

The Town of Barnstable

Office of Town Manager

367 Main Street, Hyannis, MA 02601

Office: 508.862.4610

Fax: 508.790.6226

www.townofbarnstable.us

Citizens' Resource Line: 508.862.4925

Mark S. Ells, Town Manager

mark.ells@town.barnstable.ma.us

M. Andy Clyburn, Assistant Town Manager

andy.clyburn@town.barnstable.ma.us

September 10, 2024

**BY CERTIFIED & ELECTRONIC MAIL (Elizabeth.klein@boem.gov &
Karen.baker@boem.gov)**

Elizabeth Klein, Director
Karen J. Baker, Renewable Energy
Bureau of Ocean Energy Management (BOEM)
Office of Communications
1849 C Street, NW
Washington, D.C. 2024

Dear Ms. Klein and Ms. Baker,

As Town Manager of the Town of Barnstable, I am writing on behalf of the Town and its residents to express the concerns we all share regarding the recent failure of the wind turbine at the Vineyard Wind 1 offshore wind farm. As you know, the wind farm is located in federal waters off the coast of Massachusetts, and the onshore facilities for the Vineyard Wind project are located within the Town of Barnstable. Specifically, we are deeply concerned about the impacts of the turbine failure on the marine environment as well as the lack of information provided to date on those impacts by the regulatory agencies overseeing this project. We ask that the following issues be considered and addressed, and that accurate, timely information be provided to the Town of Barnstable and the other affected communities on Cape Cod.

1. Environmental Impact Assessments

- **Ecosystem Disruption:** We seek information on the potential disruption to marine ecosystems caused by the failure of wind turbines. We ask for comprehensive assessments of how such failures might impact marine life, including fish, seabirds, and marine mammals.
- **Habitat Damage:** We ask that you address the potential damage to underwater habitats, such as coral reefs or seagrass beds, which may result from debris or other materials released during a turbine failure.

2. Debris and Pollution

- **Chemical Leaks:** We are concerned about the possible leakage of hazardous substances, such as lubricants or other chemicals used in turbine maintenance, into the marine environment.
- **Physical Debris:** In addition to the debris that is washing up on our beaches, there is the potential for the physical debris from failed turbines to create hazards for marine organisms and vessels. We need to hear from you what strategies are in place or are being developed to manage and mitigate this risk.

3. Emergency Response and Mitigation

- **Response Plans:** Robust emergency response plans must be developed and implemented to address turbine failures quickly and effectively. Protocols must be put in place for immediate containment and clean-up to minimize environmental damage.
- **Mitigation Measures:** Mitigation measures must be developed and implemented to reduce the likelihood and impact of turbine failures, including design improvements and better maintenance practices.

4. Monitoring and Reporting

- **Regular Monitoring:** There should be regular monitoring of offshore wind farms to detect early signs of potential issues and assess their environmental impact continuously.
- **Transparency:** The importance of transparency cannot be overstated with respect to the reporting of incidents and their impacts to the public, ensuring that data on turbine failures and their environmental consequences are readily accessible.

5. Long-Term Implications

- **Cumulative Impacts:** Consideration must be given to the long-term and cumulative impacts of turbine failures across multiple sites. This includes understanding how repeated failures could affect the broader marine environment and ecosystem health.
- **Lifecycle Management:** Planning must be undertaken for the lifecycle management of wind turbines, including decommissioning and removal processes, to prevent long-term environmental issues.

6. Regulatory and Policy Recommendations


- **Stricter Regulations:** To accomplish the above, we believe that BOEM must strengthen its regulations and standards for the design, construction, and maintenance of offshore wind turbines to reduce the risk of failures.

- **Industry Collaboration:** There must be better and ongoing collaboration among BOEM, wind energy developers, and environmental organizations to develop best practices and innovative solutions for mitigating the impacts of turbine failures.

By addressing these concerns, you can help ensure that BOEM takes a comprehensive approach to managing the potential risks associated with offshore wind turbine failures and their impacts on the marine environment. We request that you take a proactive approach and provide ongoing, effective communication on these issues with the communities who are dealing with the real life consequences, many of which are still unknown, of the recent Vineyard Wind blade failure.

Thank you for your time and attention to these critically important issues.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark S. Ells', written in a cursive style.

Mark S. Ells, Town Manager
Town of Barnstable

cc: Congressman Bill Keating
Lieutenant Governor Kim Driscoll
State Senator Julian Cyr
State Representative Kip Diggs
State Representative Steven Xiarhos
Town Council President Felicia Penn
Karen Nober, Barnstable Town Attorney