien Logsdon	
5873	Carl B. and Pamela S Lechner	
5874	Chelsea Pagan	
5875	Megan Kearns	
5876	Marcus Gottlieb	
5877	Henry and Lucy Atkins	
5878	James Nordlund	
5879	Russell V Charest	
5880	Bibi Prival	
5881	Jayson Lambert-Roszak	
5882	Michael Hall	
5883	Tabor Browder	
5884	Catherine Alsafi	
5885	LINDA MCCAUGHEY	
5886	roberts mark	
5887	Elaine GENASCI	
5888	David Field	
5889	Daniel St. James	
5890	STUART WAMSLEY	
5891	Carol Niemi	
5892	Juanita Hull	
5893	Kathleen Knight	
5894	Charles Hobeck	
5895	Lee Canel	
5896	Margaret Dunlevy	
5897	Russell Lyons	
5898	Vanda Jaggard	
5899	Steven Hibshman	
5900	Janice Ballos	
5901	J Holmbeck	
5902	Howard And Judith Kator	
5903	Lynn Welch	
5904	Susan Ross	
5905	Eleanor Columbo-Meardon	
5906	Roger Blansit	
5907	Glory Arroyos	

Submission ID	Name	Organization Name
5908	Sylvia Brainin	
5909	Yvette Goot	
5910	Victor Soule	
5911	Holger Mathews	
5912	Ronald Grimm	
5913	Larry Bower	
5914	Kim Jones	
5915	Nancy Rothman	
5916	Mary Ann Arabadjis	
5917	William Hance	
5918	Mark Wildes	
5919	Zorina Weber	
5920	Laura Van Embden	
5921	Delia Frederick	
5922	Jennifer Gitschier	
5923	Thomas Crown	
5924	Michael Siebert	
5925	lawrence adrian	
5926	John Moszyk	
5927	Sandra Breakfield	
5928	James Greaves	
5929	Judith Miller	
5930	Patrick Noon	
5931	John Raugalis	
5932	Eric Wachspress	
5933	Mary Lou Crimmins	
5934	Joan Lobell	
5935	Walter Kross	
5936	Daniel Lara	
5937	Chester Mahan	
5938	Thomas Schock	
5939	MaryLee Ryan	
5940	David Downing	
5941	Lynn Hammond	
5942	Gail Mershon	
5943	john phillips	
5944	Marilyn Davis	
5945	Elisa Evett	
5946	Jill Madsen	
5947	Sheri Spain	
5948	Lee Greenawalt	
5949	Paul S. Lipton	
5950	Daniel Medrano	
5951	Mark Waltzer	
5952	Christopher Sessa	
5953	Makenzi Hadden	
5954	Emily Johnson	
5955	Rally Ershig	
5956	Robert Rice	
5957	Jesse Etelson	
5958	valentina halliday	
5959	Carol Bechtel	
5960	Kindy Kemp	
5961	Dianne Frazier	

Submission ID	Name	Organization Name
5962	John Mathwin	
5963	Ron Thomasson	
5964	Barbara Langan	
5965	Steve Petyerak	
5966	Anne Marie Smith	
5967	Michelle Darbro	
5968	Marilyn Bove	
5969	Dr A. Gardner	
5970	Chris Hayes	
5971	Wayne Laubscher	
5972	David Kersten	
5973	Laura Ehrenkranz	
5974	John Gomolka	
5975	Susan Coen	
5976	Dan Councilman	
5977	Katherine White	
5978	Sarah Robbins	
5979	Dorethea Simone	
5980	Ray Hemeyer	
5981	John Saccardi	
5982	Helen Yeomans	
5983	Dustin Sotnyk	
5984	Julie Johnson	
5985	Christopher Scholfield	
5986	Joseph Ricci	
5987	Chris Roche	
5988	Maria Miranda	
5989	Melissa Vallancourt	
5990	Sue Sullivan	
5991	William Mertz	
5992	howard and arlene leiter	
5993	Russell Culp	
5994	Harold Albers	
5995	June Davenport	
5996	Carolyn Barker	
5997	Cathie Kwasneski	
5998	Jenny Russell	
5999	Justin Meyer	
6000	Jim Klimo	
6001	Alice Alford	
6002	Julie Schubert	
6003	mike page	
6004	Joshua Michels	
6005	Robbie Mosinger	
6006	Cecilia Ansel	
6007	Mark Freitag	
6008	Lee Robinson	
6009	Bonnie Winter	
6010	Kristin Huntoon	
6011	Sue Nearing	
6012	Kim Mack	
6013	Sister Mary Schmuck RSM	
6014	Kathryn Giesler	
6015	Paul Zakrzewski	

Submission ID	Name	Organization Name
6016	Reid Bandeen	
6017	Victor Ochoa	
6018	Barbara Howell	
6019	Marcus Smith	
6020	Sam Fernandez	
6021	Judith Zivanovic	
6022	Evan Sauter	
6023	Barbara Rainsberger	
6024	Robert Limouze	
6025	Angela Hughes	
6026	William Hunter	
6027	Ann McDermott	
6028	Anthony Donnici	
6029	Lyn Doster	
6030	Katherine Gould-Martin	
6031	George Brieger	
6032	Alisa Nash	
6033	Timothy Gilbride	
6034	Maria Gabrielle	
6035	Gregory Probst	
6036	Kathleen Webster	
6037	bob ostrander	
6038	Peggy Schramm	
6039	Matthew Eager	
6040	Lorraine Moore	
6041	Sarah Kass	
6042	Frank Fedel	
6043	Rebecca Flaherty	
6044	Andrea Panaritis	
6045	Kate H	
6046	Richard McBee	
6047	Gloria Aguirre	
6048	Dominique Edmondson	
6049	r vanstrien	
6050	Kurt Schwarz	
6051	Robert Wozniak	
6052	Francis Henninger	
6053	Stephen Mead	
6054	Laura Overmann	
6055	Patricia Hunter	
6056	Samuel Morningstar	
6057	Brian Slosek	
6058	Tim Isom	
6059	Scott Chase	
6060	Jay Besig	
6061	joyce niksic	
6062	Gina Maranto	
6063	Dawn Kosec	
6064	Joan Beer	
6065	Aaron Williams	
6066	Tom Calderone	
6067	Emily Howell	
6068	Bernie Gonzales	
6069	MICHAEL FOUNTAIN	

Submission ID	Name	Organization Name
6070	Karen Clausing	
6071	Evette Andersen	
6072	Paige May	
6073	Albert Ulrich	
6074	Robert Voelker	
6075	Joseph Giambalvo	
6076	Dorothy Tharsing	
6077	Joan Murtagh	
6078	Jody Benjamin	
6079	Donald Mossman	
6080	Connie Hershman	
6081	Marcia Hoodwin	
6082	Don Hill	
6083	Sara Baker	
6084	Patricia Denby	
6085	Robert Kriesel	
6086	Kathy Simington	
6087	Sarah McNaull	
6088	Sheila Brooks	
6089	Edwin Cox	
6090	Linda Wuethrich	
6091	Jaye Trottier	
6092	Alice Arnold	
6093	Winke Self	
6094	Patricia Smith	
6095	Kevin Silvey	
6096	Kirsten Lovett	
6097	T Denby	
6098	Judith Vitaliano	
6099	Jonathan Roberts	
6100	Mary Harper Lazo	
6101	Paul Blackburn	
6102	Camala Projansky	
6103	Dr.MaryAnn and Frank Graffagnino	
6104	David Wendt	
6105	Mary Putterman	
6106	Royal Chamberlain	
6107	Sonia ImMasche	
6108	Ronald Snell	
6109	Diana Berardino	
6110	Steve Beuttel	
6111	Coette Schmidt	
6112	Marijean Dornback	
6113	Lindsey Baldewicz	
6114	Phillip Daniels	
6115	Milton Davis	
6116	V V	
6117	Sidney Herszenson	
6118	Mike M	
6119	C T	
6120	Shelley Fenwick	
6121	Kathy O'Brien	
6122	Erica Himes	
6123	melinda skinner	

Submission ID	Name	Organization Name
6124	Carlos Alvarez	
6125	Shirley Drake Byers	
6126	Miki Laws	
6127	Genevieve Santalucia	
6128	Phillip Davis	
6129	Cathy Wootan	
6130	Mark Crandall	
6131	Tim Miller	
6132	Ruthann McDermott	
6133	John Gajewski	
6134	DAVID CAMPBELL	
6135	Steve Dashner	
6136	SAUL AGUIRRE	
6137	Patricia Winkelmayr	
6138	Fred Malo	
6139	Pat Vescio	
6140	Joe Redfield	
6141	Janet Latham	
6142	Ellary Eddy	
6143	Liz Murphy	
6144	Liza Hamoy	
6145	DAVID KASTELINE	
6146	Ron Klopfanstein	
6147	Kevin Morris	
6148	Marc Silverman	
6149	Peter Veits	
6150	Chris Morgan	
6151	Nikki Harris	
6152	Marietta Scaltrito	
6153	Jude Francis	
6154	Jim Jachimiak	
6155	Kara Sherk	
6156	Liv Hempel	
6157	Kathy Welch	
6158	Iris Edinger	
6159	ERNEST FULLER	
6160	David Santos	
6161	Joan Andersson	
6162	Tania Malven	
6163	Drew Demko	
6164	Susan MacDonald	
6165	Alvaro and Leslie NIEVES	
6166	Jeffrey Stevens	
6167	Joe Hemes	
6168	Linda Golley	
6169	Carol J. Painter	
6170	Amy Curry	
6171	STEVEN Zellman	
6172	Mary Mcauliffe	
6173	James Nagengast	
6174	Keith Myles	
6175	J Polland	
6176	Marty Albert	
6177	Patricia Burton	

Submission ID	Name	Organization Name
6178	Alan Holbrook	
6179	Kelsey Keyes	
6180	Dianna Holland	
6181	Douglas Smith	
6182	Stephen Boletchek	
6183	Andrew Moritz	
6184	Adalberto. M. Araiza	
6185	William Thomas	
6186	Deborah Luquer	
6187	Richard Saunders	
6188	William Ames	
6189	Cathy Rowan	
6190	Noelle Nelson	
6191	Debbie Earley	
6192	jennifer valentine	
6193	Melinda Elkins	
6194	Noelle Nelson	
6195	Adam Hovav	
6196	Emily Hall	
6197	Ed Perkins	
6198	Jeffrey DeCristofaro	
6199	Harry Heiden	
6200	Rachel Krucoff	
6201	Karen Duda	
6202	Roderick Gregory	
6203	Carl Rod	
6204	Michael Rynes	
6205	Billy Steele	
6206	Orlyn Edge	
6207	Charles Paul Becker	
6208	David Huebsch	
6209	Julia Petipas	
6210	Sandra Monseth	
6211	Nancy Loftin	
6212	Catherine White	
6213	Robert Gore	
6214	Eric Britton	
6215	Arthur Gould	
6216	Margaret Loomis	
6217	Steve Edgar	
6218	Amy Holt	
6219	Jessica Ryder	
6220	Thomas Brenner	
6221	Shayne Osterberg	
6222	Nick Milam	
6223	Pat Whebbe	
6224	WF Clement	
6225	Marilyn Carlisle	
6226	Paula Smith	
6227	Sheila Brady	
6228	Kimberly Nelson	
6229	Amy Showers-Stone	
6230	Dusty Dodge	
6231	Stephan Lehmann	

Submission ID	Name	Organization Name
6232	John Berman	
6233	Paul Nelson	
6234	John Barger	
6235	patrick wilkins	
6236	Eleanor Weisman	
6237	Brenda Letellier	
6238	Philip Scott	
6239	Mario E Martinez	
6240	Lisle Raught	
6241	Yves Decargouet	
6242	Emily Alpert	
6243	Richard Hill	
6244	Ellen Parsons	
6245	Sheri Snyder	
6246	Bradley Seay	
6247	Christopher Gautrau	
6248	Kathryn Lambros	
6249	Dusan Lysy	
6250	Lori Morris	
6251	Betty Adams	
6252	Bob Walburn	
6253	Patricia Fouse	
6254	Romie Oplinger	
6255	Shannon Taylor	
6256	Sid Reischer	
6257	Jon Sheehan	
6258	Pam Chamallas	
6259	Kathryn Bluhm	
6260	Rena Suberg	
6261	Michele Kowalski	
6262	Michael Olenjack	
6263	Thomas Sanders	
6264	Sarah Joslin	
6265	Jeff Klein	
6266	Jeffrey Cohen	
6267	Karen Stamm	
6268	Heather Davis	
6269	Satya Kaur Khalsa	
6270	Jennifer Smith	
6271	Pamela McIntyre	
6272	Michelle and Gordon Seyfarth	
6273	Scott Dugas	
6274	Ed Robertson	
6275	Peter Hartzman	
6276	Becky Bauer	
6277	S Prazenka	
6278	Diane Sparks	
6279	Elizabeth Therkilsen	
6280	Jan Praytor	
6281	Michael Babitch	
6282	Karen Doerr	
6283	joseph Hardy	
6284	Pamela Collord	
6285	John Bruce	

Submission ID	Name	Organization Name
6286	Richard Gilman	
6287	Jon Ludlam	
6288	Martin Tripp	
6289	Margarita Haugaard	
6290	Elizabeth Seltzer	
6291	Lynn Brandon	
6292	Lisa Hammonds	
6293	Andrelene Babbitt	
6294	David Hand	
6295	Jessie Panek	
6296	John Tribuna	
6297	Mary Jane Engh	
6298	Beth Jane Freeman	
6299	Mark Lovich	
6300	Bonnie Stoeckl	
6301	Shelby Oktar	
6302	Nancy Cushwa	
6303	Marylee Brown	
6304	John Coke	
6305	Eleanor Thomas	
6306	Jordyn Boesch	
6307	Craig Penner	
6308	Amy Chisholm	
6309	Gregory Whynott	
6310	Jim And Nina Kelly	
6311	Arnold Martin	
6312	John R. Thomas	
6313	Michael Kavanaugh	
6314	Carol Dougherty	
6315	jocelyn boyce	
6316	William Rodgers	
6317	Christie Mahaffey	
6318	Nora Jaffe	
6319	Sharon Newman	
6320	d o	
6321	Erik LaRue	
6322	John Nadolski	
6323	Victoria Laird	
6324	Ann Wasgatt	
6325	c. martinez	
6326	Gay Goden	
6327	Anne Ferguson	
6328	Renee Joos	
6329	Betty Dunbar	
6330	Merja Harju	
6331	mike Butche	
6332	Michele Checchia	
6333	Joseph Byers	
6334	Tom Lago	
6335	suzanne zoubeck	
6336	Lisa Lewis	
6337	Tom Weldon	
6338	Steve Lyons	
6339	Frank Nobiletti	

Submission ID	Name	Organization Name
6340	Mary McMahon	
6341	Suzanne Hughes	
6342	Susan Abell	
6343	Jennifer Sullivan	
6344	Mary A Fleming	
6345	Van Rookhuyzen	
6346	Penny Appelbaum Goldman	
6347	Gregory V	
6348	David Duch	
6349	Mark Wigginton	
6350	Mary Downey	
6351	Peter Adams	
6352	Joe Detaranto	
6353	Susan Thurairatnam	
6354	Sylvia De Baca	
6355	Donald Hunt	
6356	Ben Brewster	
6357	joyce heyn	
6358	Steve Radcliffe	
6359	Michael Letendre	
6360	Joseph Ponisciak	
6361	Hubert Guay	
6362	Joan Mac Beth	
6363	Krista Taylor	
6364	Andre Snyder	
6365	Brian Peck	
6366	Timothy D'Agostino	
6367	Denise Schuster	
6368	Walter Schmitt	
6369	Leigh Warren	
6370	Rene Castle	
6371	Lacey Levitt	
6372	Michael Lombardi	
6373	Nick Vivian	
6374	Ellen Redish	
6375	Patrick Lewis	
6376	Kaylynn Lyon	
6377	Ashley Farreny	
6378	Beth Larson	
6379	john pasqua	
6380	Jane Shabtaie	
6381	colonel meyer	
6382	Ryan Bradley	
6383	Debra Moore	
6384	Ruth Garrison	
6385	Gretchen Corkrean	
6386	Carol Nieh	
6387	Dan Wizner	
6388	Arthur Bjork	
6389	Paul Levesque	
6390	Roxie Piatigorski	
6391	Kimberly Shaub	
6392	Robin Aitro	
6393	Marion Westgate	

Submission ID	Name	Organization Name
6394	Linda Wilshusen	
6395	Andrew Middleton	
6396	Holly Graham	
6397	Harold Enstrom	
6398	Deb Jones	
6399	Presley Garrett	
6400	Ryan Acebo	
6401	Rogene Henderson	
6402	Thom Peters	
6403	Seth Downs	
6404	Michael Kendrick	
6405	Yvonne Marley	
6406	Glen Benjamin	
6407	Frances Bell	
6408	Howard Rontal	
6409	Debra Harris	
6410	Scott Mason Mason	
6411	Glenn Novak	
6412	David Halperin	
6413	Jerome Roth	
6414	Robert Gagliardo	
6415	Vincent Da Forno	
6416	Keith Campbell	
6417	Croitiene ganMoryn	
6418	Dennis O'Brien	
6419	Tish Yarborough	
6420	Juliann Pinto	
6421	P bryer	
6422	Jim Steitz	
6423	Timothy Middendorf	
6424	Richard Zoah-Henderson	
6425	Jeri Taylor	
6426	Suzanne Hume	
6427	Sharon Madagan	
6428	Ray Stetkiewicz	
6429	Deb Lincoln	
6430	Rhonda Overman	
6431	maria wells	
6432	John Breiby	
6433	Tracy Templin	
6434	Brian Krysinski	
6435	Emilie Bracchitta	
6436	Margaret Park RSM	
6437	Becky Anderson	
6438	Mary Jo Coblentz	
6439	John Thaw	
6440	Elissa Emerson	
6441	Nancy Kissam	
6442	Dp Thornton	
6443	Gerald Chorba	
6444	Janice Gintzler	
6445	Deborah Martin	
6446	Kathy Kelly	
6447	Susan Lam	

Submission ID	Name	Organization Name
6448	Kari Jackson	
6449	bryce butler-dawson	
6450	Marie Campbell	
6451	Judy Rees	
6452	Leo Burke	
6453	Mary Skinner	
6454	Frederick Glazier	
6455	Linda Rossin	
6456	Mary Lynn Willis Parodi	
6457	Eric Carlson	
6458	C J Cota	
6459	Catherine Lavau	
6460	Peggy Bergen	
6461	Alexandra Hoch	
6462	barbara parchim	
6463	Deborah Veneziale	
6464	Richard Maynard	
6465	Don McKelvey	
6466	Karen Waltman	
6467	jonathan weinstock	
6468	P F	
6469	John Tenopir	
6470	Virginia LeBlanc	
6471	Carole Charbonneau	
6472	ROBERT MAYTON	
6473	Cheryl Pace	
6474	Maryann Smale	
6475	Lorraine Schiavi	
6476	Danette Phelan	
6477	Heather Buchanan	
6478	Lezlie Navarro	
6479	Gail Powell	
6480	Bob Farrell	
6481	Paul Garrett	
6482	Kathleen Mitchell	
6483	Sally Harrison	
6484	Chris Mosher	
6485	Cathryn Kissinger	
6486	Julie Crook	
6487	Jennifer Calvert	
6488	Jin Nothmann	
6489	Ingrid Eichenbaum	
6490	Gregory Nelson	
6491	Kristine Cassar	
6492	Nancy Sheran	
6493	Erik Zettler	
6494	Robert Grealish	
6495	Herman Schiller	
6496	Dannette DeWeese	
6497	Linda Quinet	
6498	Andra Marx-Krajchir	
6499	Peggy Detmers	
6500	Linda Hall	
6501	David Peake-Jones	

Submission ID	Name	Organization Name
6502	Sara Templeton	
6503	Jamie Clark	
6504	Lilianne and George Labbe-Babin	
6505	John Varga	
6506	Mary Pouliot	
6507	Robert L Oman	
6508	Marilyn Martin	
6509	Pat Fojtik	
6510	Damon Lynch	
6511	william coughlin	
6512	Jayne Cerny	
6513	Elizabeth Porter	
6514	Kathlene Croasdale	
6515	Brian Yu	
6516	Kevin Synan	
6517	Lee Willard	
6518	Barry Kotel	
6519	Laura Tank	
6520	Brennan Mahoney	
6521	Craig Chatburn	
6522	Mason Kocel	
6523	Michael Dilger	
6524	Linda Weiner	
6525	Green Greenwald	
6526	Roberta Engel	
6527	Kate K	
6528	Tony Momma	
6529	Richard Collins	
6530	John Papandrea	
6531	Albert Gauna	
6532	Joan Scofield	
6533	Ajax Greene	
6534	Christy Fox	
6535	John Hinnens	
6536	Talmadge Cooper	
6537	Peter Kokopeli	
6538	Jeanne Fobes	
6539	Clifford Goertemiler	
6540	Patti Litman	
6541	Bob Nutt	
6542	Bobby J. Rogers	
6543	Paul Bechtel	
6544	Sarah Krall	
6545	Christi Dillon	
6546	Michael Violante	
6547	Simone Meeker	
6548	Heather Eady	
6549	Mark Walleman	
6550	Felicity Hohenshelt	
6551	Claire Waring	
6552	Lawrence Landherr	
6553	John Reid	
6554	Elizabeth And Wayne Paulson And Mayer	

Submission ID	Name	Organization Name
6555	jordan winehouse	
6556	Ronald Kestler	
6557	Sandra Meyer	
6558	Suzy Sayle	
6559	Donna Alexander	
6560	Liberty Goodwin	
6561	Madeleine H. Peterson	
6562	Denise Halverson	
6563	Nicoletta Spedalieri	
6564	Laurine Cooke	
6565	Miriam Kurland	
6566	Karen Coffey	
6567	Miranda V	
6568	Susan Greenberg	
6569	Harriet McCleary	
6570	Eric Stiff	
6571	Andrea Frankel	
6572	Marjorie Shreve	
6573	Nanci Kelly	
6574	Anne Coelho	
6575	Elliot Daniels	
6576	Deborah Nissen	
6577	Jean Williams	
6578	Donna Glaser	
6579	Marilee Wood	
6580	shirley midyette	
6581	Ned Flaherty	
6582	David Wann	
6583	Allyn Granfors	
6584	Stephen Ross	
6585	Jeanne V. Diller	
6586	Rhys Atkinson	
6587	Doug Wingeier	
6588	Jewell Batway	
6589	Gene Hunter	
6590	Ginger Comstock	
6591	Dianne Kenosky	
6592	Robert Ruddick	
6593	David Coulter	
6594	Rich Surdyk	
6595	Mary Walls	
6596	Jo Scott	
6597	Peter Burval	
6598	Ann Wool	
6599	Glen Weisberg	
6600	Ruth Woodcock	
6601	Paul W Rea	
6602	Meg Aleff	
6603	Susan Bradshaw	
6604	Pamela Patek	
6605	Amy Heyneman	
6606	Patricia Bullock	
6607	Alexander Grennor	
6608	Pam Bixter	

Submission ID	Name	Organization Name
6609	Marc Taras	
6610	David Hermanns	
6611	Peter Aleff	
6612	Jason Edward Moore	
6613	Catherine Kladis	
6614	CHARLES LUCE	
6615	Sharon Morris	
6616	Keith Thompson	
6617	Nancy McGlothlin	
6618	John Banach	
6619	Michael Zeller	
6620	Candie Glisson	
6621	Dennise Templeton	
6622	Nell Ubbelohde	
6623	joan dobbs	
6624	Dennis Nagel	
6625	Tracy Richards	
6626	Richard Weatherhead	
6627	Cindy Risvold	
6628	Geniece Medsker	
6629	Robert Inerfeld	
6630	Dan Snyder	
6631	Denny Boehm	
6632	juan hernandez Garibay	
6633	Donald Weigt	
6634	Jim Leske	
6635	Barbara Walsh	
6636	Sharon Sullivan	
6637	Myron Mohr PhD	
6638	Stu Farnsworth	
6639	Eric Fisher	
6640	Linda Whitley	
6641	Skip Shaputnic	
6642	Roberta Read	
6643	Lisa Hopkins	
6644	Timothy Davis	
6645	Evan Jane Kriss	
6646	Kathleen Bond	
6647	Nicholas McNaughton	
6648	Greg Schmitt	
6649	Jimmy Powell	
6650	Kathleen McHendry	
6651	Robert Sullivan	
6652	Juan Isasi	
6653	Robert Stark	
6654	Dion Dion	
6655	Geness Lorien	
6656	John Cassel	
6657	Kimberly Pettit	
6658	Allen and Carol Fromowitz	
6659	Bill Bowman	
6660	Penny Hartman	
6661	Sylvia Rodriguez	
6662	elana Katz Rose	

Submission ID	Name	Organization Name
6663	Jeff Levicke	
6664	Karen Hughto	
6665	Bob Rayburn	
6666	Jerid Anderson	
6667	Ann T	
6668	Richard Bartkowicz	
6669	John Doucette	
6670	David Lock	
6671	S G Cobb	
6672	Lance Bogash	
6673	James Tucker	
6674	Andrea Jones	
6675	Stefan Taylor	
6676	BAileen McCune	
6677	Larry Cohen	
6678	Carol Lipsky	
6679	Mike Cass	
6680	John Charbonneau	
6681	Robert O'Neal	
6682	John Cairns	
6683	Junko Nakai	
6684	Bruce Clarke	
6685	Everett E Dennis	
6686	Vanessa Brown-Seay	
6687	Diane Verna	
6688	Eliza Steffee	
6689	Chris Warner	
6690	Jeff Kronick	
6691	WINSTON HUANG	
6692	Suzi Goller	
6693	Valentino weiss	
6694	Glenna Johnson	
6695	Alan Breese	
6696	Pamela Wallace	
6697	Jennifer Alberghini	
6698	Lisa Jack	
6699	John Deltognoarmanasco	
6700	Maryl Myers	
6701	Buzz Alpert	
6702	Joan Grossman	
6703	Joyce Gleason	
6704	Susan Hampel	
6705	Robert Crenshaw	
6706	Bretton Little	
6707	Robert Martin	
6708	Hector Bertin	
6709	Susan Nierenberg	
6710	Jana Theis	
6711	John McSwigan	
6712	Eric Stordahl	
6713	Paul Harrison	
6714	Michelle Sewald	
6715	Cordale Brown	
6716	Jason Kluytman	

Submission ID	Name	Organization Name
6717	Lisa Daloia	
6718	Damon Brown	
6719	William Weber Weber	
6720	Bob Schildgen	
6721	Sabine Waterkamp	
6722	Laura Glenn	
6723	Deborah Wertz	
6724	Beth Beringer	
6725	Kim Richards	
6726	Neal Ferris	
6727	Jean Wynn	
6728	Helene Herman	
6729	D. Chalfin	
6730	Joel Sacco	
6731	Ralph Bllick	
6732	Sheila Squier	
6733	Carol Myers	
6734	PHILIP CASTLE	
6735	Robert Hogan	
6736	Carol Baier	
6737	TROY TACKETT	
6738	Stewart Winchester	
6739	Richard Richter	
6740	Mark Tracy	
6741	Diana Shreves	
6742	Bruce Christopher	
6743	Michael Bchard	
6744	Norman Traum	
6745	Leslie Lomas	
6746	Paula M Jackson	
6747	Fred Winik	
6748	Marianne Flanagan	
6749	Carla Skuce	
6750	Nicole Bechard	
6751	Earl Carson	
6752	Larry Lawton	
6753	Linda Plummer	
6754	Debbie Blair	
6755	Klaus Proemm	
6756	Tina Markowe	
6757	Connie Raper	
6758	Jim Gragel	
6759	A Morton	
6760	Lowell Palm	
6761	Keith Hardina	
6762	Stephen Rosenblum	
6763	Jane Ferguson	
6764	John Champine	
6765	Doris Jackson	
6766	Deimile Mockus	
6767	john long	
6768	David Cotner	
6769	Kathleen Metivier	
6770	Susan Tabor	

Submission ID	Name	Organization Name
6771	Carol Quick	
6772	Sakuna Ganbari	
6773	Barrie Gile	
6774	Steven Miller	
6775	Kelly Fiske	
6776	Kirsten Belzer	
6777	Jim Roszak	
6778	Kathleen Margulis	
6779	Lary Vik	
6780	ED TRUJILLO	
6781	Cindy Owens	
6782	Christina Cowan	
6783	Stefan Koch	
6784	Anthony Thompson	
6785	S. E. Williams	
6786	Kwok-yin Chan	
6787	Carol Nealy	
6788	Carol Nelay	
6789	Charlotte Mullen	
6790	Rosann Lynch	
6791	M. Murray	
6792	Martha Robertson	
6793	Donna Carswell	
6794	Lester Thompson	
6795	Nancy Ward	
6796	K. Kirschling	
6797	Diane Shaughnessy	
6798	Patricia Phillips	
6799	Abby Martin	
6800	Cheryl Lamb	
6801	Kurt Keough	
6802	William Taylor	
6803	James Keenan	
6804	Linda Morgan	
6805	Priscilla Encarnacion	
6806	Dustin Dalman	
6807	Laurie Nye	
6808	Elizabeth Makiewicz	
6809	Charles Nicol	
6810	Celia Britton	
6811	Tina Loonsfoot	
6812	Susan Balaban	
6813	Brian Hicks	
6814	Vickie Gonzalez	
6815	Harvey and Evelyn Greenwald	
6816	Bonita Hickman-Kamarad	
6817	Leta Clarke	
6818	Ted Neumann	
6819	Anne Miller	
6820	Gracie Partida	
6821	Fritz Burt	
6822	Jeremy Carter	
6823	David Heffernan	
6824	HARRIET GROSE	

Submission ID	Name	Organization Name
6825	George M Melby	
6826	L Sav	
6827	David Burtnick	
6828	Joseph Ghiloni	
6829	Lew Liggett	
6830	Brenda Wagner	
6831	Martin Horwitz	
6832	Janet Handford	
6833	Brenda Agnew	
6834	David Johnson	
6835	Matthew Hartlieb	
6836	Melanie Cohick	
6837	Karin Eckelmeyer	
6838	Deborah T.	
6839	Richard McVoy	
6840	vinton gates	
6841	Sydney Benson	
6842	Susan Leibowitz	
6843	Pat Donohue	
6844	Barbara Hamilton	
6845	Sarah Galt	
6846	D'Arcy Goodrich	
6847	Julia Marie Gillett	
6848	Rod Davis	
6849	Environmental Stewardship	
6850	Bernadette Webster	
6851	Stuart Lynn	
6852	Heidi Welte	
6853	Susan Madden	
6854	Janet Rauscher	
6855	Melissa Miller	
6856	Robert Swett	
6857	Steve Box	
6858	Ben Rall	
6859	Katarina Spelter	
6860	Daniel Hawley	
6861	Andrea Zemel	
6862	Ann Williams	
6863	Cathy M Gunderson	
6864	Theresa Owens	
6865	Wallace Ransom	
6866	Mary Lester	
6867	Leslie Gould	
6868	Denise Motta	
6869	Dee Steele	
6870	Sherry Bupp	
6871	Beth Doherty	
6872	Nancy Belkov	
6873	Vickie Gonsoulin	
6874	Arlene Baker	
6875	Lynn Murphy	
6876	Julie McGuire	
6877	Scott Toland	
6878	Tom France	

Submission ID	Name	Organization Name
6879	Lynn Glasscock	
6880	Deborah Miller	
6881	Richard Schall	
6882	P.J. Carter	
6883	Michael Eichenholtz	
6884	R. Snider	
6885	Roger Hoos	
6886	Helen Thompson	
6887	David Sices	
6888	Jeffrey Fernandez	
6889	john connolly	
6890	Elizabeth Ketz-Robinson	
6891	Douglas Raelson	
6892	Arienne Bloomingdale	
6893	Dana Wakiji	
6894	John Harmon	
6895	Amanda Brewer	
6896	Walter Tulys	
6897	Mike Turner	
6898	Nora Groeneweg	
6899	Nishanga Bliss	
6900	Richard Rutherford	
6901	Elaine Tirrell	
6902	Anthony Yoder	
6903	Julie Smith	
6904	Edda Spielmann	
6905	Greg Thomson	
6906	Terri Wilson	
6907	Angela clement	
6908	Joan Hemm	
6909	Thomas Thirion	
6910	Robert Lambert	
6911	Alan Mitchell	
6912	Jean Pauley	
6913	Palmeta Baier	
6914	michael nall	
6915	Carol Sontag	
6916	Michael Mc Cormick	
6917	Jennifer Scott	
6918	Cynthia Dumas	
6919	Donald Di Russo	
6920	Betty Krikorian	
6921	Donald Cooney	
6922	Liz Erpelding-Garratt	
6923	Parker Berg	
6924	Diane Nissen	
6925	Glory A	
6926	Luci Howard	
6927	Virginia Stone-Meyer	
6928	Wendy Lewis	
6929	LynnMeta Williams	
6930	Constance Thaxton	
6931	Ann Rosenkranz	
6932	Bryn HammarstromRN	

Submission ID	Name	Organization Name
6933	Jerri Loeb	
6934	Alexis Maestre-Saborit	
6935	Crystal Mourad	
6936	jonelle Reynolds	
6937	Patricia Pruitt	
6938	Harlan James	
6939	robert richey	
6940	Katherine Aker	
6941	Hatem Khater	
6942	Diane Krell-Bates	
6943	Elizabeth Scadova Scadova	
6944	Stephen Battis	
6945	Henry M	
6946	Eleanor Kays	
6947	Kevin Courtney MD	
6948	Grover Gregory	
6949	F Wilkinson	
6950	Margaret Medford	
6951	Karen Barnes	
6952	Donald Yanulavich	
6953	Mary Filippo	
6954	Roger Schneider	
6955	Lori Williams Philipsen	
6956	Charlie Palmgren	
6957	Susan Lanes	
6958	Elizabeth Cruickshank	
6959	Anna Pratt	
6960	Jesse Bohl	
6961	Claire Williams	
6962	Marc Ruben	
6963	Wayne Richardson	
6964	Glenn Golden	
6965	Roth Woods	
6966	Sofia Okolowicz	
6967	Randall Wittig	
6968	Kelley Anderson	
6969	Joseph Van Blargan	
6970	Randall Nord	
6971	W. C.	
6972	Claire Sullivan	
6973	Corinne Monk	
6974	Karen Nelson	
6975	John McDonald	
6976	Leonard Clark	
6977	Janet Anderson	
6978	Karen Roland	
6979	Valeria Sowell	
6980	Marge Theeman	
6981	Frank Lewis	
6982	Ed Perry	
6983	Jeanne Ferrante	
6984	Deborah Fobes	
6985	Daryl Kelley	
6986	Douglas Thorley	

Submission ID	Name	Organization Name
6987	Breeanna Kelly	
6988	Lisa Hanckel	
6989	DAVID ZANARDELLI	
6990	Patricia Criste	
6991	William Hassig	
6992	Tom Hayes	
6993	Richard Franken	
6994	Robert Schatte	
6995	Ethan Levine	
6996	Fran Cohen	
6997	Maurine Elliott	
6998	Jan Peischl	
6999	Susan Head	
7000	Asghar Rowshandel	
7001	julie levin	
7002	John S	
7003	Amanda Martinez	
7004	Larry French	
7005	Jill Rosenkranz	
7006	Donna Stone	
7007	Gilia Humrich	
7009	Valerie Bell	
7010	Alan Citron	
7011	Jeffrey Bloomfield	
7012	Elaine Mendelow	
7013	Ozala Mazar	
7014	Anna Doyle	
7015	Ben Fisher	
7016	Nora Eiesland	
7017	Nora Jaffe	
7018	Natalie Clark	
7019	David Strine	
7020	Tony White	
7021	Bobby Reagan	
7022	Roger Wess	
7023	William Ames	
7024	Gerardo Razumney	
7025	Ruth Kram	
7026	Kevin Chapman	
7027	Tony Diaz	
7028	Suzanne de Seife	
7029	Leonor Molina	
7030	Sandra Kicinski	
7031	Christine King	
7032	Susan Druckman	
7033	Jesse Williams	
7034	mark russell	
7035	William Devore	
7036	Stephen Markel	
7037	Nancy Boyce	
7038	Darlene Norwood	
7039	Geoffrey Brown	
7040	Kristen E. Loomis	
7041	Lynn Raiser	

Submission ID	Name	Organization Name
7042	Gail Weininger	
7043	Bradley Hagman	
7044	Susan Von Schmacht	
7045	Saraj Hayes	
7046	Michelle Henry	
7047	Louise Scarfone	
7048	John Arnold	
7049	Alice Petersen	
7050	Michelle Henry	
7051	Ms Moonshadow	
7052	Sarah Conner	
7053	Manon Roberge	
7054	I Trigonis	
7055	Philip Shoulberg	
7056	James Stokes	
7057	Carrie Breen	
7058	dawn kenyon	
7059	Eva Marks-Curatolo	
7060	Todd Williams	
7061	Tom Nacey	
7062	Daren Brady	
7063	Joanne Britton	
7064	Donald Tanis	
7065	Robert Robson	
7066	Gary Thaler	
7067	Alina Szostak	
7068	Neil Resico	
7069	Caroline Correa	
7070	Phil Louie	
7071	Paul Novak	
7072	Rose Cripps	
7073	Linda Lee Showerman	
7074	Kate Dougherty	
7075	Denise Boldea	
7076	Bridget Wyatt	
7077	Catherine Webster	
7078	Jeffrey Hurwitz	
7079	Thomas Durst	
7080	Thomas Loizides	
7081	Lynette Ridder	
7082	Michael Will	
7083	Thomas Yocum	
7084	Norman Arnett	
7085	William Swegle	
7086	Martha Jane Adams	
7087	Natalie Blasco	
7088	Karyn Goff	
7089	Patricia Patteson	
7090	Rob Stergas	
7091	Emily Bayer	
7092	Lisa Madrid	
7093	Susaan Aram	
7094	Anne McCarty	
7095	Mark Peters	

Submission ID	Name	Organization Name
7096	Ann Fontaine	
7097	Carrie Campbell	
7098	Jessica Anderson	
7099	Lisa G	
7100	Lawrence Dingee	
7101	Robyn Lauren	
7102	CYNTHIA CALKINS	
7103	Thomas Reynolds	
7104	Maryann Barulich	
7105	Anne B. Clark	
7106	Rolf Johnson	
7107	Sue Kasprzyk	
7108	Rolf Johnson	
7109	Joseph Knack	
7110	Karl Seidman	
7111	Dan Esposito	
7112	Lucymarie Ruth	
7113	David McDougall	
7114	Debra Gleason	
7115	Carol Browne	
7116	Mark Novotny	
7117	Michael Klein	
7118	Julie Truhlar	
7119	Lucymarie Ruth	
7120	Jayne Merkel	
7121	Tom Gordon	
7122	Jane Church	
7123	W El-Ahdab	
7124	Marj Rhodes	
7125	Alfredo Ocasio	
7126	Jan Williams	
7127	Connie Howes	
7128	Elena Schroeck	
7129	Richard Henshaw	
7130	Logan Souder	
7131	Fayten El-Dehaibi	
7132	Anita Cannata Nowell	
7133	Sheila Carnegie	
7134	Carol Henning	
7135	Robert Borden	
7136	Faith Kirk	
7137	Andrew Hamilton	
7138	Joe Killian	
7139	Lydia Polomski	
7140	B Barbara Parliman	
7141	Robert Taylor	
7142	Eric Nichandros	
7143	Jessica Mitchell-Shihabi	
7144	Barbara Fite	
7145	DAWUD MUHAMMAD	
7146	Robert Mizar	
7147	Dennis Lengel	
7148	Melissa Glick	
7149	Debra Willey	

Submission ID	Name	Organization Name
7150	Miriam Blachman	
7151	Robin Cook	
7152	Greg Brown	
7153	Richard Stern	
7154	Paul Lapidus	
7155	Nan Smith	
7156	Chris Hays	
7157	Douglas Estes	
7158	Julia Bottom	
7159	Simeon Dreyfuss	
7160	Elisabeth N.	
7161	Karen Staudt	
7162	cave man	
7163	Elizabeth Lutz	
7164	Michael Rouse	
7165	Vincent Kotnik	
7166	Sherry Jagerson	
7167	Dallas Windham	
7168	Beverly Nodzak	
7169	Elaine Linet	
7170	Nancy Bukowski	
7171	Jill Madsen	
7172	Susan Bradshaw	
7173	Pamela Zimmerman	
7174	Mary Seiler	
7175	Mickey McCarthy	
7176	Robert Davis	
7177	Mari Daugherty	
7178	Kathleen Roediger	
7179	Stephen Wyman	
7180	Kenneth Lapointe	
7181	Jana Kitzinger	
7182	Lara Levison	
7183	Linda Erickson	
7184	Sue Parker	
7185	Lora Tenenbaum	
7186	J. Hays	
7187	Colleen Cleary	
7188	Dennis Lockwood	
7189	Robert Lang	
7190	Matthew Ford	
7191	Janet Lowell	
7192	Laura Huddlestone	
7193	Cathy Felix	
7194	Kathryn Forney	
7195	Claire Chambers	
7196	Maureen Carson	
7197	David Philleo	
7198	Yolan Mistele	
7199	Andrea Eisenberg	
7200	Michael Coe	
7201	Carolyn Marx	
7202	John DuBois	
7203	doug krause	

Submission ID	Name	Organization Name
7204	Margery hamlen	
7205	Jean Clark	
7206	Joan Smith	
7207	Jean Wedekind	
7208	Nancy Robinson	
7209	Jorge Espinoza	
7210	Shirley Pharis	
7211	Elizabeth Bryson	
7212	Frank Letton	
7213	Sean Hlavac	
7214	Shirley Espeland	
7215	Norman Herron	
7216	Cindy Stein	
7217	David Carey-Kearney	
7218	Robert Blankenship	
7219	Sharon Rich	
7220	Richard Taliaferro	
7221	Christine Sandow	
7222	Erik Hvoslef	
7223	Barbara Collins	
7224	Chris Heinz	
7225	Jeff Reynolds	
7226	Herbert Elwell	
7227	Raechel Pietraszak	
7228	Susan McGaughey	
7229	John Piper	
7230	Dawn Ehli	
7231	N H	
7232	Stephen Nelson	
7233	Jim Anderson	
7234	Steven Savitsky	
7235	annie houston	
7236	Phyllis Blumberg	
7237	Melanie Gibson	
7238	Stuart Clark	
7239	Douglas Waggoner	
7240	Dave Mills	
7241	Robert Schulz	
7242	Inger Acking	
7243	Thomas Greenough	
7244	Patricia Warming	
7245	Veronica Romero	
7246	Robert Inglis	
7247	Rodrigo Dominguez	
7248	Kitty Savage	
7249	Nancy White	
7250	John Roche	
7251	Holly Altenderfer	
7252	Julia McMahon	
7253	Larry Bonura	
7254	Neil Blanchard	
7255	David Hamel	
7256	Paul Packer	
7257	Gregory Porter	

Submission ID	Name	Organization Name
7258	Joann Koch	
7259	Reuben Wade	
7260	John Swift	
7261	John Laing	
7262	Samantha Nathan	
7263	Ben Martin	
7264	Helena Saarion	
7265	Jackie Ramirez	
7266	Janet Kennington	
7267	Pat piggee Piggee	
7268	Alan Lorenzen	
7269	Sara Bonnette	
7270	Susan McClure	
7271	Denise Jennings	
7272	Mark Blandford	
7273	Bruce Burns	
7274	Christian Roop	
7275	Peter Lenshoek	
7276	Ronald Dupard	
7277	Robert Check	
7278	Stephanie Trasoff	
7279	Christopher Harris	
7280	Linda Kollman	
7281	Bob Jorgensen	
7282	Patrick TenHoopen	
7283	Harold Watson	
7284	Janet Harmon	
7285	Freya Hite	
7286	Steven Lowenthal	
7287	Debra Degalis	
7288	Janet Nongbri	
7289	George Fisher	
7290	Larry Hegberg	
7291	Donna J Curry	
7292	Nathaniel Hammerli	
7293	Colin Cortes	
7294	Tom Gauntt	
7295	Susan Kollar	
7296	Kenneth Kast	
7297	Elizabeth Olson	
7298	Katie Petersen	
7299	Ferrell Stein	
7300	Tita Husted	
7301	David G. Laramie	
7302	Joe Glaston	
7303	Hank Patton	
7304	KURT CRUGER	
7305	Brian Gingras	
7306	Susan Eckstein	
7307	James Gray	
7308	Andrew Kistler	
7309	Thomas Edmonds	
7310	Linda Youngs	
7311	Virginia Johnston	

Submission ID	Name	Organization Name
7312	Stephan Donovan	
7313	Jean Kim	
7314	Kevin Vaught	
7315	Tom Csuhta	
7316	Tina Rogers	
7317	Shirley Rice	
7318	Lillian Kocher	
7319	RM Krebs	
7320	Merle Molofsky	
7321	Kathryn Hudson	
7322	Marilee Murray	
7323	Nathaniel Ramos	
7324	Nikki Adams	
7325	Matthew Thompson	
7326	Judy Wang	
7327	Monica McKeown Gallicho	
7328	Sarah Newman	
7329	Kathy Mason	
7330	Sofia Moya	
7331	Jarrett Cloud	
7332	Karl Hildenbrand	
7333	Edward Schneider	
7334	Andrew Thompson	
7335	Maria Cameron	
7336	Leda Contis	
7337	Dawn Pesicka	
7338	Nancy Carl	
7339	Edwin Martz	
7340	Henry B. Mitchell III	
7341	Margaret Kahovec	
7342	Melvin Armolt	
7343	Jon Kiesling	
7344	Juli Van Brown	
7345	Stephen Luongo	
7346	Gerald Gebhart	
7347	Elizabeth Kiernan	
7348	Sharon Nicodemus	
7349	Lester Belanger	
7350	Holly Hanson	
7351	Jeffrey Bains	
7352	Stan Janzick	
7353	Debra Grund	
7354	Katrina Shortridge	
7355	David Quiggle	
7356	Greg Cavanagh	
7357	Emily Castner	
7358	Charles Fletcher	
7359	John Palenik	
7360	Pamylle Greinke	
7361	Johnny Hall	
7362	Karen Rusen	
7363	Nicholas Pierotti	
7364	Janice Dlugosz	
7365	Madison Hoover	

Submission ID	Name	Organization Name
7366	Maureen Sheahan	
7367	Rita Sack	
7368	M. R	
7369	Kimberly Walker	
7370	George Scott	
7371	Samuel Pearson	
7372	Gary Nelson	
7373	Marcia Close	
7374	Andrew Zugay	
7375	Gary Milgrom	
7376	Sharon McKeiver	
7377	Gail Wilke	
7378	Dawn Dowdy	
7379	John Kovencz	
7380	Alexis LaBarge	
7381	Ken Cohn	
7382	Dina Lassow	
7383	J.L. Evans	
7384	dogan ozkan	
7385	George Gordon	
7386	Susanne Taub	
7387	Caroline Bowdish	
7388	Todd Clark	
7389	Elaine Barrett	
7390	Yausen Hyldahl	
7391	Barbara Beck	
7392	Ron Johnson	
7393	Jesse Croxton	
7394	Jason Steadmon	
7395	Natalie Van Leekwijck	
7396	Antoinette Meale	
7397	Corinne Greenberg	
7398	christy knox	
7399	Jana Bassman	
7400	Donald Onsgard	
7401	Rosa Valentin	
7402	Elizabeth Ishmael	
7403	Lanna Ultican	
7404	Daniel Bower	
7405	Glenn Kraus	
7406	Glenn Barclift	
7407	April doyle	
7408	Georgia Labey	
7409	Sarah Staats	
7410	Javier Aguilar	
7411	W Liepmann	
7412	Erin Schwaller	
7413	Wayne Kessler	
7414	Terrance McIntosh	
7415	Richard Guevara	
7416	Craig Swanson	
7417	Lucy Conger	
7418	Andrea DePaola	
7419	Chrystal Schivell	

Submission ID	Name	Organization Name
7420	Jim Mackey	
7421	Nancy K Godwin	
7422	Melinda Armistead	
7423	Paul Swain	
7424	Laura Raffield	
7425	Cheryl Mueller	
7426	Mary Drake	
7427	Karen Wagner	
7428	Henri Laborde	
7429	Barbara Barry	
7430	Eric Bergman	
7431	Bernita B Smith	
7432	Anna MacKenzie	
7433	Judith Uebelacker	
7434	MaryRose Randall	
7435	John Laing	
7436	Dan Recio	
7437	Noah Hanmer	
7438	John Kolstoe	
7439	Mel Reader	
7440	Liz Johnson	
7441	Raymond McGrath	
7442	Jennifer Cunningham	
7443	Lynn Godmilow	
7444	Jean Langford	
7445	Dan Cush	
7446	Mark Jennerjohn	
7447	Joe Kiefner	
7448	John Wienert	
7449	William Welkowitz	
7450	Julie Kanoff	
7451	Marilyn Hinds	
7452	Carole Ann Cole	
7453	Pat Dosky	
7454	Nancy Marshall	
7455	Lydia Saderman	
7456	Bobbie Flowers	
7457	Tracy Rogers	
7458	Brandon Whitesell	
7459	Janet Hirschhorn	
7460	Ian Van Wert	
7461	Jonathan Rittenhouse	
7462	Paulette Doulatshahi	
7463	Jennifer Schally	
7464	Golda Michelson	
7465	Ryan Chaglasian	
7466	Melinda Morton-Illingworth	
7467	Denise Fogel	
7468	Eva Goss	
7469	Tamra Nelson	
7470	Lee Hutchings	
7471	ken bosch	
7472	David Watters	
7473	Paul Nehring	

Submission ID	Name	Organization Name
7474	Lorraine Martinez	
7475	Patrick Malone	
7476	katherine kohrman	
7477	Charles Trimbach	
7478	Phoebe Rufener	
7479	Mary Duffy	
7480	Don Simmons	
7481	Karen F	
7482	Cathy Barton	
7483	Bob Mincberg	
7484	Margarita Perez	
7485	Lynne Coward	
7486	Inez Abeyta	
7487	Kermit Cuff	
7488	Daniel Laemmerhirt Laemmerhirt	
7489	William Calhoon	
7490	Elaine Benjamin	
7491	Helen Lozoraitis	
7492	Marybelle Sucek	
7493	John Barkhausen	
7494	Danielle Curley	
7495	Kenneth Ridley	
7496	Janelle Bowen	
7497	Duncan Peterson	
7498	Ron Jyring	
7499	Dusty Cordell	
7500	Lorraine Akiba	
7501	Anne Reich	
7502	steven carpenter	
7503	Joseph Appell	
7504	Paul Doelling	
7505	John Spencer	
7506	Carl Oerke	
7507	janice duffney seipel	
7508	Dolores Fifer	
7509	Constance Otto	
7510	Karen Waldear	
7511	Jeffrey Marque	
7512	Douglas VanScoik	
7513	Mark Hodgson	
7514	Carolyn Riday	
7515	Anne Dugaw	
7516	Barbara Heinzen	
7517	Nancy Desecki	
7518	Mark Duffy	
7519	Sara Smith	
7520	Robert Haslag	
7521	Lawrence Crowley	
7522	Nancy Linder	
7523	S Z	
7524	Michael Ross	
7525	Randy Will	
7526	Linda Rudolph	
7527	Gina Campbell	

Submission ID	Name	Organization Name
7528	Kelli Reid	
7529	Wes Weaver	
7530	Robert Thomas	
7531	David Bernal	
7532	Elizabeth MacKelvie	
7533	Mark Wilson	
7534	Steven Levin	
7535	Donna Noyes	
7536	Christopher Hathaway	
7537	Mary Mellon	
7538	Sumner Roper	
7539	Glenn DeLuca	
7540	Ljubica Sefer-Stefancic	
7541	Roman Fruth	
7542	Craig Warren	
7543	Lawrence Bojarski	
7544	Eva Marks-Curatolo	
7545	Karen Vergara	
7546	Jody Leete	
7547	Rose Greco	
7548	Robert Burrows	
7549	Beth Herndobler	
7550	Susan Williard	
7551	Michael Robles	
7552	Garry Weisman	
7553	Helen Balgooyen	
7554	Rebecca Tippens	
7555	Linda Gertig	
7556	Anne Clune	
7557	Thomas Mader	
7558	Germaine Gogel	
7559	Dana Dodge	
7560	Meredith Smith	
7561	Jose Perez	
7562	MICHAEL HUBBARD	
7563	Michael Klausing	
7564	Jon Anderholm	
7565	Randall Foreman	
7566	Richard Lombard	
7567	Laura Delmas	
7568	Brett O'Sullivan	
7569	Terrence Thompson	
7570	Lisa Leblanc	
7571	Maria Whelan	
7572	K.L. Eckhardt	
7573	G Derner	
7574	Barbara King	
7575	Ellie Eich	
7576	Joe Rogers	
7577	Suzanne Barns	
7578	Kim Stewart	
7579	Annette Dake	
7580	Deborah L Steinmetz	
7581	Myrna Britton	

Submission ID	Name	Organization Name
7582	Kathleen Field	
7583	Robert Winkler	
7584	Sally Noack	
7585	Sharon Carder-Jackson	
7586	Thinh Ngo	
7587	Erin Conklin	
7588	Marvin Cling	
7589	Lin Simpson	
7590	Keith Helmkamp	
7591	Claire Flewitt	
7592	Susan Druckman	
7593	Keith Ohler	
7594	Peter Corrigan	
7595	Rondi Saslow	
7596	Henry Velick	
7597	Cyndi Hunt	
7598	Wendy Emlinger	
7599	James Brown	
7600	Katherine Barrett Z	
7601	Jenna Fallaw	
7602	Kevin Slauson	
7603	Nora Eiesland	
7604	Nora Eiesland	
7605	Steve Tardif	
7606	Kristen Swanson	
7607	Thomas Desellier	
7608	Gary Coller	
7609	Kurt Langberg	
7610	Jeff Alper	
7611	Jennifer Grace	
7612	Christine Angerer	
7613	Adam Paul	
7614	Kate Bernardo	
7615	Laura Goldberg	
7616	Ronald Partridge	
7617	bruce tucker	
7618	Deedee Tostanoski	
7619	suzanne gaspar	
7620	Sharon Werner	
7621	FRANCES FRAINAGUIRRE	
7622	Christine Napolitan	
7623	Ron Schutte	
7624	Nancy Johnson	
7625	Nina Dabek	
7626	Dave Karrmann	
7627	Alan Montemayor	
7628	M Riswadkar	
7629	Joyce Black	
7630	Judith Mercer	
7631	Joel Hariton	
7632	Debra Marge	
7633	Mark Canright	
7634	F Marion Mitchell III	
7635	Margaret Schnipper	

Submission ID	Name	Organization Name
7636	Maria Smith	
7637	Robert Ogden	
7638	Cheryl Alexander	
7639	Veronica Lichman	
7640	Mary Pendergrast	
7641	Sharon Hawkinson	
7642	Edith Root	
7643	ANNE Lewis	
7644	Jonathan Rhine	
7645	Anne Van Alstyne	
7646	Roger Messenger	
7647	Kent Mazique	
7648	Sean Mooney	
7649	Carol Lee	
7650	fay forman	
7651	Dennis McGee	
7652	Paul Netusil	
7653	Todd Johnston	
7654	Eric Crouch	
7655	Richard Metcalf	
7656	Bonnie Davis	
7657	Kristina Knight	
7658	baruch weisman	
7659	Carol Lake	
7660	Anne Deysher	
7661	Chris Casper	
7662	Kate Robinson	
7663	Antonio Valdez	
7664	Kate Robinson	
7665	Enid Christine Armenta	
7666	R Dean James	
7667	Brenda Ransom	
7668	Rho Levin	
7669	Russell Fletcher	
7670	Teri Koslen	
7671	Kathleen Doyle	
7672	Ken Canty	
7673	Deirdre L. Smeltzer	
7674	Jennifer Nitz	
7675	Karen Maleski	
7676	Sarah Hurd	
7677	Robert Gibb	
7678	Chris Jones	
7679	Michael Meyers-Jouan	
7680	Charles Reese	
7681	Nancy Jarvis	
7682	Lisa Deville	
7683	Ardis Letey	
7684	Linda Larkin	
7685	Rebecca Scheckler	
7686	Timothy Kosem	
7687	Ilana Schoenfeld	
7688	William Telfair	
7689	Lisa Shanks	

Submission ID	Name	Organization Name
7690	Kristina Lozon	
7691	Vicki Smith	
7692	Tyra Pellerin	
7693	Dan Larson	
7694	John Blumberg	
7695	Alana Willroth	
7696	Samantha Goldman	
7697	Georgia Locker	
7698	Joyce Ellwanger	
7699	Robin Poritzky	
7700	Phyllis Corcacas	
7701	Linda Fighera	
7702	Richard Carr	
7703	Margaret Lynch	
7704	Barbara MacDougall	
7705	Roderic Stephens	
7706	David Doll	
7707	Annette Frisbie	
7708	Michael Peterman	
7709	Linda Wunderlich	
7710	Katarine Quintana	
7711	Marge Ferrance	
7712	Elyse Gay	
7713	Lisa Brehm	
7714	John Nickey	
7715	Timothy Stoesz	
7716	Dayle Schweninger	
7717	steven g rosin	
7718	Chad Armknecht	
7719	Edward Hills	
7720	Margi Mulligan	
7721	Donna Mummery	
7722	Michael Spacek	
7723	Laura Kramer	
7724	Jaye Anna Mundy	
7725	Andrea Bean	
7726	Timothy O'Neil	
7727	John Nickey	
7728	Kathleen Morrow	
7729	John Keiser	
7730	Keith Wilkins	
7731	Ernie Walters	
7732	Pan Welland	
7733	Anne Bucher	
7734	Mary Jeffrey	
7735	Lisa Howell	
7736	ursula kremer	
7737	Mary Eldredge	
7738	Dorothy Knudson	
7739	Eleanor Dubois	
7740	Jennifer Grasso	
7741	Michael Elkins	
7742	Samuel Durkin	
7743	Kayla McKee-Price	

Submission ID	Name	Organization Name
7744	Robert Koopmans	
7745	Rick Herman	
7746	Marie Whidden	
7747	Hooman Larimi	
7748	Victoria Shankling	
7749	Marty Manson	
7750	Juan Canet	
7751	Marjorie Smith	
7752	Ken Novak	
7753	Linda McVarish	
7754	Paul Dougherty	
7755	Bruce Stotler	
7756	Deb Stiger	
7757	Chris Smith	
7758	Eileen Hunter	
7759	A Patterson	
7760	Steven Sy	
7761	paul st. amour	
7762	Jeff Howe	
7763	James Weinmann	
7764	rita racioppo	
7765	Misha Fredericks	
7766	Cindy Harris	
7767	Tina Brown	
7768	Gregory Tabat	
7769	Jeanette King	
7770	Chuck Untulis	
7771	Jenny Kastner	
7772	Bernie Zelazny	
7773	Elizabeth Hart	
7774	Marvin Wingfield	
7775	Richard Takagi	
7776	Carolyn Bishop	
7777	Jill Sablosky	
7778	Pamela Gendlek	
7779	dorothy Callison	
7780	Kathy Kerridge	
7781	Dudley Mann	
7782	Stephanie Meacham	
7783	Sandra Klueger	
7784	Jon Singleton	
7785	Russell Thayer	
7786	Gary Lynch	
7787	Jan Chepeska	
7788	Dipali N	
7789	Sara Townsend	
7790	Michael Kenosky	
7791	Lawrence Blood	
7792	Elizabeth And Wayne Paulson And Mayer	
7793	Sacha de Nijs	
7794	Jamie Morris	
7795	John Hess	
7796	Lynne Glaeske	

Submission ID	Name	Organization Name
7797	Linda Murphy	
7798	Eugene Marangoni	
7799	Andrea Taylor	
7800	Janice Rost Rost	
7801	Janet Heinle	
7802	Janet Ciegler	
7803	Arthur Steuer	
7804	Christine Berger	
7805	Michael Hegemeyer	
7806	Richard Knochel	
7807	David Parrett	
7808	Kathy Gainard	
7809	Scott Beyer	
7810	John Ulmer	
7811	Glen Anderson	
7812	Leslie Bullo	
7813	Rolf Schulte	
7814	Margaret Earl	
7815	Michael White	
7816	James Moore	
7817	Steven Vogel	
7818	Karen Morrow	
7819	Nancy Woolley	
7820	Mark Anthony	
7821	Anne Drinkwater	
7822	Howard Houseknecht	
7823	Terri Reischl	
7824	Daniel Pritchett	
7825	Daniel Kozminski	
7826	Leigh Emerson Smith	
7827	arnold talentino	
7828	Jacqueline Stewart	
7829	Teresa Pitts	
7830	Dayle Severns	
7831	Naomi Klass	
7832	James Huffman	
7833	Michael F. Kolassa	
7834	Mac Bridgett	
7835	Tina McNew	
7836	William Parr	
7837	Kari Lorraine Scott	
7838	LaDonna Burton	
7839	Judith Braffman-Miller	
7840	Veena Singwi	
7841	Drena LaPointe	
7842	Earl Shimaoka	
7843	Stacey Chen	
7844	Dave McKee	
7845	Patricia Williams	
7846	Donna Chatel	
7847	K R	
7848	Karen Bell	
7849	Aileen Grant	
7850	Claude Beavers	

Submission ID	Name	Organization Name
7851	Claudia Halsell	
7852	Bill Vartnaw	
7853	Blake Stoll	
7854	George Dragity	
7855	Barbara Brown	
7856	Bruce Moyer	
7857	John Carrera	
7858	Eliot Brown	
7859	Donald Brownson	
7860	Dave Frank	
7861	Patricia Grogan	
7862	Nancy Pellatt	
7863	Lisa Sadleir-Hart	
7864	Luke Metzger	
7865	Suzy Siegmann	
7866	Andrea Cain	
7867	June Fait	
7868	Meryle A. Korn	
7869	Nora Privitera	
7870	Dave Karrmann	
7871	Tony Piselli	
7872	PAUL KUCHYNSKAS	
7873	Lynne Teplin	
7874	Roberta Kessler	
7875	Doris Briggs	
7876	Scott Baker	
7877	Corine Lindhorst	
7878	Donna Williams	
7879	Sheri Ambrose	
7880	Shelley Wehberg	
7881	Laurie Puca	
7882	Margot Lenhart	
7883	Stephen Bartlett-R	
7884	scott Finamore	
7885	Stan Houseman	
7886	Joseph Suarez	
7887	Kevin Walsh	
7888	Chuck Graver	
7889	Den Mark Wichar	
7890	Chip Fontaine	
7891	Nicole Tursi	
7892	Vincent Castellano	
7893	Steven Biggio	
7894	Kaylene Schultz	
7895	Cindy Porter	
7896	Sherrill Gary	
7897	David Peterson	
7898	Sandy Cashman	
7899	Linda Bridges	
7900	Nick Gaetano	
7901	Dora Vivaz	
7902	Charles Johnson	
7903	Karen Donaldson	
7904	Delmar Williams	

Submission ID	Name	Organization Name
7905	Joanne Kellar	
7906	Pilar Millhollen	
7907	Christopher Wells	
7908	Rachel Paull	
7909	Kenneth Chay	
7910	Toby Shulruff	
7911	Brianna Hoover	
7912	x o	
7913	Suzanne Challinor	
7914	Anastasia Hanifan	
7915	Judith Eda	
7916	Morgan Clark	
7917	David Friedman	
7918	Berte Rosin	
7919	Victoria Copley	
7920	stefan cook	
7921	Marsha Balian	
7922	Michele Reed	
7923	Bernard Lefson	
7924	joe karr	
7925	James Stagnitta	
7926	Katie Robert	
7927	Heather Servais	
7928	Patricia Phillips	
7929	James Van Dinter	
7930	Stephen Pazdziorko	
7931	Charleen Ounsworth	
7932	Jennifer Baker	
7933	Ben Conley	
7934	Edie Bruce	
7935	Beverly Hoff	
7936	Andrea Chisari	
7937	Carolyn Rhazi	
7938	melissa spengler	
7939	Steven Collins	
7940	Michael Sileno	
7941	Barbvm E	
7942	Patricia Urban	
7943	Richard Heyman	
7944	Kay Clement	
7945	Jessica Heiden	
7946	Helen Bell	
7947	Paul Echternacht	
7948	Caren Flashner	
7949	Terry Hasan	
7950	Ryan Acheson	
7951	Linda Morgan	
7952	Maryellen Alviti	
7953	Robert Stark	
7954	Angela Ortiz	
7955	Robert Branson	
7956	Dorian Charles	
7957	Vikram Sikand	
7958	Pamela Montgomery	

Submission ID	Name	Organization Name
7959	Mauria Sazonov-Robinson	
7960	Joseph H Evans Sr	
7961	Marco Pardi	
7962	Geoffrey And Linda Symcox	
7963	Geoffrey And Linda Symcox	
7964	Timothy Larkin	
7965	MarieElaina Rago	
7966	Frances Blythe	
7967	sun hae kim	
7968	Sadu Nanjundiah	
7969	Benjamin Hart	
7970	W. G.	
7971	IRENE LOPEZ	
7972	Julien Perrette	
7973	J.Isabelle Dyck	
7974	Robyn Strauss	
7975	Nora Jaffe	
7976	John Klima	
7977	James Hoover	
7978	C.Jean Boomershine	
7979	Bill Hilton	
7980	Barbara Garber	
7981	Debra Wile	
7982	Lynne Landers	
7983	Robert Nolter	
7984	Henry Billinghamurst	
7985	Merrie Thornburg	
7986	Jennifer Corrigan	
7987	Matt Bolles	
7988	Phill Patzer	
7989	Charlie Burns	
7990	Melvin Rosenthal	
7991	Kathie Takush	
7992	Lawrence Laslett	
7993	Max Rissman	
7994	Daniel Willner	
7995	Lawrence Gales	
7996	Jeff Burns	
7997	Bob and Genie McCombs	
7998	Deborah Peri	
7999	Gail Madison	
8000	Connie Dunn	
8001	Mark Hollinrake	
8002	Douglas Engle	
8003	Jim Kessler	
8004	Pamela Pinkston	
8005	Amelia McCarthy	
8006	Marilee Corey	
8007	Mary Downey	
8008	James Bumgarner	
8009	Maureen Burke	
8010	Rep. Seth Armstrong	
8011	Lana Schmitt	
8012	Lana Schmitt	

Submission ID	Name	Organization Name
8013	Lana Schmitt	
8014	Ron Price	
8015	Doris Shultz	
8016	Al Wrik	
8017	Derek Andersen	
8018	Carmella Campione	
8019	Grace Lin	
8020	Rodney Saenz	
8021	Ann Sparks	
8022	Mark White White	
8023	Lily Bushman-Copp	
8024	Andrew Colletto	
8025	John Wadsworth	
8026	Matt Baas	
8027	Kathleen Lee	
8028	Rick Edmondson	
8029	Beth Jane Freeman	
8030	Lynne Koenigsberg	
8031	Michael Tomczyszyn	
8032	Sandra Naidich	
8033	Cynthia Johnson	
8034	Linda Abbott	
8035	Beth Jane Freeman	
8036	Ursula Cohrs	
8037	Elsa Petersen	
8038	Robert Keller	
8039	Jahanzeb Chaudhry	
8040	Gregory Robinson	
8041	Chris Wimberg	
8042	David Kramer	
8043	Anthony Severo	
8044	Karen Bain	
8045	robert Worms	
8046	Marcia Kolb	
8047	Debra nichols	
8048	Carolyn Villanova	
8049	Christopher Dowling	
8050	Jim Nourse	
8051	Timothy Kautza	
8052	ROBIN SINER	
8053	Bonnie and Andrew Tangelos	
8054	Gerry Giunta	
8055	Carole Campbell	
8056	Sharon Smith	
8057	Susan Dickerson	
8058	John Kirchner	
8059	Dennis Oliver	
8060	Mark Smyth	
8061	Judith DiBiase Bennis	
8062	Tracy Marks	
8063	Theodore and Marjori Henning	
8064	Jean Kozel	
8065	Pat Button	
8066	Lynn Ricci	

Submission ID	Name	Organization Name
8067	Sandy Amberg	
8068	Katherine Holmes	
8069	Melissa Rees	
8070	therese furois	
8071	Larry Lewis	
8072	Kevin Heaslip	
8073	Robert Veltkamp	
8074	C. Kasey	
8075	Susan Benton	
8076	Diane Gioe	
8077	Anna Schofield	
8078	Gary Stotler	
8079	Skye Williamson	
8080	Janet Rutledge	
8081	Ann Greci	
8082	Wayne Anderson	
8083	Robert Earl	
8084	Carole Miller	
8085	Sid Reischer	
8086	Francine Lane	
8087	Amy Douglass	
8088	Christopher Tumolo	
8089	Wim Vand	
8090	Gail Tanner	
8091	Sharon Peariso	
8092	Marianne Clemente	
8093	Leone Olson	
8094	Kelly Eliason	
8095	Darryl Buck	
8096	Phillip J Crabill	
8097	Kelly Allison	
8098	Patricia Levan	
8099	Jane Church	
8100	Marie-Elise Zovko	
8101	Louis Discepola	
8102	Steven Roberson	
8103	Steve Prince	
8104	Michael Lindner	
8105	Gail Yborra	
8106	Brian Kirk	
8107	Carolyn Pagliuca	
8108	Julie Gengo	
8109	Robert Fried	
8110	Craig Keith	
8111	Alice Marie	
8112	Jim Weaver	
8113	Ryan Hanson	
8114	Jamie Shultz	
8115	James Kovac	
8116	Sharon Rose	
8117	Frances Hazam	
8118	Chris Aldrich	
8119	Bill McSteen	
8120	Larry Welsh	

Submission ID	Name	Organization Name
8121	Stephanie Kana	
8122	Elizabeth Agren	
8123	Sylvia Cardella	
8124	Elizabeth Agren	
8125	Kim Secunda	
8126	H Clarke Gentry	
8127	Ian Kruger	
8128	Joanne Ishisaka	
8129	Sara Roderer	
8130	Nicholas Floyd	
8131	Tina Zenko	
8132	Cam Quevedo	
8133	Neville Bruce	
8134	Michael Kavanaugh	
8135	Tammy Rohatynski	
8136	Staci Tefertiller	
8137	Mary Combs	
8138	Randall Butler	
8139	Richard Rubinstein	
8140	Bobbie Hensley	
8141	John Mitchel	
8142	Alexandra Coates	
8143	Bernadette Belcastro	
8144	Franklin I. Hughes	
8145	Christina Criss	
8146	Pete Wilson	
8147	Jennifer Block	
8148	anthony Montapert	
8149	Joan Langue	
8150	David Beauvais	
8151	Victoria Behar	
8152	Ellen Levy	
8153	Joel Friedman	
8154	Lindsay Moore	
8155	Alan Nogee	
8156	Glenn Haselfeld	
8157	Robert Lawrence	
8158	Chris Lee	
8159	David and Justine Ross	
8160	Paul Katz	
8161	Zsuzsa Palotas	
8162	Debra Hoven	
8163	Terry Flowers	
8164	Mike Bonar	
8165	Saundra Petrella	
8166	Sharon Rothe	
8167	Beth Vollmar	
8168	Doris Marie Thrasher	
8169	Mary Guard	
8170	Chad Elliott	
8171	Diane Ryerson	
8172	Nicholas Seaman	
8173	Martha Masura	
8174	Steven Goes	

Submission ID	Name	Organization Name
8175	Bron Lucas	
8176	Moses Carl	
8177	Jared Laiti	
8178	Jan Kent	
8179	David Copper	
8180	Dan Johnson	
8181	Lance Kammerud	
8182	Marty Fox	
8183	Tim Murphy	
8184	Kellen Dunn	
8185	M. Charlotte Barton	
8186	Gary Rainville	
8187	Lisa James	
8188	Jeremy Bohlin	
8189	Bryan Anthony	
8190	David Hudzinski	
8191	Rhonda Keller	
8192	Eric Michelsen	
8193	George Simon	
8194	Raymond Zahra	
8195	Mohammad Saffouri	
8196	Philip Drumm	
8197	Genevieve Herrick	
8198	Elizabeth Bussard	
8199	Faith Franck	
8200	Brandie Deal	
8201	Jan Klein	
8202	Emily Caldwell	
8203	Deborah Sellers	
8204	jane Biggins	
8205	Paul Banner	
8206	Carol Anderson	
8207	Clinton Roche	
8208	Wilma Hackman	
8209	Mary Klicka	
8210	L Ulrich	
8211	Susan Green	
8212	Erin McRaith	
8213	Carole Scott	
8214	Linda Schubert	
8215	Olga Aguayo	
8216	Kenneth L	
8217	Gary Overby	
8218	Brian Yanke	
8219	Jacqueline Fox	
8220	James Hanon	
8221	Dr. Sharon Kosek	
8222	Lynn Artz	
8223	Stacy Lesartre	
8224	Patricia Rolston	
8225	Sylvia Stack	
8226	Susan Eaton	
8227	Margaret Dean	
8228	William Klock	

Submission ID	Name	Organization Name
8229	James Hochstetler	
8230	Erik Shank	
8231	William Marsh	
8232	Cori Bishop	
8233	John Wright	
8234	Steve Aydelott	
8235	Edith Jacobsen	
8236	Mary Georgiton	
8237	John Adam	
8238	Ruth Petzold	
8239	Richard Keeler Keeler	
8240	Cheri Haram	
8241	Sister Honora Kinney	
8242	Ken Pearson	
8243	BRUCE OSHABEN	
8244	Barbara Cicalese	
8245	Richard Engelmann	
8246	Brenda James	
8247	Stephen Bohac	
8248	A N	
8249	Dave Kraus	
8250	Jennifer Kovencz	
8251	Terri Resley	
8252	Pat Hughes	
8253	Shawn Alexander	
8254	Albert Gamble	
8255	M Port	
8256	Margaret Gryska	
8257	Francoise La Monica	
8258	Kathryn Melton	
8259	Paul Bredderman	
8260	Douglas Meacham	
8261	Linda Myrick	
8262	Janet Dietz	
8263	Tom Kilminster	
8264	Julian Corley	
8265	David Fleming	
8266	Jim Piascik	
8267	Cody Goin	
8268	William Christwitz	
8269	Nikhil Shimpi	
8270	Sharon Callahan	
8271	Lou McMillion	
8272	Lois Jordan	
8273	Steve Wurtz	
8274	R B	
8275	Thomas Artle	
8276	Don Fisher	
8277	Steve Neubeck	
8278	KIRKE MCVAY	
8279	Michael and Libby Robold	
8280	Ruth Bauer	
8281	Blaise Brockman	
8282	Helen Martin	

Submission ID	Name	Organization Name
8283	Teresa Brewster	
8284	Ira Kaplan Kaplan	
8285	Claudette Midgley	
8286	Vickey Baker	
8287	Melanie Sinclair	
8288	Karla Devine	
8289	Jacqueline Winther	
8290	Debra Smith	
8291	Roger Lambert	
8292	Scott Toland	
8293	Nancy Mulvany	
8294	Patricia Foley	
8295	Liz Murphy	
8296	Lola Simons	
8297	Paul Lifton	
8298	Susan Hindman	
8299	David and Shirley Hegdahl	
8300	Marjorie Stein	
8301	Tim Moran	
8302	Alice Polesky	
8303	Darlene Jakusz	
8304	Mary Fischer	
8305	Martha Ellison	
8306	RICHARD TANNER	
8307	Laura Esparza	
8308	Patricia Burton	
8309	Rob Myers	
8310	Luis Prado	
8311	Christina Hewitt	
8312	Mary Ellen Mellon	
8313	bill Richards	
8314	Pat Hyde	
8315	Jeanne Musgrove	
8316	Luke Magnotto	
8317	Dorothy Hammer	
8318	harriet barrow	
8319	Klara Scott	
8320	Greg Reynolds	
8321	Howard Crocker	
8322	Dana Jansen	
8323	Edward Smith	
8324	Richard Wheland	
8325	Lydia Garvey	
8326	Karen Cotterell	
8327	Jack Miller	
8328	Roy Snell	
8329	Michele Barnes	
8330	Sammy Low	
8331	Marion Lakatos	
8332	Harvey Turer	
8333	Nicholas De Santos	
8334	Ann Grant	
8335	Harriet Levine	
8336	Hayley Schwitz	

Submission ID	Name	Organization Name
8337	Jim Briggs	
8338	Joel Clasemann	
8339	Thomas Hawkins	
8340	James Heller	
8341	Don Hawkins	
8342	Judy Nakadegawa	
8343	Carol King	
8344	Roger Oborn	
8345	Richard Lees	
8346	Jane Mayes	
8347	William Cline	
8348	Mary Kotsopulos	
8349	Lauren Chavez	
8350	GREG SAUCI	
8351	Linda Burt	
8352	Nora Holmes	
8353	Melissa Hutchinson	
8354	Douglas Throp	
8355	Michael Swan	
8356	Hilary Emberton	
8357	Gina Putt	
8358	john anderson	
8359	Edith Wolff	
8360	Maryan Infield	
8361	Thomas Smith	
8362	Enrico Aquino	
8363	Annie McMahon	
8364	J Lasahn	
8365	Rick Ress	
8366	Jess Turner	
8367	Patricia Rahikainen	
8368	Fred Longhart	
8369	Lindy Von Dohlen	
8370	Milton and Shirley Nelson	
8371	Rik Farrow	
8372	Sandra Lane	
8373	Joan Paul And Pj Sullivan	
8374	Joan Rodberg	
8375	Marjorie Deane	
8376	Dwight Tjornhom	
8377	Steven Schlam	
8378	John Glenn	
8379	Brian Kaiser	
8380	Karen Freeman	
8381	Tim Durnell	
8382	Glory Adams	
8383	Patricia Emmert	
8384	Craig Cook	
8385	Ann Kornbluth	
8386	Louis Biely	
8387	Eliot Gillum	
8388	Albert Sanchez	
8389	Lynn Merle	
8390	Heather Marsh	

Submission ID	Name	Organization Name
8391	Lynne Kagan	
8392	Nancy Hartman	
8393	Victoria Shorr	
8394	Rassoul Faqueri	
8395	Maureen O'Neal	
8396	Keith Roberts	
8397	Tamara Larned	
8398	suzanne kuffler	
8399	Joe Bailey	
8400	Frederick White	
8401	Kenneth W Johnson	
8402	Garry Kramchak	
8403	Don Powers	
8404	Joe Tonini	
8405	Cathern Smith	
8406	Teri Slagle	
8407	James Falsken	
8408	Moira Williams	
8409	Mary Loomba	
8410	Gary Mazzotti	
8411	Matthew Martin	
8412	Martha Stevens	
8413	Kenneth Gamauf	
8414	Duncan Baruch	
8415	Otto Wildensteiner	
8416	Samantha Orszulak	
8417	Eloise Hill	
8418	John Vanellis	
8419	Ellen McCann	
8420	Curtis Tomlin	
8421	Gary Friend	
8422	Linda Barone	
8423	Steve Leuty	
8424	Joan Kaplan	
8425	Randy Harrison	
8426	Martha Jaegers	
8427	Annetta Winkle	
8428	Susan Dembowski	
8429	Laura Harrington	
8430	Robin Swanson	
8431	ana capestany	
8432	Joy Smiley	
8433	James Whitelock	
8434	Patricia Irr	
8435	Phyllis Erwin	
8436	Jonathan Newberry	
8437	Cheryl Weiden	
8438	Carol Moldoveanu	
8439	Mon Mor	
8440	Victoria Fuller	
8441	Diane Dorn	
8442	Megan Garrett	
8443	Keitha Farney	
8444	WJ Richardson	

Submission ID	Name	Organization Name
8445	Mary Steen	
8446	Roxanne LaChapelle	
8447	Roxene Miller	
8448	Michael Gelfer	
8449	Larry Andersen	
8450	Lenny Segel	
8451	Peter Doval	
8452	Evan Krichevsky	
8453	Anca Vlasopolos	
8454	Musia Stagg	
8455	Martha Lammers	
8456	Richard Adams	
8457	Anina Carr	
8458	Dona Renfro	
8459	Jim Gear	
8460	David Kurz	
8461	Cathy White	
8462	Sanford Leuba	
8463	Marsha Swartz	
8464	Stephen Zettel	
8465	Scot Seader	
8466	Shelby L. Hood	
8467	Norma Wade	
8468	garry FELDMAN	
8469	Victoria Miller	
8470	Patricia Pippin-Emanuel	
8471	Sandra Hansen	
8472	Guillermo Valencia	
8473	Sara Birkhead	
8474	Norman Emanuel	
8475	Leonardo Nunez	
8476	Glenn Dunn	
8477	Belinda Dodd	
8478	Josepn Goodsell	
8479	Mr. Hall	
8480	Tomi Mathew	
8481	Mark Meeks	
8482	Karen Fulkerson	
8483	Henry Berkowitz	
8484	Noble Roth-Saalberg	
8485	Joe Azzarello	
8486	Christie Getz	
8487	Ray Derrickson	
8488	Dick Dierks	
8489	Donald Ries	
8490	Drew Bentley	
8491	Camille Ellis-Vickers	
8492	Benna Sherman	
8493	Trudi Howell	
8494	I Acky	
8495	Karynn Merkel	
8496	Carrol Grady	
8497	Elaine Cadman	
8498	Joanne Woodruff	

Submission ID	Name	Organization Name
8499	W. D	
8500	Anthony Faciano	
8501	Michael Rasco	
8502	Camille Chong	
8503	William Hoover	
8504	Sally Small	
8505	Marya Fitzgerald	
8506	Jeff Hansen	
8507	Lynn Spencer	
8508	Kathryn Carroll	
8509	Christine Doyka	
8510	VIRGINIA ARADIO	
8511	Brita Skarbrevik	
8512	Kristine Winnicki	
8513	Harry Santi	
8514	Michele Friedman	
8515	Ralph Collier	
8516	Barbara Wiltz	
8517	Allen Roeder	
8518	Kenneth Miller	
8519	Gerald Smolinsky	
8520	Lana Fryers	
8521	Sheila Kliegl	
8522	Shaun G	
8523	Tor Goodwin	
8524	Virgil Nieman	
8525	Dorothy Pasquinelli	
8526	Doreen Mann	
8527	Bari Brookman	
8528	Teresa Phillips	
8529	Michael Chiodo	
8530	Eugene Brusin	
8531	Trise Ruskay	
8532	William Trapnell	
8533	Robert Johnson	
8534	Anna Cowen	
8535	M. Robin Church	
8536	bob giambalvo	
8537	Karen Nielsen	
8538	Christine Coffin	
8539	Merritt Tilley	
8540	Laura Guttridge	
8541	Cynthia Hicks	
8542	glenn gawinowicz	
8543	Shela Hadley	
8544	Paul Densmore	
8545	David Bennett	
8546	colin podhaski	
8547	Berton Stevens	
8548	I. Engle	
8549	Roberta Roskam	
8550	Laura Schulz	
8551	J.P. Sherman	
8552	Bob and Genie McCombs	

Submission ID	Name	Organization Name
8553	Karen Jones	
8554	Rachelle Rea	
8555	Jacob Dickinson	
8556	G N	
8557	Charles Voss	
8558	Katherine Gilbert	
8559	Keith Britton	
8560	Derek Gendvil	
8561	Frank Wyse	
8562	Linda McKillip	
8563	Bobbie Fredsall	
8564	Tim Maxton	
8565	Timothy Raymond	
8566	Eric Pavlak	
8567	william rigo	
8568	Barbara Baker	
8569	Kenneth Hall	
8570	Daniel Dick	
8571	Margaret Craig	
8572	Timothy Bowley	
8573	Leslie Lethridge	
8574	Charles Jonaitis	
8575	Tony Espinosa	
8576	Vivian Deutsch	
8577	Paul Counsell	
8578	Freya Christensen	
8579	Kevin Giehl	
8580	Michelle Ku	
8581	Mr.Christopher Jennings	
8582	Robin Nadel	
8583	Renie Harris	
8584	Marcia Torpey	
8585	Craig Stallone	
8586	Charles Mace	
8587	Randi Byron	
8588	Jo Young	
8589	James Bourget	
8590	Betsy Webster	
8591	Linda Henning	
8592	Ed Kenney	
8593	Kevin O'Brien	
8594	Tracey Bonner	
8595	Kathren Leek	
8596	Alan Berg	
8597	Neal Steiner	
8598	Mark Oehlberg	
8599	Katherine Murdock	
8600	Thomas Tassinari	
8601	Edward Cowan	
8602	Gene Jones	
8603	Donna Sherlock	
8604	Harvey Dym	
8605	Cheryl Herr-Rains	
8606	Kerri Sevenbergen	

Submission ID	Name	Organization Name
8607	Linda Martin	
8608	Wendy Stanford	
8609	Robert Ayers	
8610	Jean Siegel	
8611	Eric Carlson	
8612	Joyce Skolte	
8613	Todd Southworth	
8614	Vikki Helperin	
8615	Melanie Murphy	
8616	glenn majeski	
8617	Howard Steeley	
8618	Philip Englert	
8619	Ann Becker	
8620	Nancy Nilssen	
8621	Susan Ervin	
8622	Brandon Perras	
8623	Margaret Mear	
8624	Jessica Tatton	
8625	Brent Gunderson	
8626	Nicola Giorgio	
8627	James Moore	
8628	Dan And Lilly Kittredge	
8629	Richard Han	
8630	Julie Burciaga	
8631	Bob Ramlow	
8632	Della Hamlin	
8633	Judith Hisch	
8634	Diane Coiner	
8635	Rolf Friis	
8636	C. Lee	
8637	c s	
8638	Jane Lyon	
8639	Max Balakoff	
8640	Liliana Stansbury	
8641	R. Scott Burns	
8642	Janine Solano	
8643	Dave Delson	
8644	Jerry Balabanian	
8645	Lezlie Ringland	
8646	Nancy Heck	
8647	henry price	
8648	Alan Wojtalik	
8649	Ruth Bauzo	
8650	Jim Gammon	
8651	Cory Kaufman	
8652	Richard Schoemer	
8653	Alexander Filippini	
8654	Susan Emde	
8655	Marisa Gonzalez	
8656	Silas Swanson	
8657	Carlotta Mannheim	
8658	Francine Lipka	
8659	Clark Nelson	
8660	Erik Schwendeman	

Submission ID	Name	Organization Name
8661	Kate Robinson	
8662	Knox Cummin	
8663	Linda Schrader	
8664	Derek Chase	
8665	Malcolm Perry	
8666	Mary L. Johnson	
8667	Dorri Raskin	
8668	Paul Brindel	
8669	Bruce Miller	
8670	J Sadler	
8671	Laurie Leland	
8672	Rebecca Lippmann	
8673	Jim Stein	
8674	Debra Wendt	
8675	David Gluck	
8676	Lee Backus	
8677	Gail Flanders	
8678	Peter Humphries	
8679	Heather Howard	
8680	Anthony Kent	
8681	Melissa Cleaver	
8682	Conrad Willeman	
8683	Nicolette Ausschnitt	
8684	S F	
8685	Arianna McNamara	
8686	Ed Teitcher	
8687	Temple Fawcett	
8688	Penny Altman	
8689	Michele Tornabene	
8690	Joe Joyner	
8691	Bradley Buchanan	
8692	Ralph and Rita Greenberg	
8693	Richard Honeycutt	
8694	Wendy Michael	
8695	Sydney Bialek	
8696	Joseph Haemmerle	
8697	Elaine Thander	
8698	Kelsy Ballesteros	
8699	William Velapoldi	
8700	Rosemary Colson	
8701	Scott Milam	
8702	William Garrard	
8703	Denise Altrath	
8704	Paul Kinnison	
8705	Betsey Granda	
8706	Enid Breakstone	
8707	Donna Olsen	
8708	George Williams	
8709	Thomas Dorsey	
8710	Michael Burmester	
8711	George Faulkner	
8712	Judith A Costello	
8713	Kathryn Cihak	
8714	Benjamin Park	

Submission ID	Name	Organization Name
8715	David Walsh	
8716	Janis Craven	
8717	David F Webb	
8718	Sue Christiansen	
8719	Beth Hawes	
8720	Laurie Leland	
8721	Abigail Howes	
8722	Christine Manns	
8723	Mera Wolf	
8724	Paul Mangold	
8725	Kevin Macdonald	
8726	gary bushey	
8727	Michael Martin	
8728	Shannon Patty	
8729	Robert Rossachacj	
8730	William Shattuck	
8731	Bobbie Knight	
8732	Carol and Arnold Klukas	
8733	William W Smith	
8734	Melodie Huffman	
8735	Deborah Cosentino	
8736	Rob Hanson	
8737	Virginia Watson	
8738	Don McKenzie	
8739	Sandra Myers	
8740	Ernetta Skerlec	
8741	James Wightman	
8742	Janeene Porcher	
8743	Barbara Witney	
8744	Scott Swanson	
8745	Pamela Endean	
8746	Bill Macartney	
8747	Jeff Wersal-LaVelle	
8748	Lee Alley	
8749	Bettina Goodall	
8750	Bradley Mahaffey	
8751	Nikki Nafziger	
8752	Jan Brin	
8753	Taffi Newhouser	
8754	Gisela zech	
8755	David Longacre	
8756	Rosemary Wills	
8757	Pete Poole	
8758	Beth Carpenter	
8759	Megan Lachapelle	
8760	Julia VandeGrift	
8761	Steven Nielsen	
8762	James Rausch	
8763	Judy Scriptunas	
8764	Shirley Brown	
8765	Sean Russell	
8766	BEN WILDMAN	
8767	Laura Lyons Lyons	
8768	Mitchell Stachowicz	

Submission ID	Name	Organization Name
8769	Leni Gerber	
8770	Richard Johnson	
8771	Joann Fechner	
8772	David White	
8773	Jerry Gahan	
8774	Robin Pappas	
8775	Peter Melka	
8776	Kristy Pace	
8777	Chris Hart	
8778	Julie Bernstein	
8779	Norma McCulloch	
8780	jason Husby	
8781	Roberta Marine	
8782	J McClain	
8783	Nancy Sadowsky	
8784	Kevin Curtis	
8785	Chester Payne	
8786	Heather Cross	
8787	Lorraine Schmidt	
8788	Joanna Dewey	
8789	Cynthia Carlton	
8790	Bonnie Lindstrom	
8791	Kyle Embler	
8792	Ann Allen	
8793	M. Doretta Cornell	
8794	Ashley Carter	
8795	Georgette Miller	
8796	Riley Brannian	
8797	Diana Williams	
8798	Martha Brimm	
8799	Lila Luce	
8800	Roberto Fazio	
8801	David Cavallo	
8802	Erica Franklin	
8803	Bob Cutshall	
8804	Joyce Sincher	
8805	Tim Bardell	
8806	Lynn Hamilton	
8807	Larry Denio	
8808	Lili Sachar	
8809	Mary Wolter	
8810	Jane Dineen	
8811	Elizabeth Songalia	
8812	Jack Milton	
8813	John Wozniak	
8814	Amy Mueller	
8815	Richard Ziegler	
8816	Terry Robeson	
8817	Anthony LaRocca	
8818	David Thacker	
8819	Shreeraj Sutaria	
8820	Jane Grove	
8821	Betty David	
8822	Jeffrey Wig	

Submission ID	Name	Organization Name
8823	Byron Fogel	
8824	Beth Olson Schmidt	
8825	Donna Webb	
8826	Todd Milner	
8827	Linda Beardi	
8828	Maurene McGrain	
8829	Myra Malkin	
8830	Alice LeTourneau	
8831	Victoria Fox	
8832	Karen Fleming	
8833	Virginia Dwyer	
8834	Robert Bible	
8835	Leesa Wiesner	
8836	Betty Kissilove	
8837	Joey Frangione	
8838	Sarah Wright	
8839	R L	
8840	Patrick De La Garza Und Senkel	
8841	Pat Richter	
8842	Jeffrey Dean	
8843	Greg Gaucher	
8844	Trina Novak	
8845	Susanne Varlese	
8846	Debra Saude	
8847	Mary Jane Rhodes	
8848	Susan Scorso	
8849	James Rallo	
8850	John Lundborg	
8851	Erma Lewis	
8852	Bret Johnson	
8853	William Fennema	
8854	Elizebeth Ponce	
8855	Bill King	
8856	Kevin Quail	
8857	Bart Stevens	
8858	Mary Steinborn	
8859	Paul Krumm	
8860	Michael Aguilar	
8861	Sandra Cavanaugh	
8862	Angela Cuthbert	
8863	Patricia Carpenter	
8864	Ed Baker	
8865	John Gruninger	
8866	Kay Randall	
8867	Helgaleena Healingline	
8868	Christine Ney	
8869	Mitch Parkinen	
8870	Peter Guerrero	
8871	Roy Wilsker	
8872	Barry Auman	
8873	Laurie S	
8874	Jeffrey Shuben	
8875	Rose R Aranita	
8876	Lynn Person	

Submission ID	Name	Organization Name
8877	Lauren Oehler	
8878	Pat Fair	
8879	John Jakoby	
8880	Ronald Harkov	
8881	Heidi Nurse	
8882	Linda Owen	
8883	Joseph Lawson	
8884	Steven Cypher	
8885	Robert DiGiovanni Jr.	
8886	Dennis Young	
8887	Emily Dickinson-Adams	
8888	Maggie Manchester	
8889	Daniel I Hohenstein	
8890	Takako Ishii-Kiefer	
8891	David Lockman	
8892	Jeffrey Womble	
8893	Beth Horwitz	
8894	Cynthia McKnight	
8895	AE DeWitt	
8896	Mary Clark	
8897	Chuck Karp	
8898	Mary Blickensderfer	
8899	Carlton Thomas	
8900	Diane Soddy	
8901	Traver Cowles	
8902	Jaime Marshall	
8903	Jaime Marshall	
8904	Kaya Foster	
8905	Donna Logan	
8906	Bill Herman	
8907	Lindsay Moore	
8908	Morgan Snyder	
8909	Nancy Jinks	
8910	janet tunick	
8911	Charlene Donovan	
8912	James Dolan	
8913	Elizabeth Carol Edwards	
8914	Kevin McKelvie	
8915	Karen Johnson	
8916	Michael Peale	
8917	Richard Berman	
8918	R. Snider	
8919	Chris Drumright	
8920	Charles Heinrichs	
8921	Diana Harrison	
8922	Gary Simmons	
8923	Nicole Mikals	
8924	Traver Cowles	
8925	Randy Kempka	
8926	Brandon Kozak	
8927	Louise Mahatcek	
8928	Susan Stansberry	
8929	Cathy Lewis-Dougherty	
8930	Barbara Brooks	

Submission ID	Name	Organization Name
8931	Martina Kligenfuss	
8932	Julianne Martinson	
8933	Gwen Clark	
8934	Dodd Willingham	
8935	Patricia Stevens	
8936	B Carmichael	
8937	Glenn Greff	
8938	Robert Sanford	
8939	Helen King	
8940	Dayle Sherba	
8941	Brian Keck	
8942	Adam Jackaway	
8943	Michael Beight	
8944	Robert Ridgard	
8945	gina vsyrja	
8946	Adi S	
8947	Theodore Brazeau	
8948	M. Hope Hamilton	
8949	Carla Wilson	
8950	George Ball	
8951	Sarah Greene	
8952	Ismet Kipchak	
8953	Jan Kragh	
8954	Miles Varner	
8955	thalia Lubin	
8956	Olivia Factor	
8957	Per Zeeberg	
8958	michael starks	
8959	Barbara Abraham	
8960	Judith Griffin	
8961	Peter Schaettle	
8962	Richard Gallo	
8963	Christopher Smith	
8964	James Norton	
8965	john conway	
8966	Donald R Ferrell PhD	
8967	William Yaroeh	
8968	J D	
8969	Jan Ebersole	
8970	Vincent Smith	
8971	Jean Gore	
8972	Vasu Murti	
8973	Joann Ramos	
8974	Linda Schwenker	
8975	Joyce Durkin	
8976	Ian Taylor	
8977	Donna Graham	
8978	Barbara MacCarone	
8979	Louise McNulty	
8980	Jeanne Messing	
8981	Richard Fowlkes	
8982	Lamont Garrett	
8983	Lise Sayer	
8984	Kelli Gilbert	

Submission ID	Name	Organization Name
8985	Clint Landeen	
8986	vicki Anderson	
8987	Barbara Poulsen	
8988	Gregory Penderghest	
8989	Kristin Freeman	
8990	Patricia Lattanzia	
8991	Jill Casty	
8992	Carol OConnor	
8993	Pamela Richmond	
8994	Mikael Estarrona	
8995	S. Jordan	
8996	Cristian Castro	
8997	nina rossi	
8998	Leslie Frederick	
8999	Jean Owen	
9000	Marian Cox	
9001	Bradley Colden	
9002	Edmond Green	
9003	Annette Raible	
9004	Patricia Savage	
9005	Mel Apodaca	
9006	Rick Klein	
9007	Jill Sarkady	
9008	Sue Johnston	
9009	Nancy Gutierrez	
9010	Beth Sweetwater	
9011	David Dalton	
9012	Bonnie Spanier	
9013	David Karlovich	
9014	Carmel Dagan	
9015	Elisabeth Guss	
9016	Martha McGuirk	
9017	Dolores O'Dowd	
9018	Philip Glaser	
9019	Samuel Jeyanayagam	
9020	Vernon Apple	
9021	Ann Friedman	
9022	Gregory Crockett	
9023	Shirley Collins	
9024	Mary Drabbs	
9025	Steve Garrett	
9026	Paul Vesper	
9027	Mary Lebert	
9028	Sheila Messer	
9029	Kevin Pendleton	
9030	Alexa Wall	
9031	Ingrid Varnell	
9032	Tony Magliano	
9033	William Baumgartner	
9034	Elliot Gordon	
9035	Sharon Barone	
9036	Terri Pigford	
9037	Fran Seldin	
9038	Cassandra Tereschak	

Submission ID	Name	Organization Name
9039	Scheree Davis	
9040	Heather Dale	
9041	Diane Luck	
9042	Janine Morgan	
9043	Georgia Shankel	
9044	Ally Matteodo	
9045	Anna Sydnor	
9046	Laura Ross	
9047	Marla Feierabend	
9048	Albert Myers	
9049	Edward Landler	
9050	Michael Seager	
9051	Andra Heide	
9052	Donna L. Harris	
9053	Bonnie Kenny	
9054	Jeff Harvey	
9055	Carol Yerden	
9056	Julaine Roberson	
9057	Ella Craig	
9058	Phyllis Jordan	
9059	Karla Silva	
9060	Janice Beyer	
9061	Candace Waters	
9062	Mercedes Armillas	
9063	Dorothy and Gavin Bornholtz	
9064	Kristen Gould	
9065	Charles Favorite	
9066	Maria Ballardo	
9067	Rodriguez Garner	
9068	Teresa Bessett	
9069	Janet Bovenkerk	
9070	Sean Sheeley	
9071	Elizabeth McAuliffe	
9072	Jessica Munton	
9073	Matthew Lubs	
9074	Myra Sparesus	
9075	Jeffrey Jones	
9076	Nancy-Bets Hay	
9077	Emily Sagovac	
9078	Douglas S Dyer	
9079	Christina Hardy	
9080	Kenneth Fisher	
9081	Joel Leitner	
9082	Laura L Hutchinson	
9083	Virginia Chapman	
9084	Seth Mazze	
9085	Natalija Sale	
9086	Edward Kansa	
9087	James Chalfant	
9088	Thomas Wolslegel	
9089	Susanne Hesse	
9090	Rev. J. Howard Cherry	
9091	Tal Allweil	
9092	Andrew Isoda	

Submission ID	Name	Organization Name
9093	LH Schubert	
9094	F Meek	
9095	Connie Allison	
9096	John And Pj Liebson	
9097	Lance Robert	
9098	Sandra Speicher	
9099	Lise Hull	
9100	R.G. Tuomi	
9101	Nancy Auster	
9102	Linda Walters	
9103	Tami Phelps	
9104	Kris Lacy	
9105	Kelly Saunders	
9106	Dolores Wisbrock	
9107	Bob Gates	
9108	Robert Nelson	
9109	Eva Melas	
9110	Mary Hoyt	
9111	Gillian Whatmore	
9112	Susan Yanta	
9113	F Meek	
9114	Andrea Cockerham	
9115	R Bruce Cooper	
9116	David and Betsy Lamp	
9117	Robert Behrstock	
9118	Barbara Kepley	
9119	Christie Walters	
9120	Abbygale Huffman	
9121	Bob Steininger	
9122	Laura Strong	
9123	Catherine Inabnit	
9124	Marion Gerrish	
9125	Justin Pikula	
9126	Susan Wasserman	
9127	Jessica Zickefoose	
9128	Stephanie C. Fox	
9129	Rex Franklyn	
9130	Margo Kirby	
9131	Richard Pross	
9132	Blair Reynolds	
9133	Ellen Atkinson	
9134	Marianna Mejia Contact	
9135	Irene Kranenburg	
9136	Beth Rosenblum Kessinger	
9137	Jeff Muller	
9138	Jennifer Aiken	
9139	F Meek	
9140	Lindsey Huddleston	
9141	Thomas Akers	
9142	Christina Lauritsen	
9143	Wendy MacAuley	
9144	Brittany Tabler	
9145	Yostine Pasek	
9146	Cheryl Bilberry	

Submission ID	Name	Organization Name
9147	Barb Morrison	
9148	Barry Peterson	
9149	Julie Griffith	
9150	Tom Sanchez	
9151	Jim Thomas	
9152	Dylan Mariah	
9153	Gary Ryan	
9154	Linda Blatnik	
9155	Therese Lung	
9156	Rea Rabinowitz	
9157	Patricia Fleetwood	
9158	Thomas Lutgens	
9159	Pat Beach	
9160	Sharen Oxman	
9161	Dawn Skok	
9162	Sandra Goodwin	
9163	Shawn Johnson	
9164	Anne Sturm	
9165	Rebecca McDonough	
9166	W D	
9167	Bill Darnell	
9168	Mary McGeary	
9169	Vanessa Jamison	
9170	Kenneth Larson	
9171	Martha Baxter	
9172	Danielle Roth-Johnson	
9173	Cindy Pardee Phil McPherson	
9174	Linda Olsen	
9175	Linda Niemi-Wood	
9176	Elliott Stone	
9177	K. Youmans	
9178	Louise Bianco	
9179	John McKee	
9180	Jeff Green	
9181	Linda Robinson	
9182	Tim Bartell	
9183	Kristi and Tom Weir	
9184	Gregory Mize	
9185	Alison Bundy	
9186	Nancy Fonenko	
9187	MIchele Johnson	
9188	Tish Paye	
9189	Marlene Tucay	
9190	Wendy McCobb	
9191	David Turner	
9192	Kerry Chapman	
9193	helga Burkhardt	
9194	Bobby CHIN	
9195	Melodie Chrislock	
9196	Jessica Berger	
9197	Diana Vandel	
9198	Masum Azizi	
9199	Geoffrey Garrett	
9200	Jim Manger	

Submission ID	Name	Organization Name
9201	Victoria Miller	
9202	SUSAN I GOODRICH	
9203	L. L. Wilkinson	
9204	Mary Keithler	
9205	Lisa Goldman	
9206	Carol Taylor	
9207	Richard Stachurski	
9208	Frances Palacio	
9209	Lisa Burke	
9210	Susan Morris	
9211	George Penedo	
9212	Dan Caruso	
9213	Tyler Newton	
9214	Albert DeCarlo	
9215	Ronald Damholt	
9216	Charles Hendriks	
9217	Marguerite Sgrillo	
9218	Judith Metzener	
9219	Ernest Johnson	
9220	Scott Sinclair	
9221	Roz Forman	
9222	Nuriya Janss	
9223	Deb Federin	
9224	Councilman Alfredo Castillo	The City of Bridgeport
9225	bill Manser	
9226	Cari Park	
9227	Karina Black	
9228	Holly Burgin	
9229	Anita Roberson	
9230	Patrick Watson	
9231	Morris Applebaum	
9232	Jeremy Haugh	
9233	Andrea Zajac	
9234	Don Thompson	
9235	Timon Tesar	
9236	Deborah Sheinman	
9237	Brent Spencer	
9238	Chad Johnson	
9239	Chris Nelson	
9240	Kendra Holt	
9241	Anne Laurance	
9242	Laura Horowitz	
9243	Shawna Hedley	
9244	John Kellermeyer	
9245	Cindy Beckley	
9246	Tad Sullivan	
9247	N. Dumser	
9248	John Wooldridge	
9249	Robert Tyson	
9250	Christine Zecca	
9251	David Harris	
9252	Rev. Claire Beutler-Cruise	
9253	Drew Schultz	
9254	Richard Sparkes	

Submission ID	Name	Organization Name
9255	Dale Carpenter	
9256	Amanda Breaznell	
9257	Ralph Wilson	
9258	Christopher Lawrence	
9259	Salissa Chavez	
9260	Judith Stambouly	
9261	Pierre Beauregard	
9262	Ray Barnard	
9263	Dora Hage	
9264	Robbie White	
9265	daniel sterner	
9266	Theodore Swanson	
9267	Geoffrey Crouse	
9268	Barry Macomber	
9269	Mike Washil	
9270	John Griffin	
9271	Erin Haugh	
9272	Rick Thompson	
9273	Sharon Mattern	
9274	Mark Weakland	
9275	Leonard Baron	
9276	Charlene Longacre	
9277	Bence Toth	
9278	Michael Oblander	
9279	Charles David Drum	
9280	R. Maddern	
9281	David Nowlis	
9282	MARK BARKAN	
9283	Michael Filip	
9284	Joe Roy	
9285	Yolanda Stern Broad PhD	
9286	Joy Laclaire	
9287	Carol Schaffer	
9288	David Garrett	
9289	Joseph Corbett	
9290	Yvette Kimball	
9291	Aida Marina	
9292	Chrissy Hoffman	
9293	Richard Herzog	
9294	Geoffrey Brooks	
9295	Theo Williams	
9296	Theodore Beloin	
9297	Louise Yohalem	
9298	John Gilpin	
9299	Jessica Ramirez	
9300	Annabelle Herbert	
9301	Laura Jernigan	
9302	Ken Box	
9303	Rachel Scarlata	
9304	nathalie Camus	
9305	michael zuckerman	
9306	Nawal Tamimi	
9307	Maria-Celeste Delgado-Librero	
9308	Linda Sindelar	

Submission ID	Name	Organization Name
9309	Jeanine Farrell	
9310	Mark Cohen	
9311	Kathy Fish	
9312	Michael Curtis	
9313	Mary Jo Butler	
9314	Carolyn Holbrook	
9315	Judy Stambouly	
9316	Keith Turek	
9317	Emily Huff	
9318	Tony McClain	
9319	Nada Fisher	
9320	Elizabeth Elder	
9321	Timothy Simmons MD	
9322	Diana Shepard	
9323	David And Mary Wiley	
9324	Brent Rocks	
9325	Jim Gray	
9326	Steve Kowal	
9327	Heidi Nielsen	
9328	Gregory Duncan	
9329	Todd Smith	
9330	Scott Davis	
9331	Gladys Overton	
9332	Richard Kesling	
9333	Lenore Charles	
9334	Norm Nisbet	
9335	Peg Borchardt	
9336	Jen Messina	
9337	Cliff Pixler	
9338	Bernadette Andaloro	
9339	Jon Moulesong	
9340	Paula Barrett	
9341	Carol Cook	
9342	Kenneth Bierman	
9343	Al Blazo	
9344	Brian Burt	
9345	Joshua Seff	
9346	Joanna Chesnut	
9347	Jack Schramm	
9348	Katy R.	
9349	Juliann Rule	
9350	Nancy L. and Bert A. Anderson	
9351	Fred Martin	
9352	Arnold Wolk	
9353	Mary Hood	
9354	Katherine Schmidt	
9355	Brittney Hazboun	
9356	Tom Swanson	
9357	William Hollman	
9358	John P. Hayden	
9359	Tristin Pollet	
9360	willis gravelle	
9361	Loretta Aja	
9362	Patricia Thomas	

Submission ID	Name	Organization Name
9363	Barbara Gautier	
9364	Barbara Norton	
9365	Chip Henneman	
9366	Karl Harris	
9367	Gudrun Murti	
9368	Kaelyn Foss	
9369	Sharon Hobrock	
9370	Stephen Goldsmith	
9371	Janice Jack	
9372	K L	
9373	Patricia Stewart	
9374	Mina Blyly-Strauss	
9375	Michael Wagner	
9376	Matthew Radecki	
9377	leslie spoon	
9378	Charlie Smith	
9379	Deborah Pfeiffer-Traum	
9380	Bret Polish	
9381	Susan Carlson	
9382	Jenni Kovich	
9383	Leticia Garcia	
9384	Dona Pereira	
9385	Carl Berry	
9386	Donna Brooks	
9387	Charlotte Baltus	
9388	Oscar Bird	
9389	Kristin Womack	
9390	John Naylor	
9391	Deborah Portney	
9392	Meighan Morrison	
9393	Patricia McKelvie	
9394	Melvin Bautista	
9395	Garth Tuttle	
9396	Marjorie Gelber	
9397	Jennifer Toller	
9398	Michael O'Malley	
9399	Jan Jones	
9400	Pam Overholtzer	
9401	Marlene Mills	
9402	Linda Mitchell	
9403	Jan Jones	
9404	Liane Pei	
9405	Mari Mennel-Bell	
9406	Dennis Ace	
9407	Bruce Ellinwood	
9408	Eileen Juric	
9409	John Surr	
9410	Robert Jones	
9411	chris berti	
9412	James Dixon	
9413	Bruce Cox	
9414	Russell Gay	
9415	Peter Arzberger	
9416	Catol Mock	

Submission ID	Name	Organization Name
9417	Cheryl Vosburg	
9418	Patricia Baley	
9419	Marc Daniel	
9420	Kate Crowley	
9421	Steven Ketchel	
9422	Lorraine Hartmann	
9423	Stephen Nickels	
9424	Robin Gotfrid	
9425	Sheri De Avila	
9426	Judy Beachler	
9427	Christopher Finley	
9428	Emilie McCarthy	
9429	Kara Howard	
9430	Joyce Barringer	
9431	Lynne Kane	
9432	James Klein	
9433	Carol Steinhart	
9434	Jillian Saxty	
9435	Leigh Yeoman	
9436	Pamela Lyngen	
9437	Krista Lohr	
9438	Greg Orzech	
9439	William Davis	
9440	Michael Uργο	
9441	Mary Roma	
9442	Florentina Mehta	
9443	Daniel Magennis	
9444	Louis Fischer	
9445	Glenn Embrey	
9446	Cody Rudow	
9447	Keith Phelps	
9448	John A Beavers	
9449	Marianella Torres	
9450	Diana Aston	
9451	Bryan Ashby	
9452	Pat Boyd	
9453	Eric Weiss	
9454	Donna Pope	
9455	Josie Benton	
9456	Ann Stratten	
9457	Vii Wee	
9458	Barbara Whyman	
9459	Tom Lennon	
9460	Tom Cannon	
9461	Margo Salone	
9462	Michael Christie-Fogg	
9463	Freya Harris	
9464	W Wright	
9465	Janet Hansen	
9466	Gary Moore	
9467	Dan Sherwood	
9468	Joseph Rodriguez	
9469	Jeffrey McCollim	
9470	Mike Younkin	

Submission ID	Name	Organization Name
9471	Dena Hulbert	
9472	Natalie Stephens	
9473	Jane Butler	
9474	Scott Bishop	
9475	Marshall Primack	
9476	Jonathan Kennedy	
9477	James Marsh	
9478	Susan Wechsler	
9479	Susan Szulc-Flissi	
9480	mia heavyrunner	
9481	Debra Cameron	
9482	Jerry McCauley	
9483	Edith Smith	
9484	William Phelan	
9485	Deepa Prasad	
9486	Sandra Heffernan	
9487	AIDA Bound	
9488	Jeffrey Passlow	
9489	Sunshine Benoit	
9490	Margaret McNeil	
9491	george benton	
9492	Ruth Gregory	
9493	Martha Price	
9494	Wayne Goldsboro	
9495	Skidmore Skidmore	
9496	Kenneth Wright	
9497	Robert Mason	
9498	Joel Kay	
9499	Janet Silverman	
9500	Genevieve Whitehaus	
9501	Sarah Franklin	
9502	Christopher Brooks	
9503	Timothy Miller	
9504	Kathleen Gallagher	
9505	Diana Cowans	
9506	Jon Bazinet	
9507	Dan Tobin	
9508	Fred Granlund	
9509	Walter John Bankovitch	
9510	Marguerite Foley	
9511	James Wilcox	
9512	Steven Velasco	
9513	Marie Driscoll	
9514	Charles Leps	
9515	Susan Stephens	
9516	Pat Hawthorn	
9517	Charles Christopher	
9518	Raymond Nuesch	
9519	Elizabeth Gray	
9520	Kyle Martinez	
9521	Nola Zito and Family	
9522	Anna Darland	
9523	Chris Evans	
9524	Barbara Morrison	

Submission ID	Name	Organization Name
9525	Pat Reese	
9526	Curt Bohlen	
9527	John Bryan	
9528	Robyn Phillips	
9529	Nikki Longaker	
9530	Ray Keeling	
9531	Wendi Quest	
9532	Jim Buonocore	
9533	russ ziegler	
9534	Ellen Sanford	
9535	Sneed Collard	
9536	Nancy deStreel	
9537	Peter Bergel	
9538	Mark Barbash	
9539	Michael Kadoya	
9540	Chris Peck	
9541	April Jacob	
9542	Mark Hurst	
9543	Tanner Vandenbosch	
9544	Jackie Schmid	
9545	John Baker	
9546	Carmen Andrews	
9547	Alix Keast	
9548	Kent Iverson	
9549	Edward Grund	
9550	Daniel Slade	
9551	Joe Baggett	
9552	Terry Yingling	
9553	Alexandra Elson	
9554	JACQUELINE EDMONDSON	
9555	Lawrence Howerton	
9556	Lorna Lewers	
9557	Renee Cossutta	
9558	James Nelson	
9559	Denise Kozminsky	
9560	Michael Matthews	
9561	Sarah Parr	
9562	Elizabeth Via	
9563	Connie Cavara	
9564	THOMAS HALLAL	
9565	Barbara Mathes	
9566	Vicki Brooks	
9567	Steve Bloom	
9568	Kaija Jones	
9569	Ross Heckmann	
9570	Joanne Rios-Velez	
9571	burnett Watkins	
9572	Joseph Naidnur	
9573	Cheryl Putnam	
9574	Erin Locke	
9575	Gene Parsons	
9576	Richard Geltman	
9577	Marge Ziegenfuss	
9578	Sarah Hearon	

Submission ID	Name	Organization Name
9579	Eric Sheffield	
9580	Linda Wasserman	
9581	Gordon Kelly	
9582	Richard Partlow	
9583	Judy Whitehouse	
9584	dale riehart	
9585	Priscilla Dioquino	
9586	Donna Sharee	
9587	Marian Kirkpatrick	
9588	Vic DeAngelo	
9589	C L Brear	
9590	Donna Koechner	
9591	Lauren Amick	
9592	Elizabeth Gilthvedt	
9593	Guy Taylor	
9594	Maureen Jessnik	
9595	Karen Wilson	
9596	Michael Kaltenberg	
9597	Linda Dres	
9598	Gerry Stamper	
9599	Fran Amos	
9600	Mini Liu	
9601	Jan Hunter	
9602	Mike Ablor	
9603	Tem Narvios	
9604	Judi Poulson	
9605	Greg Thomas	
9606	miguel ramos	
9607	Kathy Bean	
9608	Dale Katzen	
9609	Eric Wessman	
9610	mark youd	
9611	Rachael Riccobene	
9612	Tom Cooney	
9613	Malcolm Simpson	
9614	Eilene Janke	
9615	David Meade	
9616	Theresa Johnson	
9617	Sandra Thorn	
9618	Stacey Bernstein	
9619	J Elise Edwards	
9620	Keith Fisher	
9621	Diane Vandiver	
9622	Elliot Shamis	
9623	Mary Mazzer	
9624	David Long	
9625	Ardyth Gilbertson	
9626	Nanette Wizov	
9627	Richard Steiger	
9628	Andrew Reich	
9629	Harry Storey	
9630	Florence Davis	
9631	Tim Barrington	
9632	Elizabeth Rice	

Submission ID	Name	Organization Name
9633	Robin Gray-Woodall	
9634	k ca	
9635	David Peale	
9636	Maria Endler	
9637	CATHERINE GRANT	
9638	Veronica Liebert	
9639	DANIEL OGRADY	
9640	Abigail Ramirez	
9641	Linda Bolton	
9642	Jeri Sampson	
9643	Norman Yoshida	
9644	Susan Pride Caulum	
9645	Suzann graf	
9646	Mary Ann Rotondo	
9647	Silvia Hall	
9648	Ian Shelley	
9649	Doug Tait	
9650	Edward Hall	
9651	Samuel Todd	
9652	Ed Conyers	
9653	Michael C	
9654	NATASHA Hopkinson	
9655	Heather Williams	
9656	Sue Shimer	
9657	Bonnie Burke	
9658	Heather Ruckman	
9659	Tudor Craescu	
9660	Karen Cornell	
9661	Angela Plagge	
9662	Carol Devoss	
9663	Robert Bailey	
9664	Kathleen Pyne	
9665	Stanley Sherry	
9666	Cheryl Eames	
9667	Natasha Lehman	
9668	Scott Barlow	
9669	Tom Jennings	
9670	Ellen Samson	
9671	Sam Morrison	
9672	Jeanine Weber	
9673	Judith Herzfeld	
9674	Mary Maher	
9675	Gary Wieselmann	
9676	Lauretta Rion	
9677	Christine Pielenz	
9678	Patrick Conley	
9679	kate babb	
9680	Mark Grzegorzewski	
9681	RoseMarie Balch	
9682	Gerald Young	
9683	Susan Evilsizer	
9684	Ron Pipa	
9685	Diane Englander	
9686	Charles Kirk	

Submission ID	Name	Organization Name
9687	Kathryn Christian	
9688	Bruce D Chambers	
9689	Judy Ryder	
9690	Jacob Rubel	
9691	CS Symington	
9692	Maria Cardona	
9693	Amber Acord	
9694	Margaret McCabe	
9695	William Blair	
9696	Julene Newland-Pyfer	
9697	Phil Heinlein	
9698	Stephen Schaffzin	
9699	Rose Bostaph	
9700	Joe McQueeney	
9701	James Crowley	
9702	Al Daniel	
9703	Mark Dunagan	
9704	Rick Sparks	
9705	Rebecca Burmester	
9706	Lorin Silverman	
9707	Claire Goldthwaite	
9708	Susan Alice Mufson	
9709	Lynn Lavezzi	
9710	Signe Stuart	
9711	Mindy Epstein	
9712	Mary Wiener	
9713	Alicia Salazar	
9714	Mona Chatterji	
9715	Lynn Foster	
9716	Lyle Broschat	
9717	Scott Cowan	
9718	Carol G	
9719	Marcia Geiger	
9720	Sharon Frank	
9721	Kathryn Davidson	
9722	Greta Rossi	
9723	Maryanne Rafferty	
9724	Ralph Lopez	
9725	Ross Ridder	
9726	Patricia Lessard	
9727	Ingeborg Overby	
9728	Lois White	
9729	James L. McCall	
9730	Philip Randall	
9731	Rudy Ramp	
9732	Alexandria Luostari	
9733	Les Rees	
9734	Kristin G	
9735	Jennifer Walsh	
9736	Paul Owens	
9737	Robert Sanford	
9738	Sandra Fedyakov	
9739	Elaine Werner	
9740	Geri Ott	

Submission ID	Name	Organization Name
9741	Thomas Moyer	
9742	Emily Seay	
9743	Sandra Gamble	
9744	Bill Chockla	
9745	LeeAllen Meyer	
9746	Cynthia York	
9747	Thomas Hand	
9748	Lisa Kauh	
9749	Jana Pendragon	
9750	BobbyKat LittleCub	
9751	John Brown	
9752	Fred Cooper	
9753	Nonnie Locke	
9754	Richard Herrema	
9755	Delaine Spilsbury	
9756	Gavin Dillard	
9757	Marie McMillen	
9758	Leni Windle	
9759	Barbara Scavezze	
9760	Laura Northcraft	
9761	camille kershner	
9762	Eric Weller	
9763	Kenneth L Pitts	
9764	Joseph Graham	
9765	Mark Aziz	
9766	Richard Alderman	
9767	Beverly Tiemann	
9768	Richard Smith	
9769	Alyson Shotz	
9770	Christine Joseph	
9771	Kimball Wright	
9772	Antonia Raikes	
9773	albert rogat	
9774	Melinda Robinson-Paquette	
9775	Sally Coates	
9776	Vivi Spicer	
9777	Brook Finch	
9778	K Sward	
9779	James Mulcare	
9780	Jeanne Out	
9781	Maki Murakami	
9782	Ren Flores M.	
9783	BONITA BEARD	
9784	Spencer Ledlow	
9785	Stephen Greenberg	
9786	Calvin Rittenhouse	
9787	Hillary Tiefer	
9788	Suzanne Staggenborg	
9789	mary oneil	
9790	caren shiloh	
9791	Cynthia Williams	
9792	Lois Lommel	
9793	Susan Chung	
9794	James Sylver	

Submission ID	Name	Organization Name
9795	Daniel Fountain	
9796	Leah Hallow	
9797	Charlene Stender	
9798	Virginia Corwin	
9799	Aryeh Hoffman	
9800	John Whitney	
9801	Pat Blackwell-Marchant	
9802	Christina Dilko	
9803	David Ball	
9804	David Zeff	
9805	Michael Brandes	
9806	Kenneth Hill	
9807	Laurence Margolis	
9808	Pamela Hughes	
9809	Amy Marwood	
9810	Pilar Hattori	
9811	Scott Kuehn	
9812	JL Angell	
9813	Christine Marquette	
9814	Dan Schupack	
9815	Sylvia Valencia	
9816	Shawn Tuthill	
9817	Mary Bristow	
9818	Laura Divenere	
9819	Kathy Spera	
9820	Sallie Robbins-Druian	
9821	Mark L. Nelson	
9822	Robert Roberts	
9823	Amy Roberts	
9824	Carolyn Hahn-Re	
9825	Sheri Abramson	
9826	Alfred Walter	
9827	Paula Fenda	
9828	Janice Rowse	
9829	Martha Beck	
9830	C de Ben	
9831	Andrew Johnson	
9832	Laurie Toner	
9833	Barbara Swyden	
9834	Linda Roberts	
9835	David Berry	
9836	Ann Pryich	
9837	George Brewer	
9838	William Golove	
9839	Jeff Gold	
9840	Yvonne White	
9841	Carlene Okula	
9842	Audrey Marks	
9843	Eliza M.	
9844	Susan Urang	
9845	Caryn Graves	
9846	Anthony Tupasi	
9847	Randall Black	
9848	Phyllis Guerra	

Submission ID	Name	Organization Name
9849	Robert Konuch	
9850	MaryEllen Meli	
9851	John Lodenkamper	
9852	Dorothy Wiseman	
9853	Greg Flood	
9854	Leslie Hankey	
9855	Helenmary Hotz	
9856	Scott Gorrell	
9857	Howard Donaghy Doaghy	
9858	Kathe Garbrick	
9859	Ronald And Deidre Brown	
9860	Carl Grimm	
9861	Betsy Mueller	
9862	Melanie Procopio	
9863	John Monti	
9864	Lois White	
9865	Steve Yingling	
9866	Diane Bastian	
9867	Eugene Hamond	
9868	Stephen Zimmer	
9869	Mary Kurtnick	
9870	Dennis Dougherty	
9871	James Sumler	
9872	Carol Creech	
9873	John Tovar	
9874	Jim Rimes	
9875	ranella arnett	
9876	John Bertaina	
9877	Kelly Krick	
9878	Kathryn Coutcher	
9879	Kenneth Tullipano	
9880	Rocio Luparello	
9881	Sharon Daskal	
9882	Mary Pat Lenahan	
9883	Mary L Current	
9884	john griffith	
9885	Catharine Garber	
9886	Melva Mills	
9887	Yma Corrales	
9888	Dawn Albanese	
9889	Allison Brody	
9890	Ronald Schlesinger	
9891	Elaine Parker	
9892	Vernon Groves	
9893	Jeanne Varel	
9894	Gregry Loomis	
9895	Jim Magill	
9896	William Hufford	
9897	Miriam Dunbar	
9898	Joe Marsala	
9899	Todd Walker	
9900	Rose Rohrer	
9901	William Roberson	
9902	Liz Reisman	

Submission ID	Name	Organization Name
9903	Nicholas and Joanne Cartabona	
9904	Janet Rich	
9905	Lilly Blase	
9906	John Foraste	
9907	Wayne Welke	
9908	Theodore Koeman	
9909	Robert Brosius	
9910	Linda Swick	
9911	Sam Asseff	
9912	Joanne Ryan	
9913	Rachel Behnke	
9914	Ray Kelly	
9915	Ellen E Barfield	
9916	Frank Wyse	
9917	Jeri Altman	
9918	Gail Atkins	
9919	Kathy Sweeney	
9920	Brian Rutkin	
9921	Trevor Hart	
9922	John Hagen	
9923	Leonard Tremmel	
9924	Phyllis Kepner	
9925	Mary Knightly	
9926	Kelly Hudson	
9927	Deborah Carroll	
9928	Dorri Raskin	
9929	Judith Oesterle	
9930	Clinton Roche	
9931	Stephen Rosen	
9932	Jim Hackman	
9933	Melissa K	
9934	Rolando Rodriguez	
9935	Patricia Cavanaugh	
9936	Stan Kumiega	
9937	Joseph Carfagno	
9938	Ken Smeltzer	
9939	Judith Moehring	
9940	Charles Grotzke	
9941	Thomas Lavin	
9942	M. Charlotte Barton	
9943	Susan Joslyn	
9944	Sharon Fasnacht	
9945	Toni DiDonato	
9946	Gerald Stankiewicz	
9947	Joyce Dixon	
9948	Jay McCahill	
9949	Charles Froelich	
9950	Philip Englert	
9951	Debbie Denton	
9952	Ximena Davalos	
9953	Michelle Snyder	
9954	Ron Price	
9955	Shel Anderson	
9956	Susan Sloan	

Submission ID	Name	Organization Name
9957	Nancy Atherton	
9958	thomas murray	
9959	Annemarie Avanti	
9960	William Persky	
9961	Ronald Pauly	
9962	Cynthia Dyrnes	
9963	Frances Harris	
9964	Nancy Riggleman	
9965	Irv Snyder	
9966	Douglas Mc Corkle	
9967	Kimm Tynan	
9968	Emilio Brunetti	
9969	Linda Townill	
9970	Stephanie Christoff	
9971	Wayne Steffes	
9972	Laura Strom	
9973	Paula Summers	
9974	Robert Granger	
9975	Barbara McMahan	
9976	Dodie Sweeney	
9977	Gary Barton	
9978	Jane Bolig	
9979	Kerry Ramsey	
9980	Janet Falcone	
9981	Pete Sabey	
9982	Daniel Stewart	
9983	Doreen LeBel	
9984	Chris Dahle	
9985	steve babb	
9986	Benjamin Hubbard	
9987	Ryan Baka	
9988	Peter Galvani	
9989	Tom McCulloch	
9990	Lura Irish	
9991	Paul Doelling	
9992	Steven Hester	
9993	Elaine Delaney-Winn	
9994	Karen Kindel	
9995	Patricia Wynn	
9996	Kyle Peterson	
9997	David J. Krupp	
9998	Lori Gudmundson	
9999	Renee Roper	
10000	Genevieve Rafferty	
10001	Peter Schumacher	
10002	Phyllis Newburn	
10003	Kristina Gilbert	
10004	Alan Stultz	
10005	Ei Celli	
10006	Lucy Duroche	
10007	R. Giles	
10008	Bruce Gordon	
10009	Robert L. Travaline	
10010	george scribner	

Submission ID	Name	Organization Name
10011	Jerry Oliver	
10012	Rusty Cohn	
10013	Ann Miller	
10014	Michael Martin	
10015	Jeanne Marie Mller	
10016	Carla Hess	
10017	Jeanine Center	
10018	Regina Bennett	
10019	Christine V Fink	
10020	Helen Read	
10021	Chris Moser	
10022	Christopher Ecker	
10023	Virginia Smedberg	
10024	Bruce England	
10025	Ian Wade	
10026	Albert Ahronheim	
10027	Mary Mooney	
10028	Paul Ferrari	
10029	Debbie Flynn	
10030	Michael Baron	
10031	Aron Rubin	
10032	John Whitney	
10033	P Pierce	
10034	Rebecca Courtney	
10035	Phillip Bryan	
10036	Christine Carlson	
10037	Corinne Runkle	
10038	Jane Church	
10039	Michael New	
10040	Nicole Salgado	
10041	Timothy Alstrum	
10042	George Roberts	
10043	DANIEL HENLING	
10044	Karen Roy	
10045	Lynn Ricci	
10046	Diane Huber	
10047	Molly Huddleston	
10048	Elisa Greco	
10049	Justus Derx	
10050	Georgianna Morgan	
10051	Robert Sprowl	
10052	Betty Jacobsen	
10053	Judith Murphy	
10054	Winston Perry	
10055	Fiona Priskich	
10056	Justin Chernow	
10057	Ingrid Chan	
10058	Mary Downey	
10059	Eric Youngquist	
10060	Charles Anderson	
10061	Winifred Daisley	
10062	Diane Miller	
10063	Mary E Yoder	
10064	J Tuomey	

Submission ID	Name	Organization Name
10065	Theresa Murphy	
10066	George Roberts	
10067	Susan Honey	
10068	Jane Kurt	
10069	Frances Sears	
10070	Norman Ceaglske	
10071	Vivian Moore	
10072	Amelia Jones	
10073	Billye Turner	
10074	John Walker	
10075	Valerie Paterson	
10076	John Lopez	
10077	Cornelius McKown	
10078	Sheri Opp	
10079	Ron De Stefano	
10080	Norda Gromoll	
10081	Cherie Odgers	
10082	Randall Boltz	
10083	Joseph Kenosky	
10084	Margaret Chisholm	
10085	Deborah Anderson	
10086	J C GAYHARTT	
10087	Terry Crownover	
10088	William Ryerson	
10089	Rachel Saxon	
10090	Thomas Keane	
10091	Sheryl Nowak	
10092	Laurel Kornfeld	
10093	Paula Shafransky	
10094	Anna Freeman	
10095	Jennifer DiMarco	
10096	Craig Hunkins	
10097	RICHARD CURRY	
10098	Jean Perkins	
10099	Dwight Sanders	
10100	Janice Duplex	
10101	Virginia Ward	
10102	Nancy Rihards	
10103	Alexander Jones	
10104	Suki Winship	
10105	Lea Morgan	
10106	Danielle Ifrah	
10107	Vicki Matheny	
10108	Debra Gary Hendricks	
10109	Diana Scheer	
10110	Robert Macek	
10111	Mark Taylor	
10112	HARRIET GROSE	
10113	Andrew Costigan	
10114	Denis Bonny	
10115	Philip Chambers	
10116	Jim Stewart	
10117	Judith Hauck	
10118	Trisha Terwilliger	

Submission ID	Name	Organization Name
10119	Ronald smith	
10120	Arlene Patoray	
10121	Rick Romito	
10122	John Casey	
10123	Jacqueline Birnbaum	
10124	Kathy Bradley	
10125	Michael Perez	
10126	Brandon Boe	
10127	Marjory Keenan	
10128	Shelly Young	
10129	John Hayes	
10130	Amy Gregord	
10131	Aram Haroutiounian	
10132	Fred Mallery	
10133	Judith Scholfield	
10134	Margaret O'Hara Best	
10135	Karolyn Schalk	
10136	Selina Martin	
10137	Jennifer Sahn	
10138	Paula Andersen	
10139	Marin Alan Quezada	
10140	Alyssa Melton	
10141	Sarah Burtner	
10142	Everett E Dennis	
10143	Susan Davidson	
10144	Tom Thompson	
10145	David Kallstrom	
10146	Raquel Buxton	
10147	David Topham	
10148	Robert Henninge	
10149	Randolph Schoedler	
10150	Ada Shaum	
10151	Zena Lamp	
10152	Jocelyne Kauffman	
10153	Brad Goodner	
10154	Kathryn Conrad	
10155	Linda Hay	
10156	Sharon Lozon	
10157	Margie Lachman	
10158	William Stoffel	
10159	Richard Warren	
10160	Susanne Haas	
10161	Marlene Kuypers	
10162	Arleen Zuniga	
10163	Duskey Mallory	
10164	Donna Grubbs	
10165	Heidi Hohman	
10166	Elizabeth Kelley	
10167	Tonya Michel	
10168	Lisa L	
10169	Pat Annoni	
10170	Kathleen Allen	
10171	Doris Applebaum	
10172	Gilda Fusilier	

Submission ID	Name	Organization Name
10173	Robert Check	
10174	Johanna Daggett	
10175	Paul Ghenoiu	
10176	Nancy Bruud	
10177	Robert Young	
10178	Lisa Appleton	
10179	Jennifer Bentsen	
10180	Paul Servizio	
10181	Dorothy Hynous	
10182	Patricia Richter	
10183	Leota Ester	
10184	Damien Shulock	
10185	Stanley Serlin	
10186	Ari Berkowitz	
10187	Nancy Martin	
10188	Christopher Wolfe	
10189	Steve Kiffmeyer	
10190	Rachel Hess	
10191	Bruce Rauscher	
10192	Sarah W Gallagher	
10193	Ralph Bocchetti	
10194	Lynda Kieffer	
10195	Chris Guillory	
10196	Matt Williams	
10197	Annie Riley	
10198	Daniel Parr	
10199	Robert Strelke	
10200	Michael Budniak	
10201	Barbara Piszczek	
10202	Jeff Kiralis	
10203	Lawrence -Carolyn Rice	
10204	Roger Coates	
10205	Barbara Bonfield	
10206	Francisco J Salazar	
10207	Bill Dinsdale	
10208	Dawn Rutigliano	
10209	Kate Champa	
10210	Cindy Borske	
10211	Laura Anschicks	
10212	Jean Standish	
10213	marie lyndemere	
10214	Chester Regen	
10215	Susan Gosland	
10216	Alice Keyes	
10217	Horace King	
10218	Dalia Salgado	
10219	Lia Wilson	
10220	Robin Patten	
10221	Trina Mitchell	
10222	Mary Ferma	
10223	Patricia Daly	
10224	Thomas Terrill	
10225	Beth Doherty	
10226	David Mazumder	

Submission ID	Name	Organization Name
10227	KATHLEEN MOORE	
10228	Jorge De Cecco	
10229	Josef Koepl	
10230	David Wiley	
10231	Kara Gonterman Yoder	
10232	Kahlil Sibree	
10233	Penelope Loucas	
10234	Joyce Harris	
10235	Robert Ritchey	
10236	Llanda Richardson	
10237	Terry Bertolino	
10238	Jeff Hanna	
10239	Dale Preston	
10240	James Sassman Sassman	
10241	Beth Carr	
10242	Ralph And Kay Packard	
10243	Deirdre Weliky	
10244	David Tilli	
10245	Lynn Glielmi	
10246	Cecilia Seabrook	
10247	Jacob L. Schachter	
10248	Tom Quinn	
10249	Margaret Herten	
10250	Katherine Jain	
10251	Judy Alter	
10252	Ann Horwath	
10253	William Heer	
10254	bernice Silverman	
10255	Rosalie Sable	
10256	Shelley Fox-Loken	
10257	Chelsea Rugel	
10258	LISA STIMPSON	
10259	Kate Crawford	
10260	Joe McCullough	
10261	Suellen Barton	
10262	Joseph Hancock	
10263	Christina Maris	
10264	Samuel Sledd	
10265	Margaret Shekell	
10266	Bob Burr	
10267	Theron Akers	
10268	Tracy Heart	
10269	Twyla Meyer	
10270	Sharon Treistman	
10271	George Little	
10272	Kaytie Osterloh	
10273	mary camardo	
10274	Barbara Hughes	
10275	Ernest Schreiber	
10276	Christopher R Miller	
10277	Tony McCraney	
10278	Marion Kraus	
10279	Damien Coyle	
10280	Feoria Rhinehart	

Submission ID	Name	Organization Name
10281	John Daloni	
10282	Margaret Heatherly	
10283	Brian Newberg	
10284	Donna J. Phillips	
10285	Joseph DiMaggio	
10286	Norman Cherrix	
10287	Virginia Hulme	
10288	Danica Perez	
10289	Patrick Maloney	
10290	William Lusher	
10291	Mark Pecaut	
10292	Celeste Crockett	
10293	Frank DeFazio	
10294	Andrea Zimmerman	
10295	Bruce Kiesel	
10296	Fred Morris	
10297	Cas Overton	
10298	Linda Lobik	
10299	Charlene Maker	
10300	Jack Zeilenga	
10301	Barbara Wagner	
10302	Oron Bass	
10303	Karl Webb	
10304	Duncan And Betty Perry	
10305	Iris Meltzer	
10306	Kimberly Nelson	
10307	A Dean Caulfield	
10308	David Christman	
10309	Karen Linn	
10310	Gerald Hirschstein	
10311	Martha Campbell	
10312	A Diamond	
10313	Roger Burnett	
10314	Nicholas Wilhelm	
10315	Kate Ravenstein	
10316	Melissa Jolly	
10317	Kevin Kimmel	
10318	Madison Arnold-Scerbo	
10319	Pamela Hohberger	
10320	Gerald Kline	
10321	K. C. McCarthy	
10322	Nina Pykare	
10323	Evelyn Deese	
10324	Pat Leitch	
10325	William Edelman	
10326	David Finkel	
10327	Amy McCoy	
10328	KAREN McGUINNESS	
10329	Rose Middleton	
10330	Maureen Wheeler	
10331	Tony Moureilles	
10332	Jean Marie VanWinkle	
10333	Corlita Bonnarens	
10334	Julie Macdonald	

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10335	Luke Lefeber	
10336	Jeanine Fair	
10337	Rev. Paul Bern	
10338	Nikki Greenberg	
10339	Sundae Shields	
10340	Patrick Callanan	
10341	Christian Kurtz	
10342	Tim Hansen	
10343	Andrew Hunter	
10344	Peter Poage	
10345	David Michaels	
10346	Dawn Jackson	
10347	David Gassman	
10348	Jack Demorra	
10349	Flynn Delaney	
10350	Moya Hambridge	
10351	Ray Jeffery	
10352	Diane Berlin	
10353	Jeff Helyer	
10354	Nancy Kean	
10355	Jean Prokopow	
10356	Brigid Vele	
10357	Jean Skiles	
10358	Alex McVey	
10359	Blake Cady MD	
10360	Katherine Martinez	
10361	Wendy Fuchs	
10362	Dawn Lull	
10363	andy tomsky	
10364	Vanessa Kong	
10365	Audrey Urbano	
10366	Joshua Wallman	
10367	Leah Stables	
10368	David Neral	
10369	Jason Davis	
10370	Debra Swanson	
10371	Vicki Johnson	
10372	Rona Armillas	
10373	Karl Novak	
10374	Lisa-May Reynolds	
10375	Charlie Weaver	
10376	Jane Hull	
10377	Mick Alderman	
10378	Hal Glidden	
10379	Bp. Thomas H. Hooker.	
10380	Barry Kathrens	
10381	Elaine Mills	
10382	Norman Sandel	
10383	Rose Gansle	
10384	Megan Slattery	
10385	Cheryl Fahlman	
10386	Lily Turner	
10387	Donald Cook	
10388	Mary Sims	

Submission ID	Name	Organization Name
10389	Rev. Gerald Bishop	
10390	Robert Wohlberg	
10391	Terry Scoggins	
10392	Margaret O'Gorman	
10393	Elizabeth Powell	
10394	Jennifer Westra	
10395	Gene Stubbs	
10396	Linda Blythe	
10397	Tina Bartlett	
10398	Deena Bray	
10399	Louise Lund	
10400	Elizabeth Hodges	
10401	Dave Griswold	
10402	Deborah Smith	
10403	Mark Hemenway	
10404	Susan Nieh	
10405	Al Brooks	
10406	Colleen Carter	
10407	Reynolds Hahn	
10408	Erik Garcia	
10409	Abigail Dimen-Taylor	
10410	Vicki Bookless	
10411	Edward Rengers	
10412	Michael Hayden	
10413	Benjamin Chen	
10414	Pippa Pearthree	
10415	Jan Salas	
10416	Robert Quarrick	
10417	Raymond Ehrig	
10418	Laura Cotterman	
10419	Bette Smith	
10420	Margaret Chapman	
10421	Charlene Lauzon	
10422	Donna Fountain	
10423	Jacquelyn Helm	
10424	Luis Cavallone	
10425	Jesseca Ferguson	
10426	Pamela Magers	
10427	Glen Cotten	
10428	Michael Saunders	
10429	Marcia Flannery	
10430	Gary Peniston	
10431	Lee Schondorf	
10432	Herbert Elwell	
10433	Charles F. Schetlin	
10434	Garret Hobart	
10435	shirley mccarthy	
10436	Julianne Chen	
10437	Carmen Fried	
10438	Greg Miller	
10439	R Becca Britt	
10440	David Hoff	
10441	Buffie Gold	
10442	Tristan Donofrio	

Submission ID	Name	Organization Name
10443	Alice Wright	
10444	Arleen Kalenich-Pace	
10445	Robert Depew	
10446	Deborah Strzepek	
10447	Cheryl Rockwell	
10448	Patrick Bonner	
10449	Helen Kline	
10450	Timothy Maurer Maurer	
10451	John Massung	
10452	David Doty	
10453	Art Hanson	
10454	Beth Houston	
10455	George Cohen	
10456	Mark Virgin	
10457	Rebecca Mitchell	
10458	Barbara H Bruce	
10459	Andy Sayles	
10460	Clifford Hessel	
10461	Bruce Von Borstel	
10462	Richard Ohlendorf	
10463	Maria Williamson	
10464	Dana Spottswood	
10465	William Hayes	
10466	Matt Geer	
10467	Jason D Brown	
10468	Robyn Sumners	
10469	Don Sobocinski	
10470	Lourdes Copitas	
10471	Cathie Forman	
10472	Rebecca Mitchell	
10473	Yola Hesser	
10474	allie palmer	
10475	Charles Coston	
10476	Jim Dettmann	
10477	Terri Krebs	
10478	Rebecca Gilbert	
10479	Katherine Robinson	
10480	Brian Cocco	
10481	Randall Haines	
10482	Joshua Cooper	
10483	kelvin hobson	
10484	Rita Pesini	
10485	James Cooper	
10486	Debra Gray	
10487	David Savige	
10488	Stephen Dent	
10489	Adam Resnick	
10490	deborah cady	
10491	Barbara Andrew	
10492	Fred Karlson	
10493	Don McCann	
10494	Alexander Ingham	
10495	Leonard Elliott	
10496	Michael Bleicher	

Submission ID	Name	Organization Name
10497	Nancy Obyrne	
10498	Steven Sondheim	
10499	Rick Geyer	
10500	Robin Bressler	
10501	Michael Essex	
10502	Philip Marrone	
10503	Charles Dineen	
10504	Estelle Voelker	
10505	Michael Duhigg	
10506	L. Diaz	
10507	Barbara Gulino	
10508	Londa Fowler	
10509	Bryan and Susan Roberts	
10510	Annette Benton	
10511	Thomas Hazelleaf	
10512	Zoe Quinn	
10513	Susan Kutz	
10514	Mark Cosgriff	
10515	Andrew Witthaus	
10516	Emily Galpern	
10517	Ion herbert	
10518	Holly Nottingham	
10519	Jean Svadlenka	
10520	Eugene Hughes	
10521	Roxy Darling	
10522	Kathy Marie Behl-Whiting	
10523	Nonna Noto	
10524	Cathy Simmons	
10525	Ellen Levine	
10526	Gary Adler	
10527	Cheryl Wood	
10528	Melissa Jordan	
10529	Donald Smith	
10530	Norman Williams	
10531	Christine Woods	
10532	Scott Hill	
10533	Debbie Hill	
10534	Greg Loflin	
10535	Steve Wilson	
10536	Kevin Gallen	
10537	Patricia Keefe	
10538	Roger Ovink	
10539	June Elliott-Cattell	
10540	Terrence Hartz	
10541	A W	
10542	Robert Stoyles	
10543	Marian Vargas	
10544	Douglas Benedict	
10545	Phyllis Chavez	
10546	Bruce Pollock	
10547	Judy Hill	
10548	Marilyn Clark	
10549	Ariana Wible	
10550	Jarryd Audette	

Submission ID	Name	Organization Name
10551	Evan Ingle	
10552	Steve Smith	
10553	Derek Benedict	
10554	Milan Vigil	
10555	Anne Bowen	
10556	Tracy Foster	
10557	John Weston	
10558	Elizabeth Moore	
10559	Julia Natvig	
10560	Carol Wright	
10561	Arthur Schurr	
10562	Ann Willard	
10563	Robert Earl	
10564	Renganathan Subramanyam	
10565	Frances Goff	
10566	Bonnie Faith-Smith	
10567	Nancy D'Angelo	
10568	Kathy Kelly	
10569	Esther Leonard	
10570	Tim Stubbs	
10571	Julia Ying	
10572	Brenda Hayes	
10573	Dein Shapiro	
10574	William Webster	
10575	Patricia Kula	
10576	Derek Gendvil	
10577	Jim Dobson	
10578	Anja Phenix	
10579	Richard Stevens	
10580	Barbara Craig	
10581	Garrick Updyke	
10582	John Michaud	
10583	Ronald Marks	
10584	Farhad Farahmand	
10585	Peggy Reeves	
10586	Marc and Alice - Imlay	
10587	Gretchen Sand	
10588	Hunter Boswell	
10589	Barry Medlin	
10590	Sue Gier	
10591	Diane Boss	
10592	Mark Reinke	
10593	Diana Buchanan	
10594	Mary Jones	
10595	Patricia Nelson	
10596	Francine Ungaro	
10597	Richard Skinner	
10598	Louise Warren	
10599	Louise Warren	
10600	Carol Wiley	
10601	Paul Smith	
10602	Clifford Ryffel	
10603	John Reinhardt	
10604	Judith Mackenzie	

Submission ID	Name	Organization Name
10605	Gary Gall	
10606	Steven Yakes	
10607	Joan Barrett	
10608	Mary Dosch	
10609	Erin Wengerter	
10610	Jo Ingman	
10611	Sheila Smith	
10612	James Voight	
10613	Rev. Maurice Hagen	
10614	Jennifer Barton	
10615	Robert Frischmuth	
10616	Robert Burckhalter	
10617	Patricia Knoll	
10618	N Pfuetze	
10619	Jussi Gamache	
10620	warren nystrom	
10621	Suhas Malghan	
10622	Monique Hea	
10623	Marie Weis	
10624	Judy Perreault	
10625	Monique Hea	
10626	Barbara Toshalis	
10627	Noelle Tutunjian	
10628	Sharon Nicodemus	
10629	Julie Locascio	
10630	Stephen Brace	
10631	robert cobb	
10632	Jerry Meyer	
10633	John Wheeler	
10634	Bruce Blackwell	
10635	Lynne Boehm	
10636	Polly Ohman	
10637	Kathleen Grossman	
10638	Bethany Witthuhn	
10639	Alaya Bouche	
10640	Hartson Doak	
10641	Martin Smallen	
10642	Judith Allen-Leventhal	
10643	Linda Thompson	
10644	Colleen MacDonald	
10645	Rob Lozon	
10646	Barbara Lenarcic	
10647	Julie Ozias	
10648	Anne Way	
10649	Merry Hauser	
10650	Sharon Reganato	
10651	Monika McDole-Russell	
10652	Christopher Von Alt	
10653	Marshall Holloway	
10654	Andrew Hurckman	
10655	Janina Lem	
10656	Sheila Malone	
10657	Linda Carroll	
10658	Jeff Thomas	

Submission ID	Name	Organization Name
10659	Nancy McCullough	
10660	Yvonne Besyk	
10661	Suzanne Menne	
10662	Nancy Roberts-Moneir	
10663	Kara Illium	
10664	david j. lafond	
10665	Melodi Willis	
10666	Kevin Callahan	
10667	Mike Schuster	
10668	Doug Gerrard	
10669	Joyce Hanly	
10670	Joyce Hanly	
10671	Peter McCumber	
10672	Jen Rund	
10673	Edmund Wright	
10674	Belinda Caraballo	
10675	Dennis Mayer	
10676	Jean Washburn	
10677	Karen Phillips	
10678	Mark Feldman	
10679	Constance Waters	
10680	Jenne Sindoni	
10681	Jean Perri	
10682	Lynn Travis	
10683	Cynthia Benkert	
10684	Janice Beyer	
10685	Thomas Dowd	
10686	Lisa Stone	
10687	Sonia Sniderman	
10688	Elizabeth Hancock	
10689	Mair de Voursney	
10690	Linda Maher	
10691	Sumner Roper	
10692	Martha Green	
10693	Amy Dubman	
10694	Gloria Sefton	
10695	Christopher Rea	
10696	Marcus Bordsen	
10697	Richard Erickson	
10698	Brenda Murphy	
10699	Tracy Kanno	
10700	Wally Minnick	
10701	Rita Mahoney	
10702	Julia Wilson	
10703	Joe Placucci	
10704	George Munoz	
10705	Arthur Rosenberg	
10706	Cheryl Heinecke	
10707	Will Broderick	
10708	Janet Dietrich	
10709	Lynda Dobens	
10710	lyn capurro	
10711	Simone Biase	
10712	Wendy McCormick	

Submission ID	Name	Organization Name
10713	Chris Logan	
10714	Laura Brody	
10715	Patrick Jones	
10716	Don Wattenbarger	
10717	Georgiana Cohen	
10718	James Orr	
10719	REG HOLMES	
10720	Jennifer Stewart	
10721	Thomas Harrington	
10722	Linda Skisak	
10723	n b	
10724	fran sherry	
10725	John MacDonald	
10726	Mark Grassman	
10727	Susan Meeker	
10728	Gail Strong	
10729	Nancy Wyatt	
10730	Steve Gamblin	
10731	Burkhard Broecker	
10732	Roger Smith	
10733	Mary Kornbau	
10734	Melvin Siegel	
10735	Joseph Kaleel	
10736	David Miller	
10737	Machelle Smith	
10738	Sidney Halsband	
10739	Mark Gall	
10740	Michael Chutich	
10741	Garrett Butler	
10742	Faye Karson	
10743	Lindy Metz	
10744	Kristin TOSCANO	
10745	Elizabeth Eide	
10746	Joel Haber	
10747	Nicole Shaffer	
10748	Mike Noonan	
10749	Susan Lowe	
10750	Barbara Rhine	
10751	Robert Robinson	
10752	Prashanth Mundkur	
10753	Shari Galve	
10754	Robert Camp	
10755	Thomas Nicholas	
10756	Jay Unger	
10757	Walter Ramsey	
10758	Sister Barbara Juskiewicz	
10759	Anna Dresner	
10760	Beth Olson	
10761	Patricia Stephenson	
10762	Jim Lindsay	
10763	Tom Herman	
10764	Karen Hewelt	
10765	barbara risacher	
10766	Wanda Graff	

Submission ID	Name	Organization Name
10767	William CannonJr	
10768	Richard Hanusz	
10769	Michael Z	
10770	Jamie Roussel	
10771	Marilyn Thompson	
10772	Larry Mahlis	
10773	D Randolph Johnson	
10774	Jonathan Hill	
10775	Margaret Cathey	
10776	Dianne Carroll	
10777	Mary Ellen Linderman	
10778	Kim Steffen	
10779	Hamilton Regen	
10780	Sarah Pick	
10781	Richard Kornfeld	
10782	Carol Fletcher	
10783	Mary Wuellner	
10784	David Steber	
10785	Debra Skup	
10786	Sue Parker	
10787	Winifred Richman	
10788	Anthony Earls	
10789	Donald Chesebro	
10790	Lynne Preston	
10791	Jan Hillegas	
10792	Ulrich Ganz	
10793	Sister Sheila Stone	
10794	Gema del Rocio Munoz	
10795	Doug Kelley	
10796	janelle chase	
10797	Kristina Luka	
10798	Whitney watters	
10799	Marjorie Wisor	
10800	Frances Lamberts	
10801	robert fursich	
10802	Matthew OConnell	
10803	Carol Harrison	
10804	margaret scripp	
10805	Michael Leicht	
10806	Mary Jenson	
10807	Martin Keller	
10808	Judith Wilson	
10809	Carmine Gorga	
10810	Kathleen Fernandez	
10811	Joan Martinez	
10812	Copley Smoak	
10813	Lenore Reeves	
10814	Sue Morrison	
10815	Richard Small	
10816	Claudia Deviny	
10817	John Mallon	
10818	Leonard Jokubaitis	
10819	Neal Merbaum	
10820	David Brown	

Submission ID	Name	Organization Name
10821	Michael Dosch	
10822	Dorothy Oconnell	
10823	Janet Hood	
10824	Ann Reichling	
10825	Jody Ross	
10826	Cathy Muha	
10827	Charles Caswell	
10828	Joseph Angelo	
10829	Tylee Houchens	
10830	Tina Paloskey	
10831	George Hartman III R.Ph.	
10832	Rayline Dean	
10833	Daryl W. De Boer	
10834	Mary Russell	
10835	Frederick Palm	
10836	Richard Rawlinson	
10837	Tom Marsh	
10838	Madelaine Georgette	
10839	Murray Merner	
10840	Robert Guldin	
10841	Lisa Matthews	
10842	Joanne Hesselink	
10843	sam Kaplan	
10844	Kenton Lindley	
10845	Ken Thomas	
10846	Ivor Freeman	
10847	Dr. And Mrs. Cregg McCullin	
10848	FRAnces Recca	
10849	Brandy Ingargiola	
10850	Pat Arnold	
10851	virginia arnold	
10852	Sandra Rando	
10853	Louis Hanna	
10854	John Harkness	
10855	Edward Anapol	
10856	Dan Cox	
10857	Dan Gross	
10858	Marcia Silva	
10859	Bernie Meyer	
10860	Donald Barker	
10861	Tara Wheeler	
10862	Lee Paxton	
10863	Kathy Hall	
10864	S Davis	
10865	Rosina Miranda	
10866	Linda Hall	
10867	Geoffrey Garth	
10868	Ingrid Desilvestre	
10869	Dan Rusk	
10870	Ginny Jackson	
10871	Michele Fisk	
10872	Stephanie Cormier	
10873	Ralf Leeb	
10874	Margret Cifaldi	

Submission ID	Name	Organization Name
10875	Robert Jardine	
10876	Ray Kauffman	
10877	Jace Galley	
10878	james rosenfeld	
10879	Martha Reddout	
10880	Anka Jhangiani	
10881	Jason Catalano	
10882	Ivan Fuentes	
10883	Margaret Dowdy	
10884	Michael Basileo	
10885	James Peters	
10886	Mair McNamara	
10887	Lisa Goodwin	
10888	Lily Mejia	
10889	Ronald Moore	
10890	Betty Avila	
10891	Mark Rodgers	
10892	Richard Puaoi	
10893	Philip Young	
10894	KRISTEN ZEHNER	
10895	joan jobsis	
10896	Alan Foster	
10897	Randle Sink	
10898	Daniel Max Behl	
10899	Susan Lloyd	
10900	kellyann morander	
10901	Christine Child	
10902	Lawrence Ross	
10903	Allison Taylor	
10904	Glen Worrell	
10905	Harriet Cohen	
10906	Blanche Korfmacher	
10907	Joyce Chavez	
10908	Medora Van Denburgh	
10909	Michael Stark	
10910	Ferne Founds	
10911	Laura Long	
10912	Lorraine Jones	
10913	Glenn Yocum	
10914	Ruth Ann Cioci	
10915	David M Lipman	
10916	Joan Hughes	
10917	Hollace Wood	
10918	Dennis and Andrea Hopkins	
10919	Blanche Berridge	
10920	Vivian Perry	
10921	Mark Peltan	
10922	Marie Curtis	
10923	Mary Babineau	
10924	norman douglas	
10925	martha wing	
10926	RJ Cooper	
10927	Andrew Shapiro	
10928	Karla Kavanaugh	

Submission ID	Name	Organization Name
10929	Rose Ficker	
10930	Belinda Scott	
10931	Roberta Heist	
10932	Cindy McReynolds	
10933	Sheila Sylvester	
10934	Jim Callison	
10935	Cary De Vroedt	
10936	Steve Breyman	
10937	Duchess A. Swift	
10938	Rob Carter	
10939	Kay Ward	
10940	Martin Penkwitz	
10941	Bernadette Sheats	
10942	Evan Oxenham	
10943	JOHN CHARD	
10944	Jhene Canody	
10945	Charles Ellenberger	
10946	Marybeth Webster	
10947	Tom Nulty	
10948	Anice Cook	
10949	John Morris	
10950	Michael Doran	
10951	Linda Gilbert	
10952	Thomas Maurer	
10953	Elizabeth Rosenthal	
10954	Karen Springer	
10955	Clerc Daniell	
10956	Mark Zeljak	
10957	Bruce Denny	
10958	Cindy Powell	
10959	Steven Matusow	
10960	Jim Reynolds	
10961	Gretchen Himsl	
10962	Cathleen Brew	
10963	David Camp	
10964	Kathie Trapkin	
10965	Shabad Khalsa	
10966	Susan Clark	
10967	Allan Wysocki	
10968	Lotti Knowles	
10969	Jim Merkle	
10970	Sharon Kessler	
10971	Helen Swem	
10972	Elizabeth Orris	
10973	Kathryn Rose	
10974	Philip Lefcourt	
10975	alvaro garza	
10976	James Keffer	
10977	Dennis Stevens	
10978	Alicen Eatroff	
10979	Cynthia Marrs	
10980	Eva Suhr	
10981	Thomas McDonald	
10982	Victor Ortega	

Submission ID	Name	Organization Name
10983	Patricia Appel	
10984	Barbara Karcher	
10985	Clara Zahadek	
10986	Richard Biegun	
10987	Stephen Kendall	
10988	Patricia Safrin	
10989	Jack Stapleton	
10990	Kevin Quail	
10991	Ilene Gaffin	
10992	Setsuko Furuike	
10993	john thomas	
10994	Stephen Gliva	
10995	J M Harris	
10996	Elizabeth Drinkwine	
10997	Johanna Lindsay	
10998	Ann Thomae	
10999	Paul Palla	
11000	fran malsheimer	
11001	Kenny Jones	
11002	Pete Schwartz	
11003	James Fourqurean	
11004	Greg Singleton	
11005	Joyce Harris	
11006	James Mitchell	
11007	Nick Chrisos	
11008	Margarita Martinez	
11009	Alison La Barge	
11010	Albert R. Matheny	
11011	Fin Bunting	
11012	Brenda Ferguson	
11013	Steve Heitzenrater	
11014	Mr. Shelley Dahlgren PhD	
11015	Patricia Nadreau	
11016	James Campbell	
11017	Martha Larsen	
11018	Leigh Stamets	
11019	Linda Majdoch	
11020	Weldon Lewis	
11021	Phil Lipari	
11022	H. Hardouf	
11023	Nigel Lim	
11024	Fred Oswald	
11025	Laura Stclair	
11026	mark levin	
11027	David Katz	
11028	David Katz	
11029	Liliana Alvarado	
11030	Beth Jones-Expat In Austria	
11031	James Balder	
11032	Tom Kutscher	
11033	Frank Windes	
11034	E P	
11035	Ruvita Maharaj	
11036	Carolyn Dennison	

Submission ID	Name	Organization Name
11037	Lynn Morales	
11038	anita deming	
11039	Carla Wise	
11040	Dale McCarthy	
11041	John Evans	
11042	Jane Aukshunas	
11043	Randall Webb	
11044	Genavieve Koenigshofer	
11045	Kristen Allbritton	
11046	Suzy Chaffee	
11047	lorraine foster	
11048	Carol Pruner	
11049	Jane Engel	
11050	Roger Latham	
11051	Jessica Blasingame	
11052	Clara Bakker	
11053	Joseph Weir	
11054	Gregory LaBelle	
11055	Leo Sandy	
11056	John McGillicuddy	
11057	Jay Schelman	
11058	Martha Veselka	
11059	Wolfgang Benz	
11060	Olivia Pond	
11061	Matt Caldie	
11062	Tom Kabat	
11063	C Lambert	
11064	Krista Powell	
11065	Elsie Rawlins	
11066	Pamela Roger	
11067	James Schueler	
11068	Andrew Smith	
11069	Donna Peterson	
11070	Randall Nerwick	
11071	Linda Shapiro	
11072	Maury Swoveland	
11073	Barbara Smith	
11074	Virginia Bennett	
11075	Barbara Lasley	
11076	Cindy Greer	
11077	Trevor Snow	
11078	Robert Drey	
11079	Chad Ransom	
11080	Elizabeth Lynch	
11081	Molly Silsby	
11082	Edmond Marroni	
11083	E Suzan Matero	
11084	Charlie Jameson	
11085	Britta Cress	
11086	Allen Leinwand	
11087	brenda hartman	
11088	James Orsbern	
11089	matthew Bates	
11090	Phyllis Chavez	

Submission ID	Name	Organization Name
11091	Catherine Stevens	
11092	Elena Raden	
11093	Laura Miner	
11094	Lawrence D'Arco	
11095	J. Alessi	
11096	Thomas Lipkis	
11097	Erin Bryan	
11098	Heather Braut	
11099	Kim Kengor	
11100	Gloria Fooks	
11101	Marilyn Wilson	
11102	Candace Rocha	
11103	Gabriella Brown	
11104	Miriam Chapman	
11105	Laura Pitt Taylor	
11106	Henry Frank	
11107	Cynthia Pannucci	
11108	Duane Wilcox	
11109	Yael Kisel	
11110	Todd Smarr	
11111	Diana Bailey	
11112	Terry Angelli	
11113	Roger Burkhart	
11114	Elizabeth Billingham	
11115	K F	
11116	Joseph Reischel	
11117	Thomas Raedeke	
11118	J Diaz	
11119	Diana Glixman	
11120	Gordon McAllister	
11121	Sam Miller	
11122	Nicole Knauber	
11123	Kara Kockelman	
11124	Valerie Delaune	
11125	Jennifer Bendio	
11126	Terry Eaton	
11127	Ken McElroy	
11128	Vinay Arora	
11129	Susan Alexander	
11130	Katherine Masotti	
11131	Damian Smith	
11132	Robert Knauber Jr	
11133	Mary Pryde	
11134	Laura Waterworth	
11135	jeffrey mccarty	
11136	ms. j. cohen	
11137	Andria Ganley	
11138	Cynthia Hicks	
11139	Kim Housekeeper	
11140	Summer Stevens	
11141	Colleen Joe - Civ O'Meara	
11142	Thomas Tupper	
11143	Nancy Neuman	
11144	Sophia Keller	

Submission ID	Name	Organization Name
11145	Ellie Joseph	
11146	Keith And Jackie Menasco	
11147	Kenneth Genco	
11148	Maria Carmen Pedroza	
11149	Herbert Pummer	
11150	Frank Mele	
11151	Blake Chartier	
11152	Riley Canada II	
11153	Larry Denio	
11154	Candace Marx	
11155	Lisa Jones	
11156	Kevin McCormick	
11157	John Manning	
11158	Gabriel Sheets	
11159	Bret Gorman	
11160	Thomas Pozen	
11161	Kenny Boecker	
11162	Sarah Sheets	
11163	Cheryl Diehl	
11164	Lauren Meredith	
11165	Myrna Lipman	
11166	Dean Seward	
11167	Mildred Bursler	
11168	Mark Laity-Snyder	
11169	Bruce Fritzges	
11170	George Dillmann	
11171	Gail Plotkin	
11172	Dan Lombardo	
11173	David Armington	
11174	John Wesner	
11175	Kathleen Slattery	
11176	Hadley Gallen	
11177	J.A. Clayman	
11178	Roger Widenoja	
11179	Jeffrey Horejsi	
11180	Ivy Buchanan	
11181	Regina Lester	
11182	Lynda Daniels	
11183	Michael Levin	
11184	Katherine Pierce	
11185	Jan Pierson	
11186	Elizabeth Lott	
11187	Karen Walker	
11188	Rita Rufo	
11189	Roland Saeger	
11190	Diana Jorgensen	
11191	Holly King	
11192	Andrea Diaz	
11193	Thomas Williams	
11194	Eve Gordon	
11195	Ken Mundy	
11196	Bonnie Ferguson	
11197	Rob Jolly	
11198	Arnold Advocate	

Submission ID	Name	Organization Name
11199	Dawn R. Casper	
11200	Silvia Leahu-Aluas	
11201	Nan Singh-Bowman	
11202	Karl Channell	
11203	Nora Carranco	
11204	Toni Dan	
11205	Joyce Childress	
11206	Toni Deslaurier	
11207	Dawn Zelinski	
11208	Bonnie Miller	
11209	Trudi Rust	
11210	Alesandra Di Giovanni	
11211	Patrick Comer	
11212	Neal Pardee	
11213	Caitilin Kane	
11214	Ruby Weeks	
11215	Larry Lambeth	
11216	Mary Anne Hoover	
11217	M Chessin	
11218	Aurette Sprout	
11219	Norma Itule	
11220	Alexander Blaine	
11221	Jeff Twine	
11222	J Pearlman	
11223	Suzanne Dalton	
11224	Bert Jackson	
11225	Chuck Tucker	
11226	Rebecca Fletcher	
11227	Susan Lasprugato	
11228	Jeffrey Kominers	
11229	James Flessa	
11230	A. Myrick Freeman III	
11231	Marc Diller	
11232	Carolyn Thomas	
11233	Kurt Schultz	
11234	M.S. Theroux	
11235	Phyllis Webb	
11236	Jonathan Eden	
11237	Sandra Butler	
11238	Barbara Jacoby	
11239	Josh Feldblyum	
11240	Pamela Sheridan	
11241	Brenna McNamee	
11242	Karen Katrinak	
11243	G. D.	
11244	Robert Miles	
11245	Jane Schwamberger	
11246	Gillian Miller	
11247	Yvonne Grams	
11248	Shaun Snyder	
11249	Steven Smith	
11250	Andrea Saunders	
11251	David R. Smith	
11252	Lisa Sadler	

Submission ID	Name	Organization Name
11253	Kristopher Burrell	
11254	Diana Palm	
11255	Dawn Matta	
11256	Dawn Matta	
11257	Ivana George	
11258	Dawn Matta	
11259	CHERYL MURGA	
11260	Laval Choiniere	
11261	elizabeth banwell	
11262	melanie lipton	
11263	Jacob Harmon	
11264	Wolfgang Fischer	
11265	Deborah Lyons	
11266	Arthur Squillante	
11267	William Clary	
11268	Eric Duggan	
11269	Trudy Preston	
11270	Brad Smit	
11271	Janet Allison	
11272	Bobby Keeland	
11273	A. Obermeier	
11274	Nicole Beck	
11275	David C Kopaska-Merkel	
11276	Patrick Quinn	
11277	David Kehas	
11278	Mara Carman	
11279	Jaquelin Camp	
11280	Steve Neeley	
11281	Karen Boehler	
11282	K Brown	
11283	Kelly Siranko	
11284	Victoria Boatwright	
11285	Chris Dacus	
11286	Michael Raymond	
11287	pat andring	
11288	Bruce Troutman	
11289	Ashley Koster	
11290	Connie Woodring	
11291	Susan Martinez	
11292	Marjorie Spagnuolo	
11293	Erica Brinker	
11294	Gail Lynch	
11295	Jim Koster	
11296	Kevin Hines	
11297	Friedrich Juhle	
11298	Erica Runge	
11299	Frank Silagy	
11300	Daniel Grimley	
11301	Katha Ricciardi	
11302	Thomas Stoll	
11303	Adam Parente	
11304	Dena Lenard	
11305	Emily Amizich	
11306	Christopher Jones	

Submission ID	Name	Organization Name
11307	Pamela Olson	
11308	Jennifer Boron	
11309	Anita West	
11310	Dale Dupuis	
11311	James Hawk	
11312	Nicole Taylor	
11313	John and Karen Olsen	
11314	Sheila Rosenberg	
11315	Carol White	
11316	Joan Swan Swan	
11317	Theresa Thornburg	
11318	Nancy Jane Zoulalian	
11319	Liz Sherblom	
11320	Paul Pickard	
11321	Julie Nelson	
11322	David A. Woolsey	
11323	Amy Louvier	
11324	R D	
11325	Karen Mallozzi	
11326	Don Ford	
11327	Bethany Eldred	
11328	Gabriele Betancourt-Martinez	
11329	Vinit Allen	
11330	Sallie Davis	
11331	Steven Cook	
11332	Serena Sposato	
11333	Katherine Borsody	
11334	Ann White	
11335	Carole Blake	
11336	James Finlay	
11337	Bailey Salerno	
11338	Jennifer Poggiali	
11339	Michelle Kenyon	
11340	V Van Rheen	
11341	d Johnson	
11342	Mark Persons	
11343	Dianne J. Stein	
11344	Allen Aigen	
11345	W Malcom	
11346	e Neiman	
11347	Steve Steele	
11348	Doris Loud	
11349	Janice Kurkoski	
11350	Tammy Ensman	
11351	R.S. Tracy	
11352	Sue-Ann Schuldt	
11353	Steven West	
11354	Catherine Iliff	
11355	Marybeth Diss	
11356	Holly Frey	
11357	Stephen Halpern	
11358	Holly Frey	
11359	Stefany Garza	
11360	Pamela True	

Submission ID	Name	Organization Name
11361	Judy Richards	
11362	Cindy Shoaf	
11363	Don B. Meriwether	
11364	Cortney Murphy	
11365	Weldon Williams	
11366	Sarah Drake	
11367	Kathy Sabatini	
11368	gj rosenberg	
11369	DyAnn Andybur	
11370	Max Ernst	
11371	Leslie Smith	
11372	Marta Overpeck-McCracken	
11373	JAY RICHARDS	
11374	Darryl Worthy	
11375	Carolyn Kibbe	
11376	Sabrina Hogan	
11377	E Fazio	
11378	Sean Brandlin	
11379	John Freeze	
11380	Cat Motycka	
11381	Philip Simon	
11382	Norm Conrad	
11383	Danielle Palermo	
11384	Suhail Shafi	
11385	Cynthia Muscat	
11386	Frances McDonal	
11387	Carolina Valenzuela	
11388	Harvinderjit Saran	
11389	Mary Ragsdale	
11390	Arthur Heiserman	
11391	Anita Cuttler	
11392	Victoria Wu	
11393	Kate Transchel	
11394	Dee Randolph	
11395	Lindsey Ford	
11396	Marla Feldhacker	
11397	Yvonne Marley	
11398	Ed Fullman	
11399	Lawrence Magliola	
11400	Jesse DeMartino	
11401	Elena Belias	
11402	Judith A. Knilans	
11403	Jessie Ferri	
11404	Donna Delin	
11405	Martin Watts	
11406	Daniel Callahan	
11407	Jessie Casteel	
11408	Patricia Holbert	
11409	Nick Hood	
11410	jennifer baugh	
11411	Rebecca Wicker	
11412	Megan Knight	
11413	Charles Grammer	
11414	Roy Windmuller	

Submission ID	Name	Organization Name
11415	Nancy Jo Kirk	
11416	Florie Rothenberg	
11417	John J Knapp	
11418	Eileen Trainor	
11419	Veronica Gonzalez	
11420	Nicole Denison	
11421	William Rowe	
11422	Bruce D Burleigh	
11423	Nancy Jo Kirk	
11424	Jim Cocke	
11425	Margaret Weant-Leavitt	
11426	C Ruth	
11427	Aaron Mlynek	
11428	Leah Killeen	
11429	Lilian Burch	
11430	BARBARA CHIDESTER	
11431	Mary Baker	
11432	Gerhard Eckardt	
11433	Ellen Osborne	
11434	Jimmie Yonemoto	
11435	Rebecca Desmond	
11436	J Pizzo	
11437	Matthew Saxe	
11438	Lisa Gaye Holden	
11439	Judith DeMarsh	
11440	Ronnie Amato	
11441	Clarence Bolin	
11442	robert minnick	
11443	Barby Ulmer	
11444	Laurence Skirvin	
11445	Kathleen Keske	
11446	Connie Cranford	
11447	Elizabeth Beuthel	
11448	nancy schwartz	
11449	Bonnie Poland	
11450	Edward Birge	
11451	David Danesi	
11452	Cathie MD MPH	
11453	D'Anna Fortunato	
11454	Amy Vye	
11455	Virginia Hitchcock	
11456	Peter Borgen	
11457	dorinda kelley	
11458	Richard Schoonover	
11459	Francisco Velez Velez	
11460	Marissa Ferraro	
11461	Joel Johnson	
11462	Robert Lawrence	
11463	Jonathan Rayson	
11464	Deborah Fexis	
11465	John Zakrasek	
11466	Todd Nelson	
11467	Marc Meyer	
11468	Anthony Giordano	

Submission ID	Name	Organization Name
11469	Kate Robinson	
11470	Vivian Hernandez	
11471	Bruce Burdick	
11472	Blake Rothschild	
11473	Eric Whitman	
11474	Meliha Bisesar	
11475	Probyn Gregory	
11476	Stacey Ayala	
11477	Frankie Benoist	
11478	Sharon Lacy	
11479	Edgar Meyer	
11480	Michael Glasscock	
11481	Heidi Handsaker	
11482	Donovan Borge	
11483	Brian Dunn	
11484	Rev. Dr. John Brangenberg	
11485	Travis Miller	
11486	Gary Gover	
11487	Elizabeth Hartson	
11488	Erik Ortiz	
11489	Jackie Duba	
11490	Charles Macquarie	
11491	Jack McKinney	
11492	Ole Raadam	
11493	Patricia Dion	
11494	D.J. Lubonovich	
11495	D. Spaulding	
11496	Darcy Van Steelant	
11497	Jamie Harris	
11498	Kelly Hogue	
11499	Kevin Hughes	
11500	David Nuss	
11501	Jean Woppert	
11502	Robert Kelley	
11503	Martha Foppe	
11504	Alan Schenck	
11505	Danena Beuzeboc	
11506	Ruth DuValle	
11507	Cynthia Dimand	
11508	deborah green	
11509	DAVID MORSE	
11510	Barbara Bryce	
11511	Pamela Letourneau	
11512	Annette Keller	
11513	D C	
11514	Sherry Weiland	
11515	Nancy Marling	
11516	Cindy Iglesias	
11517	Macie Schriner	
11518	Debby MayberryJensen	
11519	Janet Wyatt	
11520	Daniel Fiore	
11521	Deborah Perlmutter	
11522	Patricia Harrison	

Submission ID	Name	Organization Name
11523	Karen Friends	
11524	rick Beville	
11525	Emory Collins	
11526	David Dragon	
11527	Susan Nichols	
11528	Jeffrey Pekrul	
11529	Kate Williams	
11530	Jessica Sherwood	
11531	Rochelle B. Ellison	
11532	George Flint	
11533	Donald Rendall	
11534	Tyler Graham	
11535	Elizabeth Watts	
11536	John AND Jean Fleming	
11537	Al Liebeskind	
11538	Elizabeth Jackson	
11539	Robert Kibrick	
11540	Mike Janecek	
11541	Rick Whitman	
11542	Andrew Hinz	
11543	David Farwell	
11544	June Weaver	
11545	Dan Kane	
11546	Kenneth Jobe	
11547	Kathleen Bovello	
11548	Dalila Dos-Santos	
11549	Helmut Platzer	
11550	Cindy Carter	
11551	Nathan Zerbe	
11552	ROBBIN LAPORTA	
11553	Kit Champlin	
11554	Marilyn Morgan	
11555	Brenda GILL	
11556	Marsha Kai	
11557	Pamela Garlett	
11558	Harvey Eisen PhD	
11559	Paul Reslink	
11560	Charlene Rush	
11561	Peter Winkler	
11562	Robert Peters	
11563	Michael Gutleber	
11564	Robert Thomson	
11565	Shirley Rivas	
11566	Leah Hunt	
11567	Joan Meierotto	
11568	James Marsden	
11569	Lee Gorman	
11570	Laszlo Martini	
11571	Richard Leigh	
11572	Linda Prostko	
11573	Daniel Fremgen	
11574	Melvin Taff	
11575	Alice Sedy	
11576	Beth Renwick	

Submission ID	Name	Organization Name
11577	Damien Fehrer	
11578	John Haresch	
11579	Carol Gray	
11580	Grace Hall	
11581	Emily Metz	
11582	Susanne Murray	
11583	Catherine Caron	
11584	Nolan Zane	
11585	bernardo alayza mujica	
11586	Alberto Acosta	
11587	Jim Hofman	
11588	Sonia Noemi Cross	
11589	Pat Fs	
11590	Dana Monroe	
11591	Alan Freed	
11592	Alison Page	
11593	Caroline B. Miller	
11594	Jeffrey Doolittle	
11595	Jane Shevtsov	
11596	Bonnie Helm	
11597	Adele Gilbert	
11598	Rolaine Wright	
11599	Robert Fanniff	
11600	Nelson Bible	
11601	Dan Volpatti	
11602	Douglas Kurtz	
11603	Mary Powell	
11604	Laura Sipes	
11605	Joseph Valko	
11606	Theresa Bradbury	
11607	Bruce Amsel	
11608	Mark Overs	
11609	Helen Mehl	
11610	Carrie Hildeman	
11611	Gerard Zimney	
11612	Jonathan Blick	
11613	Laureen Coughlin	
11614	Juan Radulovic	
11615	allison Alberts	
11616	Amber Eby	
11617	Kim Davis	
11618	Alan Cyr	
11619	Ron Krupp	
11620	Robert Souza	
11621	Thomas A Hannan	
11622	Pat Redner	
11623	Richard Pasichnyk	
11624	Joan Donovan	
11625	Paul Jones	
11626	Joyce Ciotti	
11627	Stephen Martin	
11628	Don Dieckmann	
11629	Kevin McAleer	
11630	Holly Cox	

Submission ID	Name	Organization Name
11631	Jaimee Stransky	
11632	Jacquelyn Cressy	
11633	Frank Gonzales Jr.	
11634	Ralph Redman	
11635	Craig Cureau	
11636	Chris Zerby	
11637	Ann Rossman	
11638	Terri Richmond	
11639	Terrie West	
11640	Jane Hobbs	
11641	Tom Walsh	
11642	Cheri Price	
11643	Sue Biederman	
11644	Mary Carlisle Ellis	
11645	S Whiteside	
11646	Paul Meyers	
11647	Susan Zimny	
11648	Eric Strid	
11649	Linda Kovitch	
11650	Allyn Howlett	
11651	John Brazier	
11652	Anonymous	
11653	Rachel King	
11654	Srijan Chakraborty	
11655	Thom Holmes	
11656	Craig Altemose	
11657	Lisa Diaz	
11658	Sarah Bostater	
11659	Robert Carroll	
11660	Howard Hassman	
11661	Jeremy Turner	
11662	Amy Mott	
11663	Denise Bunge	
11664	Nancy Johnson	
11665	Jim Petkiewicz	
11666	Margaret Petkiewicz	
11667	Anonymous	
11668	Larry Morningstar	
11669	Anonymous	
11670	Denise Scholz	
11671	James Johnson	
11672	Catherine Goodfellow	
11673	Felix Bizaoui	
11674	Pam Rensch	
11675	Pamela Joan Olsen	
11676	Stanley McDonald Jr.	
11677	Georgann Kovacovsky	
11678	doug franklin	
11679	Debbie Burroughs	
11680	Helen Cotton	
11681	Eric Bard	
11682	Julia Young	
11683	Amrita Burdick	
11684	Virgil Salzman	

Submission ID	Name	Organization Name
11685	James Kolb	
11686	Honey Mae Basye	
11687	Linda Kaley	
11688	Lem powers	
11689	Jerry Swanson	
11690	Edwin Jaros	
11691	Leona Bochantin	
11692	Betty Duggan	
11693	Thomas McDougal	
11694	Mark Sturnick	
11695	Sherri hodges	
11696	Laura Staples	
11697	YVONNE Christison	
11698	Sara Schundler	
11699	Linda Howie	
11700	Timothy Stinson	
11701	Wilfrid W Csaplar Jr	
11702	Michele Villeneuve	
11703	Deb Colotti	
11704	Claudette Ashley	
11705	Karen Kujala	
11706	CHRISTINE HUFF	
11707	Joan Chryst	
11708	George Plummer	
11709	Paul Wilcox	
11710	Joe McLaughlin	
11711	Sarah Brownrigg	
11712	S Lynn	
11713	Lora Leland	
11714	Joseph Humphrey	
11715	Bill Mawby	
11716	Rebecca Augustin	
11717	Jaclyn Hansbury	
11718	Guy Sferlazza	
11719	Anonymous	
11720	Joanne Steiner	
11721	Khue Tran	
11722	Michael Kotlik	
11723	Rosalie Murray	
11724	Carson Crites	
11725	Pamela Hosler	
11726	David Ashley	
11727	Sandra Clark	
11728	Kenneth Hall	
11729	Cheryl McGraw	
11730	Mark Daniels	
11731	Ed Fiedler	
11732	Gregory Chandler Jr	
11733	Noella Schum	
11734	Rhenda Price	
11735	Sherrill Futrell	
11736	RALPH PATTERSON	
11737	Fenton Kay	
11738	Peggy Moody	

Submission ID	Name	Organization Name
11739	Robi Kurth	
11740	Beth Marshall	
11741	Kade Ariani	
11742	Steve Oppenheim	
11743	Arthur Vliet	
11744	N. Schneider	
11745	Heide Hernandez	
11746	T Hamboyan Harrison	
11747	Diane Brower	
11748	Richard Watson	
11749	Mary Robinson	
11750	tom Swem	
11751	Edith Stone	
11752	Maggie Davidson	
11753	Peggy Alt	
11754	Juli Gage-Macdonald	
11755	Mary Zack	
11756	Blaise Boles	
11757	Matt Millsap	
11758	Terry Friedman	
11759	Margaret White	
11760	Iris Relis	
11761	Sharon Johnson	
11762	Hugh Moore	
11763	Janice Keiserman	
11764	Deborah Winograd	
11765	Peter Martin	
11766	David Downie	
11767	Heidi Hoffmann	
11768	Karen James	
11769	Emilie McVey	
11770	Jill Nicholas	
11771	John Heyneman	
11772	Hana Correa	
11773	Margaret Barrett	
11774	Joel Becker	
11775	Dwight Hughes	
11776	Michael Czuczak	
11777	Barbara Widger	
11778	Richard Bednarczyk	
11779	Lizabeth Simpson	
11780	Stephen Gilbert	
11781	Theresa Velazquez	
11782	Linda Hardy	
11783	William Nash	
11784	Barbara Metz	
11785	Amanda Hayes	
11786	Pamela MacBrayne	
11787	Kim Crawford	
11788	Zora Hocking	
11789	Linda Hall	
11790	Eve McClure	
11791	Brett O'Sullivan	
11792	Sue Feutz	

Submission ID	Name	Organization Name
11793	Sheila Bell	
11794	Gerald Kaiser	
11795	Gene Dongieux	
11796	David Reece	
11797	Llanda Richardson	
11798	Kathleen Quinn	
11799	P. Stacey Scott Durso	
11800	Stephanie Malady	
11801	Doreen Bucci	
11802	Tom Oken	
11803	Vickie Moore	
11804	Diana Jung	
11805	Gwendolyn Blaine	
11806	B. Conelley	
11807	Bruce Greene	
11808	Tempany Arbogast	
11809	CT Bross	
11810	Joe Minton	
11811	Gary LaMaster	
11812	Roderick Klinger	
11813	Elizabeth Meyer	
11814	John Faulkner	
11815	Phyllis Jenkins	
11816	Carmela Sudano	
11817	Catherine Macan	
11818	Sarah Hoover	
11819	Margaret Davitt	
11820	Laura Aymond	
11821	David Holland	
11822	Charles and Diana Quinn	
11823	Colleen Barrett	
11824	Sarah Shull	
11825	Gary Peacock	
11826	Brian McAllister	
11827	Karen Hansen	
11828	Alexandra Manning	
11829	Gary G. Friend II	
11830	Christine Aurilia	
11831	caephren mckenna	
11832	Jean McAvoy	
11833	Irving Sherman	
11834	Genesis Franco	
11835	David Boswell	
11836	Stephanie Garofalo	
11837	Stephanie Garofalo	
11838	Joseph Polansky	
11839	Agnes Kovacs	
11840	Burton Bryan	
11841	Karen Thomas	
11842	Ayesha Imam	
11843	Tracie BATson	
11844	Aisha Farhoud	
11845	H. Dennis Shumaker	
11846	John Haran	

Submission ID	Name	Organization Name
11847	Christopher Brooks	
11848	Tom Sunlake	
11849	Joe Potzka	
11850	Amanda Pinson	
11851	adrienne diprima	
11852	sam butler	
11853	Edith Griffin	
11854	Frank Orifici	
11855	Harold Lowenfels	
11856	Steve Roebuck	
11857	Matt Albee	
11858	Brenda Hill	
11859	Julie Wade	
11860	Colleen Lobel	
11861	Henry Morgen	
11862	Carol McDaniel	
11863	Giselle Piburn	
11864	Christopher Meinen	
11865	pat matz	
11866	Carmela Vignocchi	
11867	Maureen Kowsky	
11868	R Plourde	
11869	Michelle Hamilton	
11870	Nigel Attwell	
11871	Thomas Zadoyko	
11872	A Martin	
11873	Camille Herrick	
11877	Martha Stopa	
11878	Ed Heys	
11879	Joanne Zipay	
11880	Sabrina Eckles	
11881	Kathryn Stein	
11882	Savannah Young	
11883	Matthew Tarpley	
11884	Ms. Maria Celia Hernandez	
11885	Marya Parral	
11886	Brenda Carey	
11887	Kevin Blacker	
11888	Annapoorne Colangelo	
11889	Kevin Killeen JD	
11890	Mary B. Murphy	
11891	Frederik Brasz	
11892	JENNIFER Norman	
11893	Denis Sheehy	
11894	Richard Esten	
11895	James Buck Schall	
11896	Elaine Fischer	
11897	Kathy Olavarri	
11898	Kathryn Kirkhuff	
11899	Dennis Nelson	
11900	Kathleen Fox	
11901	Sherry Truss	
11902	Geralyn Farwell	
11903	Sean Lagonegro	

Submission ID	Name	Organization Name
11904	Arthur Yeske	
11905	Leigh Hill	
11906	Mary Eastman	
11907	Jack Binder	
11908	Hildegarde Evans	
11909	A. McGarry	
11910	Renae McKeon	
11911	Barbara Newman	
11912	Mary Poor	
11913	Angelina Saucedo	
11914	Kimberly Wick	
11915	Mark Ambrus	
11916	Dr. Victoria Gardner	
11917	Patrick Fleming	
11918	Tyler Briggs	
11919	Eric Max	
11921	Mariann Brough	
11922	George Willis	
11923	Stacie Charlebois	
11924	Romy Overstreet	
11925	Cheryl Coen	
11926	Julia Fujioka	
11927	Eugene Jura	
11928	Kara Harms	
11929	"Mary Anne Whelan, MD"	
11930	Janet Roemer	
11931	Carol Ng	
11932	Wesley Meeker	
11933	Wouter Vermeersch	
11934	Pete Stuller	
11935	Liane Yochum	
11936	Judy and Michael White	
11937	Sue-Ann Schuldt	
11938	James Volkomer	
11939	Michael Singer	
11940	William Horne	
11941	Carol Hautau	
11942	Sara Graziosa	
11943	William Gordon	
11944	Ryan McAllister	
11945	Tim Timmermann	USEPA
11946	Deanne Lewis	
11947	carolyn rand	
11948	Robert Havrilla	
11949	Margean Kastner	
11950	Nancy Chismar	
11951	Raleigh Brecht	
11952	Thomas Bennett	
11953	Holly McNamara	Town of Somerset, MA
11954	Stanley S. Hazen	
11955	Sarah Meyers	
11956	Tom McNichol	
11957	Alicia Knoblock	
11958	Joan Lesikin	

Submission ID	Name	Organization Name
11959	Christopher Ferrigine	
11960	Michael Richmond	
11961	Arnold Strang	
11962	John Haran	
11963	Nancy Perry	
11964	Robin Goergner	
11965	Mary Williams	
11966	Wayne Carson	
11967	Leonor Molina	
11968	"Norval A. Stanley, III"	Bergies Seafood Inc., F/V Sovereign Star, Seven Seas, and Kathy & Jackie
11969	Wendy Lewis	
11970	Julia Love	
11971	Johannes Raatz	
11972	Rita Davis	
11973	Emily Reichert	Greentown Labs
11974	Damien Condo	
11975	Diana Page	
11976	Charles Flammer	
11977	Pranab Banerjee	
11978	Andreia Shotwell	
11979	Carole Forman	
11980	Kathy Wise	
11981	Dianne Entwistle	
11982	Damon Copeland	
11983	D S	
11984	John Rogers	
11985	Kim Smith	
11986	Jane Marquet	
11987	Richard Newmark	
11988	Scott Grinthal	
11989	Rebecca Wykoff	
11990	Michelle Graves	
11991	Rob Bodner	
11992	Peter Joyce	
11993	Shirley Fukuhara	
11994	Zoie Zanoni	
11995	Sherry McNeil	
11996	Lucia Kucinskaskas	
11997	John Erben	
11998	Janet Van Vleck	
11999	Sarah Klain	
12000	sheila ganch	
12001	Amy Hochberg	
12002	Sarah Eisenberg	
12003	Deborah Gudzevich	
12004	justine cooper	
12005	Susan Beetle	
12006	Heidi Burgess	
12007	Don Mullen	
12008	C M	
12009	Donna Noyes	
12010	James Trembulak	
12011	Linnea Fronce	

Submission ID	Name	Organization Name
12012	Helen Duquette	
12013	Nick Hyer	
12014	Brunilda Betancourt	
12015	Tanya Piker	
12016	omar beqaj	
12017	Joel Gates	
12018	Eric Johnson	
12019	Richard Delaney	Cape Cod Climate Change Collaborative
12020	e b	
12021	Gretchen Patey	
12022	Robin Goergner	
12023	B. Roux	
12024	Karina Andreasen	
12025	Kai Salem	Green Energy Consumers Alliance
12026	Karen Koonan	
12027	Robert Sykes	
12028	Antonio Caniano	
12029	Rebecca Lambert	
12030	Michael Krumper	
12031	Veronica Crane-Lindsey	
12032	Jeff Mac Donald	
12033	Gary McDermott	
12034	Sam Engler	
12035	Sandy Tosi	
12036	Harry Schmerl	
12037	Mary McGuire	
12038	Cam Wolff	
12039	cheri riznyk	
12040	Mary Ellen Christman	
12041	Marisa Desautel	The Rhode Island Fishermen's Advisory Board
12042	Capt.paul Eidman	
12043	Joel Merriman	American Bird Conservancy
12044	Amy Sedlak	
12045	Anonymous	
12046	Sylvia Ewerts	
12047	Kenneth Keshecki	
12048	Brandon Stieve	
12049	Grace Morrissey	
12050	R Wuerch	
12051	Sylvie Wellhausen	
12052	kayla wuerch	
12053	John Cotham	
12054	Larry Huber	
12055	Dan Blakey	
12056	Susan Lemont	
12057	Bryan Johns	
12058	Nicolas Williams	
12059	Fred Akers	
12060	ELEANOR TOTH	
12061	Kimberly and Michael Hoover	
12062	James Michael 'Mike' Henderson	
12063	Miles Newton	
12064	Colleen Slanina	
12065	Lenore S. Blum	

Submission ID	Name	Organization Name
12066	David Brunetti	
12067	Anne Lindell	
12068	Peter Spool	
12069	Anne Lindell	
12070	R Odom	
12071	Susan Wald	
12072	Peggy Carlson	
12073	Matthew Smith	
12074	Allison Kiser	
12075	Robert Williams	
12076	Tim Lebida	
12077	Scot Westphal	
12078	Deborah Hewlett	
12079	Nathan Harling	
12080	Meredith Dooley	
12081	Sarah Poirier	
12082	Sarah Suhich	
12083	Kevin Burden	
12084	Melissa Hoving	
12085	Aaron Moulin	
12086	Lindsey Walker	
12087	Alex Youngs	
12088	Jeffrey Ridge	
12089	Elliot Flute	
12090	Susan Rack	
12091	David McAlaster	
12092	Robin Schachat	
12093	L. Ladd	
12094	Hunter Boswell	
12095	Linda Bassett	
12096	Naomi Lehman	
12097	Percy Hicks-Severn	
12098	Arci Jimenez	
12099	pam doran	
12100	Laura Haule	
12101	Bill Gorham	
12102	Sharon Shinas	
12103	Helen Greer	
12104	Anthony Calascibetta	
12105	Matthew Barre	
12106	Kerry Dietz	
12107	Ad Naka	
12108	Viktoria Norberg	
12109	Mike O'Connell	
12110	Matt Silverstein	
12111	Kathy Casiello	
12112	Tim Hoy	
12113	Paul Scott	
12114	Jonathan Seldin	
12115	Ryan Walston	
12116	Steven Iversen	
12117	Cynthia Bernett	
12118	Tansy Rhein	
12119	Rosemarie Pace	

Submission ID	Name	Organization Name
12120	Eugene Pometto	
12121	Sheila Walsh	
12122	Jeffrey Richard	
12123	Andrew Jones	
12124	Kandice Bilisoly	
12125	Michael and Barbara Hill	
12126	Shannon Keifner	
12127	Donna Raineri	
12128	Michael Bilecki	
12129	Candace Volz	
12130	Satya Vayu	
12131	Stephen Strauss	
12132	Stephanie Guth	
12133	Joseph Wathen	
12134	John A Satterwhite	
12135	Christy Ogilvie McCreary	
12136	Amy Anderson	
12137	Eileen Levin	
12138	Ronald Olszewski	
12139	Ann Levine	
12140	Jaclyn Behringer	
12141	Michael Siptroth	
12142	JoAnn Pedersen	
12143	Judy Bochner	
12144	Randal Arthur	
12145	Anonymous	
12146	Lynda Alvarez	
12147	Jacqueline Wolfstein	
12148	Jeff Brook	
12149	Lesley Hunt	
12150	Bill Christie	
12151	Debi Chernak	
12152	M P	
12153	p elle	
12154	Jacqui Skill	
12155	Leslie Young	
12156	Allan Fix	
12157	Michael Kolezar	
12158	Jeremy Carpenter	
12159	Patrice Wallace	
12160	Baysan Tulu	
12161	Natasha Hopkins	
12162	Danielle deConge	
12163	Jay Roth	
12164	Timothy Flewelling	
12165	Melanie Odette	
12166	Eric Boulet	
12167	John Satterwhite	
12168	James Balder	
12169	Pat Jordan	
12170	Mary Ann Viveros	
12171	Susan Feller	
12172	Rebecca Berlant	
12173	Jennifer Benefit	

Submission ID	Name	Organization Name
12174	Anne Harbut	
12175	Jack Carrick	
12176	Danielle Norcross	
12177	Jim Kellett	
12178	Lisa Brenskelle	
12179	Christine Coffin	
12180	Ron Nosek	
12181	Anonymous	Hinckley Allen & Snyder, LLP
12182	Susan Harris	
12183	Robin Main	
12184	Anna Marie Rhodes	
12185	Laurel Ostrow	
12186	Benjamin Roberts	
12187	Robert Petrie	
12188	Ian Hodder	Geoquip Marine Operations AG
12189	Rodney Avila	
12190	Michael Egenton	New Jersey Chamber of Commerce
12191	Michael Megill	
12192	Robert Lutman	
12193	Liz Thomas	
12194	J Russo	
12195	Diana Turner	
12196	Jon Landenburger	
12197	Deb Horan	
12198	Susanne Paulovic	
12199	Anonymous	
12200	Ginger Lee Pierce	
12201	Charles Courant	
12202	Capt. William Grimm	Inlet Seafood Inc
12203	Francesca Socorro	
12204	Lee Connor	
12205	Angie Morrissey	
12206	Jean Heaps	
12207	Chelsea Pascoe	
12208	Benjamin Waldron	
12209	Jody Lally	
12210	Steven G	
12211	Ruba Leech	
12212	Alex Babbín	WindServe Marine
12213	Linda Lee	
12214	Vincent Cupola	
12215	Charles Jones	
12216	chris noyes	
12217	Carolina Moreno	
12218	Cheryl Militello	
12219	Linda Neil	
12220	Don Keeran	Association to Preserve Cape Cod
12221	Eric Rosina	
12222	Steven Sawhill	DNV GL USA, Inc.
12223	Earle Chapels	
12224	Judith Goldman	
12225	Sarah Conlin	
12226	Tad Morris	
12227	Keeth Fiocco	

Submission ID	Name	Organization Name
12228	Chris Huetteman	
12229	Brandon Burke	Business Network for Offshore Wind
12230	Karen Melamed Smith	
12231	Gordon Starr	
12232	Mary Jane Rhodes	
12233	dee preslik	
12234	anne baldwin	
12235	Mary Tober	
12236	Elena Schaef	
12237	Mark Rousseau	
12238	Sue Maxam	
12239	Christopher Waterson	
12240	Beatrice Phear	
12241	Robert Hyde	
12242	Hilary Fagan	
12243	Bryan Mornaghi	
12244	DeLyna Hadgu	
12245	PATRIZIA ZITA	
12246	Rita Edwards	
12247	Kathy Goodwin	
12248	Enzo Bard	
12249	Donald Dunn	
12250	Harley Stevens	
12251	Terence McGean	Town of Ocean City
12252	Wendell Yee	
12253	John Morrissey	
12254	Paul Leo	
12255	Anonymous	
12256	Nikki Kateman	
12257	Jamie Pershing	
12258	Jeremy McDiarmid	
12259	Liisa May	
12260	Cassandra Klewicki	
12261	John Durso	
12262	Seth Snapp	
12263	Erica Rechner	
12264	Lloyd Dounn	
12265	Ryan Smart	
12266	Erica Rechner	
12267	William Hennessey	
12268	Michael Loreto	
12269	KEVIN PETERMAN	
12270	Louis monarchio	
12271	Selina Durio	
12272	George Whitridge	
12273	Anthony Guerrero	
12274	Sarah Ferriell	
12275	Anonymous	
12276	Patrick Pellerin	
12277	Zach Skelton	
12278	Nora Lewis	
12279	Joseph Ippolito	
12280	David Keaton	
12281	Rob Hannemann	

Submission ID	Name	Organization Name
12282	Maureen Quinn-Dupont	
12283	lou gottlieb	
12284	Michael Braid	
12285	Duncan Sokolowski	
12286	Christian Perez	
12287	Jane Dye	
12288	Hugh Roarty	
12289	Joshua Lies	
12290	Gerald Muffoletto	
12291	Katie O'Neal	
12292	Lisa Broughton	Suffolk County, NY
12293	Peter Straub	
12294	Thomas Sproul	
12295	Monica Diaz	
12296	Syd Griffin	
12297	Joseph Montalbano	
12298	Mark Grossman	
12299	MARIA PAUL	
12300	Laura Tugwell	
12301	Robert Jordan	
12302	Laine Lubar	
12303	John Asvestas	
12304	Dana Maxwell	
12305	Alex Lawton	
12306	Michael Hanebutt	
12307	Chris Corney	
12308	Clayton Jones	
12309	Andrea Wasserman	
12310	Nicholas Keshecki	
12311	Kenneth Jacobsen	
12312	Paula Brewer	
12313	Brian Boeshore	
12314	Joe Martens	New York Offshore Wind Alliance
12315	John Shepard	
12316	Denis Bradley	
12317	Michele romano	
12318	Mike Baumann	
12319	David Goldberg	
12320	Eloise Linger	
12321	John Hyland	
12322	Virgine Lawinger	
12323	Laura Sokoloski	
12324	Anonymous	
12325	Robert Holst	
12326	Lauramae Cocchi	
12327	Anonymous	
12328	John Primrose	
12329	John Woodard	
12330	Martha Wood	
12331	Janet Powers	
12332	Carrie Peckar	
12333	John Kipp	
12334	Kristin Agresta	
12335	Joel Lopez	

Submission ID	Name	Organization Name
12336	Edward Cosgriff	
12337	Liz Gostev	
12338	Douglas Sullivan	
12339	Cynthia Smith	
12340	Joyce Chavez	
12341	Diane Peacock	
12342	Craig Bachmann	
12343	Kimberly McConkey	
12344	Brian Clarke	
12345	William Higgins	
12346	ellen sue jacobson	
12347	Bill Pope	
12348	Nicholas Andersen	
12349	Marcia Young	
12350	Rich Poulos	
12351	Brian Nigro	
12352	Harold Myers	
12353	Jack Russo	
12354	Carlos Jose	
12355	Jeffrey Nosbaum	
12356	Ryan Smart	
12357	Kevin Brown	
12358	Nick Hoh	
12359	Elaine Messineo	
12360	Joe Gariola	
12361	Matt Reola	
12362	Laura Colston	
12363	Andrew Baird	
12364	James Dawson	
12365	Anonymous	
12366	Nick Sgroi	
12367	Ben Tillman	
12368	Edward Egan	
12369	Michael Linkowski	
12370	James Hillenbrand	
12371	Nikolaos Aspras	
12372	Anonymous	
12373	Karlos Amaro	
12374	james williams	
12375	Alexander Molt	
12376	Inneshia Hart	
12377	Barbara Calabro	
12378	Edison Rocco	
12379	Fred W	
12380	Elaine Connors	
12381	Anya Rey	
12382	Gilberto Constantinez	
12383	Scott Haberstroh	
12384	Anonymous	
12385	ROBERT MORANO	
12386	Robert Rutherford	
12387	Anonymous	
12388	Louis Betro	
12389	Hal Trufan	

Submission ID	Name	Organization Name
12390	Sandy Neese	
12391	Anonymous	
12392	ERIC DIEZ	
12393	Pamela A. Lowry	
12394	Anonymous	
12395	Caitlin Ramos	
12396	Suellen Carroll	
12397	Chad Bunch	
12398	Peter McKnight	
12399	Don H	
12400	Stephanie McFadden	
12401	Ida Kokal	
12402	Richard Bartkowicz	
12403	Theresa Donatiello Neidich	
12404	Richard Ragonese	
12405	Jr Russ	
12406	Dorelle Rawlings	
12407	Joseph Dangelo	
12408	Matthew Dugan	
12409	Bob Fischella	
12410	Victoria Esserry	
12411	Ann C McGill	
12412	Peter Kahigian	
12413	Linda Gazzola	
12414	Lurlie Edgecomb	
12415	Erica Griffin	
12416	Annika Swenson	
12417	Tika Bordelon	
12418	Linda Doherty	
12419	Misty Hay	
12420	Bryan Duncan	
12421	Eva Norton	
12422	Khalid Simjee	
12423	James Fitzgerald	
12424	George Furman	
12425	Walter Beck	
12426	DAVE CARR	
12427	Bryan Brady	
12428	John Haran	
12429	Janice Banks	
12430	janine simmons	
12431	Francis C. Hynds Hynds	
12432	Stephen Collins	
12433	Patrick Hussey	
12434	Suzan Woychuk	
12435	Jill Goodell	
12436	Joseph Engel	
12437	Bill Wall	
12438	Chris Rechner	
12439	Robert Nobrega	
12440	Thomas McCann	
12441	Thomas McCann	
12442	Mary Mark	
12443	Franca Floro	

Submission ID	Name	Organization Name
12444	John Hutson	
12445	Melissa Nelson	
12446	Matthew McSpedon	
12447	David Nickerson	
12448	Connie Lim	
12449	Nikki Wojtalik	
12450	Rich Kenney	
12451	Andrew Long	
12452	Bill Mcintosh	
12453	Mary O'Rourke	
12454	John Carr	
12455	Anonymous	
12456	Anonymous	
12457	daniele dumais	
12458	Amy Bush	
12459	Jon Wood	
12460	Dennis McSpedon	
12461	neil d'auria	
12462	Matthew Slavens	
12463	Rich Harinsky	
12464	Anonymous	
12465	Terri Stromberg	
12466	Vincenzo Errico	
12467	Steve puglisi	
12468	Jeff Ricketts	
12469	Robert Roesler	
12470	Carol Castellaneta	
12471	Anonymous	
12472	Randy Hammer	
12473	Mark Huang	
12474	Jerry Keenan	
12475	D. Badger Kopnitsky	
12476	Mark Klugiewicz	
12477	Anonymous	
12478	Roberta Richardson	
12479	Lucy Rota Keller	
12480	Brian Cardwell	
12481	Emily Harville	
12482	Brian McGee	
12483	Gerard Scully	
12484	David Sprintzen	
12485	Eric Chan	
12486	John Roughan	
12487	Carlos diaz	
12488	Diane Cantave	
12489	Gary Baxel	
12490	Ryan Hunt	
12491	David Diamond	
12492	Melissa Reisland	
12493	Eric Morris	
12494	Paul Braun	
12495	Rebecca Shedd	
12496	Melody Eyres	
12497	Jamie Buck	

Submission ID	Name	Organization Name
12498	Margaret Doherty	
12499	Adrien Logsdon	
12500	Ross Flanagan	
12501	Stephan Barea	
12502	Daniel Mohammed	
12503	Christopher Brown	
12504	Pythagore Providence	
12505	Joseph Battelli	
12506	Michael Cosares	
12507	Michael Bruinooge	
12508	Ian Satin	
12509	Tyler Casolaro	
12510	Chris Dehnert	
12511	Joseph Caporale	
12512	Matthew Treadwell	
12513	Daniel Caceres	
12514	Matt West	
12515	Anastasiya Grishkevich	
12516	Ammar Sherwani	
12517	Laurent Rappaport	
12518	Anthony Amoretti	
12519	william hardwick	
12520	Christopher DeGasperis	
12521	D. A. Bozyk	
12522	Junior Soto	
12523	Leif Andersen	
12524	Alex Caban	
12525	Matthew Lahita	
12526	Jon Tobin	
12527	Memesha Davis	
12528	Joseph Catania	
12529	Anthony Royster	
12530	Trevor Wilson	
12531	Michael Duran	
12532	Navid Chin	
12533	Terence McAnuff	
12534	Alfredo Manno	
12535	Derek Speziale	
12536	Francis Calle	
12537	Riley Leder	
12538	Hogan Gilbert	
12539	Jeremy Rodgers	
12540	Joseph Rau	
12541	Brandon Ghany	
12542	Casey Raub	
12543	Viktor Jancula	
12544	John Murphy	
12545	Christian Mejia	
12546	Hector Marzan	
12547	Alex Fernan	
12548	Thomas Roumbakos	
12549	Troy Wegenaar	
12550	Mark Carrasso	
12551	Thomas Doyle	

Submission ID	Name	Organization Name
12552	Linda Bradley	
12553	Victorio Blanco	
12554	Jamie Carr	
12555	Thomas Buzzell	
12556	Sunwoo Park	
12557	Steven Mesa	
12558	Edward Thompson	
12559	Michael Georgeou	
12560	Ryan Hellman	
12561	Thomas Morawski	
12562	Alexander Elman	
12563	Eric Feldhaus	
12564	James Kowalewski	
12565	John Newsom	
12566	Nicholas Gennuso	
12567	Javier Rivera	
12568	Salvatore mennella	
12569	Kyle Dietrich	
12570	Ryan Crawley	
12571	Trevor Smith	
12572	Joan Hudson	
12573	Kevin Hayes	
12574	Mark Thomas	
12575	Michael Kolenda	
12576	Jonathan Bernius	
12577	Tyler Sherman	
12578	Vincent Novak	
12579	Thomas Shammah	
12580	Troy Wilson	
12581	Richard Gooler	
12582	Aleshandra Fernandes	
12583	HAROLD LEGERME	
12584	Timothy Howard	
12585	Diana Stafford	
12586	Dylan Palminteri	
12587	Daniel Schumacher	
12588	Adam Dinardo	
12589	John Presta	
12590	Earl Crumpe	
12591	Michael White	
12592	Sean O'Malley	
12593	Vincent Decapite	
12594	Anonymous Mahon	
12595	Matthew Anonymous	
12596	Karen Kahn	
12597	Gavin Anonymous	
12598	Zachary Lang	
12599	Eugene Wallace	
12600	Arlo Bodden	
12601	James Drago	
12602	terry crookston	
12603	Anonymous	
12604	Matthew Quirk	
12605	Brian Kusuma	

Submission ID	Name	Organization Name
12606	William Lisoski	
12607	Damian Duran	
12608	Ed Toron	
12609	virginia mcgowan	
12610	Catherine Starkweather	
12611	Tracy Lucas	
12612	Randy Nies	
12613	sean donovan	
12614	Lisa Pope	
12615	Charles Davis	
12616	Peter Maloney	
12617	Katharine Gibson	
12618	Mimi Sandeen	
12619	Elliott Trahan	
12620	Matthew Ruban	
12621	Carol Polak	
12622	Cher Michel	
12623	Hildy Meyers	
12624	Matt Warren	
12625	Marcos Reinoso	
12626	Conrad Lazare	
12627	Andres Virguez	
12628	Mary Eiben	
12629	Sally Boisseau	
12630	Hayley Somers	
12631	Connor McManus	
12632	Kevin Lyons	
12633	George Regina	
12634	Anonymous	
12635	Anthony Migliaro	
12636	Mark Vitale	
12637	Sarah Painter	
12638	Annemarie Meyer	
12639	ERIN Vaughan	
12640	John DiTusa	
12641	Dominic Soreco	
12642	Ryan McSweeney	
12643	Anna Carver-Gay	
12644	Matthew Corliss	
12645	Joseph Carr	
12646	James Nichols	
12647	Mathew Pinto	
12648	Matthew Anderson	
12649	Connie Mae Clark	
12650	Lauren Richie	
12651	Marlene Faucher	
12652	Tristan Bredwood	
12653	Justin Ottrando	
12654	Kyle Wahl	
12655	Corinna Duncan	
12656	Alexander Dinell	
12657	Guy Verderosa	
12658	Alice Walker	
12659	Marsha Looney	

Submission ID	Name	Organization Name
12660	Derek Richardson	
12661	Anonymous	
12662	Efoe Touvor	
12663	Scott Washburn	
12664	Sue Alexander	
12665	Gloria-Jean Berberich	
12666	Krish Sharman	
12667	Steve Keil	
12668	Kate Anderson	
12669	Noel Atherton	
12670	Timothy Marshall	
12671	Gregory Leclair	
12672	Maynard Clark	
12673	William Bey	
12674	Michael Chiovaro	
12675	Richard Koubek	
12676	Matthew Nelson	
12677	Julia Cole	
12678	Joel Herman	
12679	Brian Noble	
12680	Stephanie Noble	
12681	William Higgins sr	
12682	Justin Delgado	
12683	Blaine Burgstrom	
12684	James Versocki	
12685	Terrance Love	
12686	S. Nam	
12687	Michele Bazan	
12688	Aiden Dillard	
12689	Sean Breslin	
12690	Thomas Santoro	
12691	James Magrone	
12692	Carlo Huston	
12693	John Heyder	
12694	Eddie Ramirez	
12695	Christopher Walker	
12696	Philip Grello	
12697	Nicholas Rhodes	
12698	Douglas Woerner	
12699	Aaron Ott	
12700	John Niesen	
12701	Jerry Laricchiuta	
12702	Anonymous	
12703	Michael Cohill	
12704	Richard Grant	
12705	David Georgeson	
12706	David Kanter	
12707	Michael Boucher	
12708	Zach Wade	
12709	Nancy Beals	
12710	Bev Vanderstar	
12711	Gerard Dhooge	
12712	John McCarthy	
12713	Justin Hester	

Submission ID	Name	Organization Name
12714	Gino Titone	
12715	Thomas M Allen	
12716	Joachim Godfrey	
12717	Craig Stout	
12718	Guy Luerssen	
12719	Alex Zozulin	
12720	thomas yates	
12721	Daniel Webb	
12722	Robert Ziegel	
12723	jimmie williams	
12724	Pamela Crouse-Haas	
12725	sean burns	
12726	Patricia Auer	
12727	John Humphries	
12728	K'shaun Thompson	
12729	daniel seely	
12730	Salvatore Commisso	
12731	Lanny Dellinger	
12732	Paul Baek	
12733	Anonymous	
12734	Robert Erikson	
12735	Anonymous	
12736	Ronald Verderber	
12737	David Medrano	
12738	Deborah Cunningham	
12739	Mathias Dutil	
12740	Kate Sims	
12741	John Barry	
12743	Ian Tes	
12744	Ed Burbes	
12745	Dat Tran	
12746	tom oppelt	
12747	Jeff Deischer	
12748	R. Paul Maidment	
12749	William Bridwell	
12750	Scott McCreery	
12751	Erin McDonald CVT	
12752	teri Bradley	
12753	Shelly Peterson	
12754	John Haran	
12755	Paul Forsberg	
12756	Elizabeth Mooney	
12757	Paul Engel	
12758	David Vayo	
12759	denis mahoney	
12760	Monica Romani	
12761	Constance Ruby	
12762	Richard Scoles	
12763	Donna Rusinek	
12764	Pablo Bobe	
12765	Scott Kampschaefer	
12766	ML Tarolli	
12767	Chris Sherman	
12768	Luk Saljanin	

Submission ID	Name	Organization Name
12769	richard ranieri	
12770	Arthur Cruz	
12771	Harry and Jill Brownfield	
12772	Joe Schmit	
12773	Bruce French	
12774	Cecile Adams	
12775	Margaret Schultz	
12776	Dirk Faegre	
12777	Wally Schulingkamp	
12778	Benny Vaccara	
12779	Joan S Leland	
12780	Kevin Ryan	
12781	Jourdan Reis	
12782	Grant Doerrman	
12783	James Freeman	
12784	Anonymous	
12785	Courtney Worrall	
12786	Mitzi DuBois	
12787	David McPeek	
12788	Larry Cohen	
12789	Keith Neuschwanter	
12790	Anonymous	
12791	Elizabeth Cutter	
12792	Mason Deaver	
12793	David Hofer	
12794	Wayne Jefferson	
12795	Edward Barrett	
12796	Meredith Gibson	
12797	Michael Berluti	
12798	Jonathan Berenson	
12799	Jerome White	
12800	Leslie OShaughnessy	
12801	Sean Murphy	
12802	Stephen Chevel	
12803	Anonymous	
12804	Adrian Vargas	
12805	Eric Myra	
12806	Mark Persons	
12807	Amanda Jones	
12808	Madigan Kim	
12809	Esteban Esquivel	
12810	Daren McMillian	
12811	Christine Muller	
12812	Scott Jackson	
12813	Cristian Kim	
12814	Maciej Stankiewicz	
12815	Ryan Gilbride	
12816	Suzanne Kunstman	
12817	Rita Webber	
12818	Anonymous	
12819	LAWENCE DANIELL	
12820	Philip Francisco	
12821	Michael Duffy	
12822	Ashutosh Chandak	

Submission ID	Name	Organization Name
12823	Michael Collins	
12824	Reva Thompson	
12825	Jay Aluisio	
12826	Anthony Larkin	
12827	George Gustafson	
12828	A Paul	
12829	Bert Newsom	
12830	Sara Welch	
12831	Anonymous	
12832	Louis Bennett	
12833	William Nakshian	
12834	Danielle Raymond	
12835	Michelle Adcock	
12836	Pankaj Lal	Clean Energy and Sustainability Analytics Center, Montclair State University
12837	Gabrielle Byrd	
12838	Brooke S	
12839	David Keip	
12840	James Tatum	
12841	Anonymous	
12842	Linda Padgett	
12843	Diego Paixao	
12844	Matthew Riegert	
12845	Anonymous	
12846	Matthew Gleason	
12847	Ani Halasz	
12848	Obrien Ed	
12849	Matthew Davis	
12851	Sarah Ferguson	
12852	Michael Pasquaretta	
12854	Robert O'Neal	
12855	Johan Bustos	
12856	Nathan Mapes	
12857	Megumi Ishii	
12858	Anthony Speelman	
12859	Kiley Cargill	
12860	Tim McCarthy	
12861	Anonymous	
12862	Timothy McCarthy	
12863	Cynthia Marine	
12864	Barbara Hafner	
12865	Joseph Windwalker	
12866	Richard Dabrowski	
12867	Stacey McCarthy	
12868	Arthur Regensburger	
12869	Michael Passaretti	
12870	sean meehan	
12871	Farzam Maleki	
12872	louis sanchez	
12873	Leslie Rose	
12874	David R Wilcox	
12875	Vicky Harris	
12876	Martina Muller	
12877	Andre Zimnik	

Submission ID	Name	Organization Name
12878	Daniel Boyd	
12879	Steven Capolino	
12880	Joseph Gilbert	
12881	Douglas Smith	
12882	Jeff Gardner	
12883	Mark Ojakian	
12884	E Gotjen	
12885	Alexander Matathia	
12886	Anonymous	
12887	Anonymous	
12888	Panagis Papadatos	
12889	Carolyn Kube	
12890	Mariah Dignan	
12891	Emily Demmin	
12892	Jonathan Bailey	Flag Management Service
12893	Kate Roy	
12894	Michael Martell	
12895	Bryan Sanderson	
12896	Christopher Scranton	
12897	Renee Seward	
12898	Anonymous	
12899	Mark Neiswender	
12900	Douglas Nelson	
12901	Elizabeth Maldonado	
12902	Joseph Perdichizzi	
12903	Tiffany-Marie Austin	
12904	Robert Catell	
12905	Shaquiel Lazare	
12906	Jack Kiryk	
12907	Robert Mearini	
12908	Vicki Clark	Cape May County Chamber
12909	John Haran	
12910	Brian Young	
12911	KRIS LAGRANGE	
12912	Mark Mincher	
12913	Louis L. Petrizzo	Suffolk County Community College
12914	Thomas Halstead	
12915	Adrienne Esposito	Citizens Campaign for the Environment
12916	janine simmons	
12917	D. Backer	
12918	Samantha Turetsky	
12919	Josh Diedrich	WindServe Marine, LLC
12920	Ashley Petersen	
12921	Jamel Thomas	
12922	Jim Hagerty	
12923	Katherine Klausmeier	MD State Senate
12924	Kole Nicaj	
12925	Susannah Hatch	Various New England Businesses and Institutions
12926	sarah leinbach	
12927	sarah leinbach	
12928	Johanna Held	
12929	philip rugile	
12930	Thomas Melone	ALLCO RENEWABLE ENERGY LIMITED, ALLCO FINANCE LIMITED, et al

Submission ID	Name	Organization Name
12931	Eugene Curry	Cape Cod Technology Council, Inc.
12932	Tom Cavanagh	
12933	Mary Anne Trasciatti	
12934	Jack Cammarota	
12935	Peter Pease	
12936	Michael Welsh	
12937	Tony MacDonald	
12938	Maureen Murphy	
12940	Duane Gates	
12941	SERGIO BERGUNO	WINDAR RENOVABLES SL
12942	Anonymous	
12943	Brian Smith	
12944	Michael Gendron	
12945	Lauren Howerton	
12946	Michael Roberts	
12947	Brian Smith	
12948	Matthew Cohen	Long Island Association
12949	Nancy McRae	
12950	karl button	
12951	Al Christopher	Commonwealth of Virginia, Division of Offshore Wind
12952	Robert Micallef	
12953	Alexander Elvin	Martha's Vineyard Commission
12954	Ramon Rosquete	
12955	Joey Nedbal	
12956	Vaidehi Bhardwaj	
12957	Ronald Dunn	
12958	Katherine Mamed	
12959	Tom Vinson	
12960	Thomas Nies	NEFMC and MAFMC
12961	Clifford Beatty	
12962	Adam Komorowski	
12963	William Sproule	Eastern Atlantic States Regional Council of Carpenters
12964	Hanna Ring	
12965	Raymond Kasmark	
12966	Walter Cruickshank	
12967	Charles Adey	
12968	Hillary Bright	
12969	Lars Muck	
12970	Kevin Grady	
12971	Michel Kurstjens	
12972	mark phillips	
12973	Richard England	The National Ocean Industries Association
12974	Flavio Parpinelli	
12975	Michael Melville	
12976	Michael DAmico	
12977	Jordan Christensen	
12978	George Schneeloch	
12979	Alison Mullan-Stout	
12980	William Kee	
12981	Dan walcott	
12982	Katie Almeida	
12983	S Jacky	
12992	Allen Burgenson	
12995	WILLIAM KEE	

Submission ID	Name	Organization Name
12996	Catherine Macken	
12998	Valerie Virgona	
12999	Howard D Belote	
13000	Maurice Samuels	
13001	Theresa Azar	
13002	Paula Major	Mainstream Renewable Power
13003	Richard Hendrick	
13005	Lowely Cheung	
13006	Sarah Rippel	
13007	Kayla Thompson	
13008	David Hubbard	
13009	Guy Simmons`	
13010	Christopher Quinn	American Offshore Wind Coalition
13011	Katelyn Hill	
13012	John DarrochMannix	
13013	David Boudier	
13014	Adam Hurwitz	
13015	Daniel Wolf	
13016	Adrianna Antigiovanni	
13017	Haldane Davies	Consumer Energy Alliance
13018	PATRICIA GOZEMBA	SAFE (Salem Alliance for the Environment)
13019	Jennifer Flood	Mayflower Wind Energy LLC
13020	Jessica Lehrer	
13021	Anonymous	New York State
13022	Jason Cabral	
13023	Sylvia Ren	
13024	Matthew Palmer	
13025	Becky Crumbo	
13026	Thomas Bell	
13027	Lindsay Pressman	
13028	Michael Graziosi	
13029	RI Attorney General Peter F. Neronha	Rhode Island Attorney General
13030	Neil Brown	
13031	Peter Barnes	
13032	Lauren Belmonte	
13033	Stan Franzeen	
13034	Jeff Cohen	Salem Sustainability Energy & Resiliency Committee
13035	Alexandria Bruzzi	
13036	Hillary Aidun	Win with South Fork Wind
13037	Jackie Adams	
13038	PATRICIA GOZEMBA	
13039	Matthew Beaton	
13040	Anthony Garcia	
13041	Barbara Gaba	
13043	Brick Wenzel	T/A Saltys Enterprises, LLC
13044	Michael Pentony	NOAA - National Marine Fisheries Service
13045	Susannah Hatch	New England for Offshore Wind
13046	William Vachon	W. A. Vachon & Associates, Inc.
13047	Guy Simmons	
13048	Matthew Ireland	Massachusetts Office of the Attorney General
13049	Guy Simmons	
13050	Megan Amsler	
13051	Guy Simmons	
13052	Candace Wheeler	

Submission ID	Name	Organization Name
13053	Barbara Warren	
13054	David Petrie	
13055	Anna Gooding-Call	
13056	John Banks	
13057	Mary Reed PhD	
13058	Hannah Welch	
13059	George Detweiler	U.S. Coast Guard
13060	Joseph Myers	
13061	Maureen Knutsen	
13062	Joseph Kowalik	Marblehead Municipal Light Dept
13063	Kathleen Lique	
13064	Robert Snook	Connecticut Department of Energy & Environmental Protection
13065	John Hayes	Sustainability, Energy, and Resiliency Committee, City of Salem, MA
13066	Jeff Clark	Citizens Climate Lobby
13067	Francis Callahan	
13068	Laura Kuppinger	
13069	Rahana Schmalacker	
13070	Elodie Linck	
13071	Charles Carletta	
13072	Louis Rosado Burch	
13073	Cindy Keegan	
13074	Francis Pullaro	
13075	Julia Livermore	Rhode Island Department of Environmental Management
13076	Jonathan Levenshus	Sierra Club (form letter with 7,070 individual submissions)
13077	James Ryan	
13078	Wayne Reichle	
13079	Ross Gould	Workforce Development Institute
13080	Paul Geldmeier	
13081	Peter Thomas	Marine Mammal Commission
13082	Jay Mason	
13083	Heidi Ricci	Mass Audubon
13084	Florence Amate	
13085	Arthur Lightman	
13086	Emily Kiernan	
13087	Lisa Engler	Massachusetts Office of Coastal Zone Management
13088	John Nicholson	North Carolina Department of Environmental Quality
13089	Elizabeth Gibson	
13090	Thomas Dameron	Surfside Foods, LLC
13091	Kathleen Theoharides	Massachusetts Office of Energy and Environmental Affairs
13092	John Graziano	
13093	Josette Graziano	
13094	Anonymous	
13095	Michael Olsen	Equinor Wind US LLC
13096	Nicole DiPaolo	National Wildlife Federation (form letter with 9,563 individual submissions)
13097	Ron Smith	
13098	Grace Morrissey	Edison Energy, LLC
13099	Amy Winter	
13100	M Millar	
13101	Todd Sumner	
13102	Meghan Lapp	Seafreeze Ltd., Seafreeze Shoreside
13103	Chris Rein	
13104	John Chipman	

Submission ID	Name	Organization Name
13105	Mark Buonasera	
13106	avis ogillvy	
13107	Anonymous	
13108	Bob Brennan	
13109	Jihan Eljadidi	
13110	Jonathan Macchirole	
13111	Rachel Pachter	Vineyard Wind LLC
13112	Patrick Belmonte	
13113	Barbara Adams	
13114	Susan Strauss	
13115	Amber Hamlett	
13116	EJ Norton	
13117	Scot Mackey	
13118	Ryan Smith	
13119	Christian Adams	
13120	Mel Mooers	
13121	brennan owen	
13123	Dmitri Kiryk	
13124	Andrew Sutphin	
13125	Elizabeth Moellenhoff	
13126	James Certa	
13127	Mary Collari	
13128	Iris Moore	
13129	Shannon Souza	Oregon Coast Energy Alliance Network
13130	Nancy Sopko	
13131	Michael McGarty	
13132	Daniel Sze	
13133	Jon Mitchell	City of New Bedford
13134	Sophie Hartfield Lewis	Ørsted
13135	Maureen Jackman	
13136	James Murphy	National Wildlife Federation et al.
13137	Michael Washington	
13138	Audra Parker	
13139	Joel Whitman	
13140	Reginald Woodson	
13141	George Hagerman	
13142	Whitney Webber	Oceana
13143	Flora Tonthat	
13145	C Tamburry	
13146	Diana Brunswig-Bosso	
13147	Shaye Rooney	Commercial Fisheries Center of Rhode Island
13148	Torben Scheller	
13149	Pilar Thomas	Chappaquiddick Tribe of Wampanoag Nation
13150	Jennifer Regoli	
13151	Anonymous Voter	
13152	Steve Medeiros	Rhode Island Saltwater Anglers Association
13153	Paul Lattanzi	
13154	Annemarie Deluca	
13155	Edward Romaine	
13156	Christopher McGuire	The Nature Conservancy
13157	Maryann Staron	
13158	Patrick Paquette	Massachusetts Striped Bass Association
13159	L. Maurice A. Gulson	Maurice Gulson Consulting, LLC
13160	Kelly Vaisey	

Submission ID	Name	Organization Name
13161	David H. Wallace	
13162	Robert Freudenberg	Regional Plan Association
13163	Sean Mulvihill	
13164	Phoenix Gannon-Hills	
13165	John Cox	
13166	Ruth Perry	Shell Exploration and Production Company
13167	Bret Sparks	Fisheries Survival Fund
13168	U.S. Rep. Jim Himes, U.S. Sen. Richard Blumenthal, U.S. Sen. Christopher S. Murphy, U.S. Rep. John B. Larson	U.S. Congress
13169	Gregory DiDomenico	Science Center for Marine Fisheries
13170	Scott A. Weir	
13171	Charles Donadio	
13173	Bonnie Bain Massie	SAFE (Salem Alliance for the Environment)
13174	Barry Cohen	
13175	Nancy Iannuzzelli	
13176	Gene Grace	AWEA
13177	Emmanuel Martin-Lauzer	
13178	Barbara Stone	
13179	Matthew Stolz	
13180	Ben Backwell	
13181	Scot Mackey	Garden State Seafood Association
13182	Peter H Flournoy	
13183	Bonnie Brady	Long Island Commercial Fishing Association
13185	Annie Hawkins	RODA
13186	Mark Petrie	
13187-01	Public Meeting 1 Testimony, Tom Soldini	
13187-02	Public Meeting 1 Testimony, Kate Warner	
13187-03	Public Meeting 1 Testimony, Rosemary Carey	
13187-04	Public Meeting 1 Testimony, Paul Eidman	
13187-05	Public Meeting 1 Testimony, Alan Strahler	
13187-06	Public Meeting 1 Testimony, Marc Rosenbaum	
13187-07	Public Meeting 1 Testimony, Maria Hanna	
13187-08	Public Meeting 1 Testimony, Michael McGarty	
13187-09	Public Meeting 1 Testimony, Susannah Hatch	
13187-10	Public Meeting 1 Testimony, Ben Robinson	
13187-11	Public Meeting 1 Testimony, Richard Toole	
13187-12	Public Meeting 1 Testimony, Abby Watson	
13187-13	Public Meeting 1 Testimony, Daniel Webb	
13187-14	Public Meeting 1 Testimony, Ben Hellerstein	

Submission ID	Name	Organization Name
13187-15	Public Meeting 1 Testimony, Senator Marc Pacheco	
13187-16	Public Meeting 1 Testimony, Mike Jacobs	
13187-17	Public Meeting 1 Testimony, Keely Menezes	
13187-18	Public Meeting 1 Testimony, William Lake	
13187-19	Public Meeting 1 Testimony, David Borrus	
13187-20	Public Meeting 1 Testimony, William Bridwell	
13187-21	Public Meeting 1 Testimony, Nicole Dipaolo	
13187-22	Public Meeting 1 Testimony, Amber Hewett	
13187-23	Public Meeting 1 Testimony, David Araujo	
13188-01	Public Meeting 2 Testimony, Noli Taylor	
13188-02	Public Meeting 2 Testimony, Yaima Braga	
13188-03	Public Meeting 2 Testimony, Linda Lancaster	
13188-04	Public Meeting 2 Testimony, Daniel Seidman	
13188-05	Public Meeting 2 Testimony, Ziven Drake	
13188-06	Public Meeting 2 Testimony, William Hamner	
13188-07	Public Meeting 2 Testimony, David Borrus	
13188-08	Public Meeting 2 Testimony, Gary Harcourt	
13188-09	Public Meeting 2 Testimony, Jon Hartzband	
13188-10	Public Meeting 2 Testimony, Margaret Downey	
13188-11	Public Meeting 2 Testimony, David Dow	
13188-12	Public Meeting 2 Testimony, Sarah Griscom	
13188-13	Public Meeting 2 Testimony, Daniel Wolf	
13188-14	Public Meeting 2 Testimony, Richard Delaney	
13188-15	Public Meeting 2 Testimony, Brandon Burke	
13188-16	Public Meeting 2 Testimony, Kara Smith	
13189-01	Public Meeting 3 Testimony, David Hardy	
13189-02	Public Meeting 3 Testimony, Joe Martens	

Submission ID	Name	Organization Name
13189-03	Public Meeting 3 Testimony, Kai Salem	
13189-04	Public Meeting 3 Testimony, Eileen Mathieu	
13189-05	Public Meeting 3 Testimony, Fred Hopps	
13189-06	Public Meeting 3 Testimony, Bradley Lima	
13189-07	Public Meeting 3 Testimony, Mark Kresowik	
13189-08	Public Meeting 3 Testimony, John Rogers	
13189-09	Public Meeting 3 Testimony, Moncrieff Cochran	
13189-10	Public Meeting 3 Testimony, Lee Burns	
13189-11	Public Meeting 3 Testimony, Wendy Northcross	
13189-12	Public Meeting 3 Testimony, William Johnson	
13189-13	Public Meeting 3 Testimony, Janice Kubiak	
13189-14	Public Meeting 3 Testimony, Susan Starkey	
13189-15	Public Meeting 3 Testimony, Janet Williams	
13190-01	Public Meeting 4 Testimony, Senator Julian Cyr	
13190-02	Public Meeting 4 Testimony, Mariah Dignan	
13190-03	Public Meeting 4 Testimony, Captain David Monti	
13190-04	"Public Meeting 4 Testimony, Ted Roosevelt, IV"	
13190-05	Public Meeting 4 Testimony, Maria Marasco	
13190-06	Public Meeting 4 Testimony, Laura Morton	
13190-07	Public Meeting 4 Testimony, John O'Keeffe	
13190-08	Public Meeting 4 Testimony, Richard England	
13190-09	Public Meeting 4 Testimony, Gail Page	
13190-10	Public Meeting 4 Testimony, Adrienne Esposito	
13190-11	Public Meeting 4 Testimony, David Borrus	
13190-12	Public Meeting 4 Testimony, Paul Forsberg	
13190-13	Public Meeting 4 Testimony, Nathanael Greene	
13190-14	Public Meeting 4 Testimony, David Zeek	

Submission ID	Name	Organization Name
13190-15	Public Meeting 4 Testimony, Winston Vaughan	
13190-16	Public Meeting 4 Testimony, Dylan Fernandes	
13190-17	Public Meeting 4 Testimony, Jennifer Menard	
13190-18	Public Meeting 4 Testimony, David Cole	
13190-19	Public Meeting 4 Testimony, Joel Merriman	
13190-20	Public Meeting 4 Testimony, Holly Bellebuono	
13190-21	Public Meeting 4 Testimony, Don Keeran	
13190-22	Public Meeting 4 Testimony, Fred Zalcman	
13190-23	Public Meeting 4 Testimony, Francis Pullaro	
13190-24	Public Meeting 4 Testimony, Nicola Blake	
13190-25	Public Meeting 4 Testimony, Heidi Ricci	
13190-26	Public Meeting 4 Testimony, Gordian Raacke	
13190-27	Public Meeting 4 Testimony, Charles Mayo	
13190-28	Public Meeting 4 Testimony, Nancy Sopko	
13190-29	Public Meeting 4 Testimony, Duane Gates	
13190-30	Public Meeting 4 Testimony, Joel Reinbold	
13190-31	Public Meeting 4 Testimony, Gabriel Bellebuono	
13190-32	Public Meeting 4 Testimony, David Araujo	
13190-33	Public Meeting 4 Testimony, Tobias Glidden	
13190-34	Public Meeting 4 Testimony, Jonathan Levenshus	
13191-01	Public Meeting 5 Testimony, Lars Pedersen	
13191-02	Public Meeting 5 Testimony, Peter Himchak	
13191-03	Public Meeting 5 Testimony, Nick Krakoff	
13191-04	Public Meeting 5 Testimony, Michelle Sgarlat	
13191-05	Public Meeting 5 Testimony, Katie Almeida	
13191-06	Public Meeting 5 Testimony, Betsy Sowers	
13191-07	Public Meeting 5 Testimony, Mary Pendergast	

Submission ID	Name	Organization Name
13191-08	Public Meeting 5 Testimony, Robert Hannemann	
13191-09	Public Meeting 5 Testimony, Keith Lewison	
13191-10	Public Meeting 5 Testimony, Mike Okoniewski	
13191-11	Public Meeting 5 Testimony, Nina Wolff Landau	
13191-12	Public Meeting 5 Testimony, Jeannine Giguere-Gagnon	
13191-13	Public Meeting 5 Testimony, Jeffrey Kominers	
13191-14	Public Meeting 5 Testimony, Diane Hill	
13191-15	Public Meeting 5 Testimony, Guy Simmons	
13191-16	Public Meeting 5 Testimony, Len Greene	
13191-17	Public Meeting 5 Testimony, Dave Wallace	
13191-18	Public Meeting 5 Testimony, Judeth Van Hamm	
13191-19	Public Meeting 5 Testimony, Jeremy Welsh-Loveman	
13191-20	Public Meeting 5 Testimony, Joseph Huckemeyer	
13191-21	Public Meeting 5 Testimony, Witter Swanson	
13191-22	Public Meeting 5 Testimony, Jeff Kaelin	
13191-23	Public Meeting 5 Testimony, Steve Wenner	
13191-24	Public Meeting 5 Testimony, Laura Gardner	
13191-25	Public Meeting 5 Testimony, Stephen Coan	
13191-26	Public Meeting 5 Testimony, Evan Sauter	
13191-27	Public Meeting 5 Testimony, Alexander Thillerup	
13191-28	Public Meeting 5 Testimony, Meghan Lapp	
13191-29	Public Meeting 5 Testimony, Ann Berwick	
13191-30	Public Meeting 5 Testimony, Wesley Look	
13191-31	Public Meeting 5 Testimony, Gordon Starr	
13191-32	Public Meeting 5 Testimony, Bonnie Brady	
13191-33	Public Meeting 5 Testimony, Seth Kaplan	
13191-34	Public Meeting 5 Testimony, Ron Dagostino	

Submission ID	Name	Organization Name
13191-35	Public Meeting 5 Testimony, Tom Dameron	
13191-36	Public Meeting 5 Testimony, Marybeth Tooley	
13191-37	Public Meeting 5 Testimony, Luke Lefeber	
13191-38	Public Meeting 5 Testimony, Camilla Prata	
13191-39	Public Meeting 5 Testimony, Mark Phillips	
13191-40	Public Meeting 5 Testimony, Peter Flournoy	
13191-41	Public Meeting 5 Testimony, Nicole Dipaolo	
13191-42	Public Meeting 5 Testimony, Carli Brenner	
13191-43	Public Meeting 5 Testimony, Barry Cohen	
13191-44	Public Meeting 5 Testimony, Annie Hawkins	
13191-45	Public Meeting 5 Testimony, John Haran	
13192	Willett Kempton	
13193	Kristina Mazzamuto	
13194	Alyssa Stampone	
13195	Stefanie Berman	
13197	Jordan Berman	
13198	Alexa Rizzo	
13199	Jonathan Borseaux	
13200	Paul Rogalli	
13201	Joseph Cecala	
13202	Amanda Schoen	MHI Vestas Offshore Wind
13203	Diane Paquet-White	
13204	Daniel LaVecchia	LaMonica Fine Foods
13205	David H. Wallace	Wallace & Associates o/b/o surfclam, quahog, ITQ vessel owners
13206	Francis Maiorino	
13207	"Michael Lavecchia, Jr."	
13208	Saverio LaSorsa	
13209	Emanuel Labianca	
13210	Suzanne Simonetti	
13211	Carmen Artes	
13212	Gerrod Thompson	
13213	Paul Rogalli	
13214	Stephen Kelly	Carver Companies
13215	Somerset Board of Selectmen	Town of Somerset, MA
13216	Stephen R. Collins	Commercial Development Company, Inc.
13217	Alexis Borseaux	
13218	Raymond Candido	
13219	Anthony Simonetti	
13220	Christopher M. Lynch	Lawrence-Lynch Corp
13221	Julia Huang	
13222	Margaret Rogalli	
13223	Frank DiBartolo	
13224	Cory Candido	

Submission ID	Name	Organization Name
13225	Samantha Simonetti	
13226	Deborah Candido	
13227	Sydney Candido	
13228	Nick Lamorgese	
13229	Jonathan Borseaux	
13230	Margaret Lavecchia	
13231	Michele Redavid	
13233	Michael Romano	
13234	Sidney R. Florey	DEME Offshore US
13235	Willett Kempton	
13236	Robert Myers	
13237	Drew A. Carey	Inspire Environmental
13238	Scott DePlato	
13239	Ferdinand A. Griner	
13240	JoAnn Griner	
13241	David P. Hubbard	Gatzke Dillon & Balance LLP
13242	Michelle Kennedy	
13243	Lynn Lathberry	
13244	Michele Marks	
13245	Dennis McStravock	
13246	Tim Palardy	
13247	George Perovich	
13248	John F. Reardon	
13249	Sandra Ritchie	
13250	Anonymous	
13251	Philip L. Schenk	
13252	Robin Schroeder	
13253	Susan Simonetti	
13254	Steven J. Smaracko	Moran Shipping Agencies, Inc.
13255	Josh Wilbur	
13256	Ira G. Megdal	Cozen O'Connor
13257	Don Krevetski	Eastern Millwright Regional Council
13258	Sam M. Mirian	Migrant Constructors
13259	Joe R. Bekker	Thrustmaster
13260	AJ Jain	Sapura Energy
13261	Joseph I. Cerrigone	
13262	Joel Merriman	American Bird Conservancy

BOEM's resource specialists reviewed all substantive comments identified and responded to each accordingly. The substantive comments received on the SEIS and responded to in the FEIS are provided in Table K-12 (see Appendix K Part 2 in Volume IV of this report).

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The Department of the Interior Mission

As the Nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering the sound use of our land and water resources, protecting our fish, wildlife and biological diversity; preserving the environmental and cultural values of our national parks and historical places; and providing for the enjoyment of life through outdoor recreation. The Department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The Department also has a major responsibility for American Indian reservation communities and for people who live in island communities.

The Bureau of Ocean Energy Management



The Bureau of Ocean Energy Management (BOEM) works to manage the exploration and development of the nation's offshore resources in a way that appropriately balances economic development, energy independence, and environmental protection through oil and gas leases, renewable energy development and environmental reviews and studies.