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VINEYARD WIND

EQUATOR PRINCIPLES ACTION PLAN INITIAL HUMAN RIGHTS ASSESSMENT

Vineyard Wind 1 Project

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I. Introduction and Methodology

Vineyard Wind 1 LLC (“Vineyard Wind”) is based in New Bedford, Massachusetts and is jointly owned by Copenhagen Infrastructure Partners P/S, and Avangrid Renewables, LLC. It is developing the first utility-scale offshore wind project in the United States in federal waters approximately 14 miles offshore of Massachusetts, known as the “Vineyard Wind 1 Project.” After intense scrutiny over a four-year period by over 20 federal, state, and local agencies, as of July 2021, Vineyard Wind holds all approvals and permits necessary to construct and operate the Project. The approval processes involved thousands of potentially impacted stakeholders who provided constructive feedback that informed the final project design and the hundreds of measures adopted to avoid, minimize, and mitigate the potential impacts of the Project on the human environment, including human rights. Details of the Project, the review processes and analyses, stakeholder engagement, and mitigation measures are available at <https://www.boem.gov/vineyard-wind> and are incorporated herein by reference.

This Initial Human Rights Assessment as a component of Vineyard Wind’s Equator Principles Action Plan (“Action Plan”) evaluates the potential impacts of the Vineyard Wind 1 Project on the human rights of stakeholders during the construction and operations of the project. It is based on the extensive stakeholder outreach (*see* Section V) and impact analyses conducted by over 20 federal and state agencies, all of which is incorporated herein by reference. *See e.g.*, <https://www.boem.gov/vineyard-wind>.

The assessment has been undertaken in accordance with the Guidance Note on Implementation of Human Rights Assessments Under the Equator Principles promulgated by the Equator Principles Association in September 2020, as well as the Guiding Principles on Business and Human Rights promulgated by the United Nations. The Action Plan identifies and assesses the potential effects of the Vineyard Wind 1 Project on potentially impacted rights-holders, including community stakeholders and workers.

II. The Vineyard Wind 1 Human Rights Policy

This assessment is developed within the framework of Vineyard Wind’s corporate policy on human rights that was guided by, consistent with, and reflects the international human rights principles encompassed in the Universal Declaration of Human Rights, the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact, the United Nations Guiding Principles on Business and Human Rights, and the Sustainable Development Goals approved by the member states of the United Nations. The policy is attached hereto as Attachment 1.

III. Overview of the Vineyard Wind 1 Project

The Vineyard Wind 1 Project is an 800 megawatt (“MW”) wind energy project located within the United States Bureau of Ocean Energy Management (“BOEM”) Lease Area OCS-A 0501 approximately 14 miles offshore of the Commonwealth of Massachusetts. It consists of offshore Wind Turbine Generators (“WTGs”) (each placed on a foundation support structure), an Electrical Service Platform (“ESP”), an onshore substation, offshore and onshore cabling, and onshore operations & maintenance facilities. The Project is detailed in its approved Construction and Operations Plan (“COP”) that is available at <https://www.boem.gov/vineyard-wind>.



Figure 1 Location of the Vineyard Wind 1 Project Offshore of Massachusetts

The key project elements include:

- 62 GE Haliade-X 13 MW WTGS with monopile foundations placed in a 1x1 NM grid to allow for safe fishing and transit. There are 12 different strings with 5-6 turbines on each.
- One offshore ESP with step-up transformers (66 kV to 220 kV) and other electrical gear.
- Scour protection at all WTG locations.
- 66 kilovolt (“kV”) inter-array cables to connect radial “strings” of 5-6 WTGs to the ESP.
- 220 kV offshore export cables to connect the offshore ESP to the landfall site at Covell’s Beach in Barnstable, Massachusetts.
- 220 kV underground onshore export cables to connect the landfall site to a 220 kV to 115 kV step down onshore substation and the subsequent interconnection to the bulk power grid in Barnstable. The 8.5 km onshore cable route is buried under public roads through a right-of-way granted by the Town of Barnstable

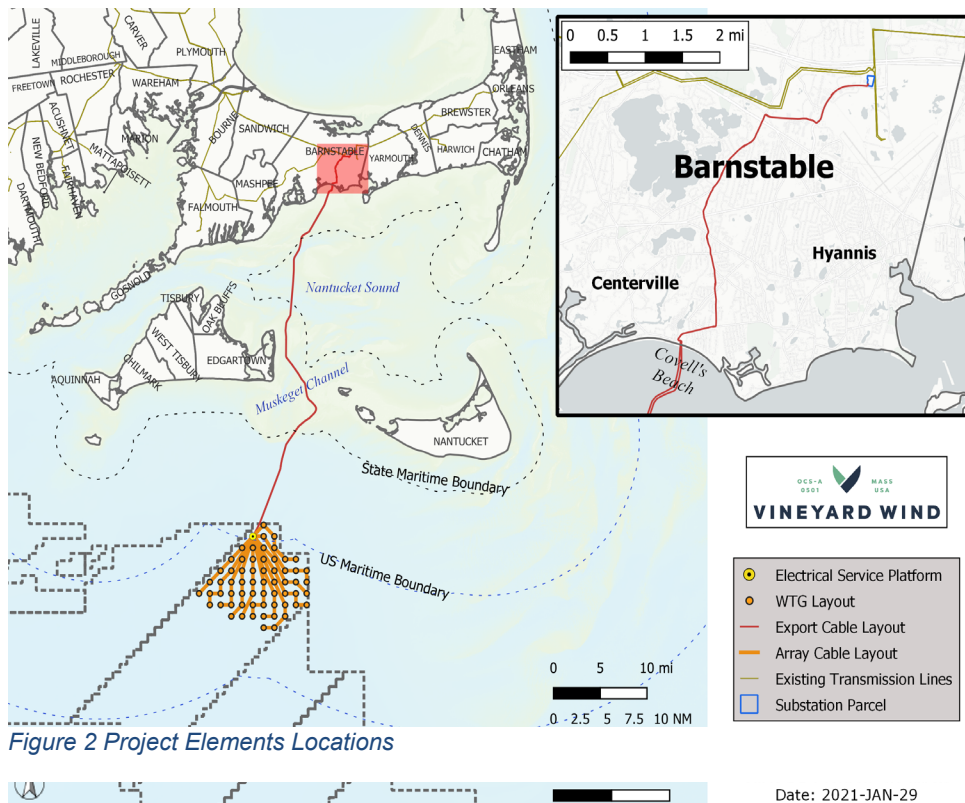


Figure 2 Project Elements Locations

Date: 2021-JAN-29

IV. Local Human Rights Context

The principal offshore construction and installation activities will be concentrated in New Bedford, Massachusetts, offshore in federal waters on the Outer Continental Shelf (“OCS”) and Massachusetts state waters. Ports located elsewhere in Massachusetts and in Rhode Island may potentially serve as staging areas for some Project components. Onshore construction activities will occur in Barnstable, Massachusetts. During the operations and maintenance phase, activities will be concentrated in Martha’s Vineyard and New Bedford Massachusetts and on the OCS. Thus, for purposes of this analysis, the Project region includes the communities in Barnstable, New Bedford, and Martha’s Vineyard, Massachusetts. A full analysis of the socioeconomic demographics and environmental justice communities is contained in Volume III, Section 7.0 of Vineyard Wind’s COP and is incorporated herein by reference. *See* <https://www.boem.gov/vineyard-wind>.

The Project is governed by the laws of the United States and Massachusetts where human rights are protected by the Constitution of the United States, the Bill of Rights, the Massachusetts Constitution, international treaties ratified by the United States, e.g., the International Covenant on Civil and Political Rights, and federal and state laws, e.g., Civil Rights Act of 1964, Massachusetts Civil Rights Act. Barnstable County where the principal onshore Project activities will take place has a Human Rights Advisory Commission that provides a mechanism for filing human rights complaints. *See* <https://www.barnstablecountyhrac.org/>.

V. Stakeholder Engagement

Since 2015, Vineyard Wind has actively engaged with federal, state, and local agencies, affected municipalities, federally-recognized tribes, fishermen, and other stakeholders regarding Project’s status, planned studies, issues of concern, and related matters. A list of meetings conducted with BOEM, other agencies, municipalities, and tribes prior to and immediately following submission of the COP in December 2017 is provided in Attachment 2.

In addition to the meetings described in Attachment 2, extensive and ongoing consultation has been conducted with key stakeholders by Vineyard Wind and Vineyard Wind’s community partner, Vineyard Power. The Project has also held numerous public events, including five community open houses: November 7, 2017, January 22, 2018, and February 2, 2018 in Hyannis/Barnstable, November 8, 2017 and March 7, 2018 in Yarmouth, all of which were advertised in local papers. In early 2018, Project representatives hosted six office hours sessions (also advertised in local papers, posted in community center bulletin and posted on the Vineyard Wind Website) in Yarmouth. The Project hosted a community forum for abutters in Barnstable, sending out invites to each Barnstable abutter for the event. Vineyard Wind’s fisheries liaison and representatives have been active in organizing hundreds of meetings with fisheries stakeholders.

In addition to Vineyard Wind’s stakeholder meetings, on December 7, 2018, BOEM published the draft Environmental Impact Statement (DEIS) for the Project which was followed by a 45-day public comment period that included five (5) public hearings in Massachusetts and Rhode Island. BOEM received a total of 341 unique submittals from the public, agencies, and other interested groups and stakeholders. On June 12, 2020, in response to comments from the public and other federal and state agencies, BOEM published a supplement to the DEIS for additional public review and comment. During the public comment period for the supplemental DEIS BOEM held five (5) virtual public meetings and received approximately 3,500 unique submittals from the public, agencies, and other interested groups and stakeholders.

BOEM also conducted a Section 106 process pursuant to the National Historic Preservation Act. This included multiple meetings and comments from numerous consulting parties, including federally recognized and historically recognized tribes. In addition, BOEM held government-to-government consultations with the federally recognized tribes. These extensive consultations resulted in a Memorandum of Agreement (MOA) setting forth how the Project will resolve all adverse effects to historical and cultural resources. Details regarding the Section 106 process and the findings of adverse effects are available at <https://www.boem.gov/sites/default/files/documents/oil-gas-energy/Vineyard-Wind-Finding-of-Adverse-Effect.pdf> and <https://www.boem.gov/sites/default/files/documents/renewable-energy/state-activities/Supplemental-FoAE.pdf>. The MOU is available at <https://www.boem.gov/sites/default/files/documents/renewable-energy/state-activities/Vineyard%20Wind-1-COP-Section-106-MOA.pdf>.

Vineyard Wind’s consultation with numerous stakeholders continues with, including, but not limited to, the following groups:

<ul style="list-style-type: none"> • Alliance to Protect Nantucket Sound • Anglers for Offshore Wind • Association to Preserve Cape Cod • Cape and Islands Self-Reliance • Cape and Vineyard Electrical Cooperative • Cape Cod Fishermen’s Alliance • Cape Cod Chamber of Commerce • Cape Cod Climate Change Collaborative • Cape Cod Community College • Cape Cod Technology Council • Cape Light Compact • Centerville Civic Association • Climate Action Business Association • Coalition for Social Justice • Commercial Fisheries Center of Rhode Island • Conservation Law Foundation • Coonamessett Farm Foundation • Delaware Tribe of Indians • Eastern Fisheries 	<ul style="list-style-type: none"> • MA Fisheries Working Group • Long Island Commercial Fishing Association • MA Fisheries Institute • MA Fishermen’s Partnership and Support Services • MA Habitat Working Group • MA Lobstermen’s Association • Martha’s Vineyard Fishermen Preservation Trust • Massachusetts Audubon Society • Massachusetts Chappaquiddick Tribe of the Wampanoag Nation • Massachusetts Clean Energy Center • Mohegan Tribe of Indians of Connecticut • Nantucket Rotary Club • National Academies of Sciences, Offshore Renewable Energy Development and Fisheries Conference • Narragansett Indian Tribe • National Wildlife Federation • Natural Resources Defense Council
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<ul style="list-style-type: none"> • Environment Massachusetts • Environmental Business Council of New England • Environmental League of Massachusetts • Fishing Partnership Support Services • Hercules SLR • Job Training and Employment Corporation, Cape Cod • KSJ Seafood Inc. • Long Island Commercial Fishing Association • MA Fisheries Institute • MA Fisheries Working Group • MA Fishermen’s Partnership and Support Services • Centerville Civic Association • Climate Action Business Association • Coalition for Social Justice • Commercial Fisheries Center of Rhode Island • Conservation Law Foundation • Coonamessett Farm Foundation • Eastern Fisheries • Environment Massachusetts • Environmental Business Council of New England • Environmental League of Massachusetts • Fishing Partnership Support Services • Hercules SLR • Job Training and Employment Corporation, Cape Cod 	<ul style="list-style-type: none"> • NE Fisheries Sciences Center • NE Fishery Management Council • NE Fishery Sector Managers VII, VIII X, XI, XIII • New Bedford Harbor Development Commission • New Bedford Port Authority • New England Aquarium • New England Energy and Commerce Association • Port of New Bedford • Recreational Fishing Alliance • Responsible Offshore Development Alliance (RODA) • Rhode Island Fishermen’s Advisory Board • Rhode Island Habitat Advisory Board • Scallop Industry Advisors Meeting • Seafreeze • Shinnecock Indian Nation • Sierra Club • Stoveboat- Saving Seafood • The Nature Conservancy • The Trustees of Reservations • Town Dock • Unitarian Church of Barnstable Green Sanctuary Committee • University of Massachusetts (various campuses) • Wampanoag Tribe of Gay Head-Aquinnah • Woods Hole Oceanographic Institution
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VI. Summary of Project Impacts

The potential Project impacts have been extensively analyzed by numerous federal, state, and local agencies. BOEM, as the lead federal agency, published in March 2021 its Final Environmental Impact Assessment (“FEIS”), which identified over 100 mitigation measures that Vineyard Wind agreed to implement. See <https://www.boem.gov/vineyard-wind>. The FEIS categorized the potential impacts of the Project from negligible to major on each potentially affected resource. The definitions for each impact category are found in Table 3-1 of the FEIS. The table below summarizes the FEIS impact findings.

Resource	Project Impacts
Coastal Habitats	Negligible to moderate and moderate beneficial
Benthic Resources	Negligible to moderate and moderate beneficial
Finfish, Invertebrates, and Essential Fish Habitat	Negligible to moderate and moderate beneficial
Marine Mammals:	Negligible to moderate and potentially minor beneficial
Sea Turtles	Negligible to moderate and potentially minor beneficial
Demographics, Employment, and Economics	Negligible to moderate and negligible to minor beneficial
Environmental Justice	Negligible to major, depending on the specific community affected, and beneficial effects

Cultural, Historical, and Archaeological Resources	Negligible to major, depending on the specific resource affected
Recreation and Tourism:	Negligible to moderate and negligible to minor beneficial
Commercial Fisheries and For-Hire Recreational Fishing:	Negligible to moderate
Navigation and Vessel Traffic:	Negligible to moderate
Other Uses	Military and national security: minor for most but moderate for search and rescue activities; Aviation and air traffic: minor; Cables and pipelines: negligible; Radar systems: minor; Scientific research and surveys: major
Air Quality	Negligible to minor and minor beneficial
Water Quality:	Negligible to minor
Birds	Negligible to minor and potentially minor beneficial
Bats	Negligible
Terrestrial and Coastal Fauna	Minor
Land Use and Coastal Infrastructure	Negligible to minor and negligible to minor beneficial

VII. Initial Scan for Human Rights Impacts

For purposes of this initial human rights assessment, based on the extensive public outreach and impact analyses conducted, the potentially affected rights of community stakeholders include the Federally Recognized Tribes, Massachusetts Historically Recognized Tribes, and Commercial fishermen. An assessment of the potential human rights risks to workers on the Project is also provided.

A. Federally Recognized Tribes

Federally recognized tribes in the Project area include the Delaware Tribe of Indians, Mohegan Tribe of Indians of Connecticut, Narragansett Indian Tribe, Shinnecock Indian Nation, the Wampanoag Tribe of Gay Head-Aquinnah, the Mashpee Wampanoag Tribe, and the Mashantucket Pequot. Nantucket Sound, through which the Project’s export cable will be installed, has been determined eligible for listing on the National Register of Historic Places (“NRHP”) as a Traditional Cultural Property (“TCP”) for, among other things, its associations with the ancient and historic period of Native American exploration and settlement of Cape Cod and the Islands, and with the central events of the Wampanoags' stories of Maushop and Squant/Squannit. In addition, the wind development area on the OCS is part of the Mashpee Wampanoag cultural heritage and its traditional bonds to the past and importance to their cultural identity, sense of self, and future well-being.

Documentary and field research conducted by Vineyard Wind identified that submerged portions of the Project area were subaerial during and immediately following the last glacial maximum. Vineyard Wind identified 31 ancient landform features (stream channel, lake, and estuarine landscape features) within the wind development area and Nantucket Sound that have the potential to contain pre-contact Native American archaeological sites dating prior to the inundation of the OCS during the late Pleistocene and early Holocene. While the studies

performed did not find any direct evidence of pre-contact Native American cultural materials, the federally recognized tribes consider the submerged ancient landforms, whether or not they contain archaeological data, significant resources as vestiges of the landscape occupied by their ancestors and as the locations where events from tribal oral histories occurred. Construction of the Project would result in the permanent, physical destruction of or damage to all or part of 19 or the 31 identified ancient landforms.

In addition, during the Section 106 consultation process, the area, located along the western side of Martha's Vineyard, was identified as containing deep cultural significance to the Aquinnah people, and is associated with the culture hero Moshup and was therefore identified as a TCP. The TCP is located within the lands and waters that encompass Vineyard Sound, the Elizabeth Islands, the Gay Head Cliffs, and Nomans Island, and includes the associated shallow water shoals that are found along the southwestern and western shores of Martha's Vineyard. While no Project activities will take place near the TCP, the maritime setting of the TCP and its viewshed would be altered through the introduction of new visual elements within the setting. However, the majority of the inland portion of the TCP will have no view of the Project due to topographic changes and mature vegetation with only 4 percent of the TCP having potential visibility of the Project. The closest WTG will be located 26.4 km (16.4 miles) from the TCP.

As Indigenous Peoples, the federally recognized tribes are afforded unique group rights under international law that permits them to give or withhold their consent to projects that may impact them under certain scenarios. Here, the tribes actively participated in the Section 106 process and engaged in government-to-government consultation with BOEM regarding the Project. The tribes assisted in the development of mitigation measures to resolve adverse effects and provided comments on the MOA. Vineyard Wind continues to involve the tribes as the mitigation measures are implemented. Indeed, the tribes have complemented Vineyard Wind for its extensive and supportive engagement with them. *Based on the foregoing, the assessment of human rights risk to the Federally Recognized Tribes is low.*

B. Massachusetts Historically Recognized Tribes

The Chappaquiddick Wampanoag Tribe is a historically recognized tribe by Massachusetts. There are no tribal lands on Chappaquiddick Island; nor do many tribal members live of the Island. Rather, the Tribe is comprised of several families who consider certain locations on Chappaquiddick Island traditional cultural places based on their members' current and past cultural practices. These locations include (but are not limited to) ceremonial viewsheds associated with sunrise and sunset activities; morning and full moon ceremonies; and ceremonies for hunting of marine and land mammals. Other significant associations are for subsistence activities (berry picking, fishing, clamming) and sea mammal harvesting for whales and seals. Collecting sage, wild indigo, and herbs also played a role in identifying these properties as significant cultural resources. In conjunction with the Section 106 process, BOEM considered eight identified locations on Chappaquiddick Island as contributing elements to the Chappaquiddick Island TCP.

No Project activities will occur on Chappaquiddick Island. However, the Project is within the maritime setting of the TCP and its viewshed would be altered through the introduction of new visual elements within the setting. Tribal members participated in the Section 106 process conducted by BOEM but were not afforded the same government-to-government relationship with BOEM as the tribe is not federally recognized. Tribal members expressed various concerns throughout the Section 106 process, which were addressed in BOEM’s Finding document (available at <https://www.boem.gov/sites/default/files/documents/oil-gas-energy/Vineyard-Wind-Finding-of-Adverse-Effect.pdf>).

To resolve the adverse visual effects of the Project, Vineyard Wind is funding an ethnographic study and preparing a NRHP nomination package for the Chappaquiddick Island TCP, which is described in more detail in the MOA. Although this measure would not resolve the visual impacts, it will fund an ethnographic study that will document the TCP and prepare the documentation package needed to nominate the TCP for NRHP eligibility listing. The study will document and preserve Tribal oral histories, cultural traditions and promote internal religious and spiritual beliefs. Obtaining a NRHP eligibility listing would also assist the Tribe in gaining the additional recognition by state and federal governments it seeks. *Based on the foregoing, the assessment of human rights risk to the Chappaquiddick is low.*

C. Commercial Fishermen

Fisheries resources in federal waters off New England generate a significant amount of revenue. Commercial fisheries in the northeast United States are known for the large landings of herring, menhaden, clam, squid, scallop, skate, and lobster, and for being a notable source of profit from scallop, lobster, clam, squid, and other species. The Project area comprises an approximate 65,000 acres of the otherwise vast ocean off New England.

Based on available data, BOEM analyzed the value of landings by commercial fishermen from the Project area, which varies from year-to-year but overall makes up a fraction (less than 0.5%) of the value of all landings accounted for under federal fisheries management plans. *See* FEIS Vol. 2, Table 3.10-4b.

Nevertheless, the construction and operation of the Project will have disruptive effects on the commercial fishermen that fish in the Project area. As noted above, BOEM determined that the overall impacts of the Project to commercial fishermen range from negligible to moderate, with the more impact producing factors occurring during construction. The potential impacts include increased safety risks while fishing or navigating through the project and the potential loss of fishing grounds.

The potential human rights risks include the risk to job security and the right to work (loss of income) and the right to life and security of person (health and safety). To mitigate these risks, significant mitigation measures have been put in place including, but not limited to:

- realigning the Project in a 1 x 1 nautical mile layout to accommodate safe fishing within the Project area;

- eliminating turbines at the northernmost point of the Project area where commercial fishermen regularly transit to reduce safety risks;
- providing substantial funding for such things as improvements in fishing vessels and gear, widespread deployment of navigational equipment, new gear types or fishing methods, and purchase of updated safety equipment such as radar, GPS, survival suits, emergency position-indicating radio beacons, life rafts, etc.;
- maintaining a robust communications program with commercial fishermen;
- compensating fishermen for any gear that may be lost or damaged due to the Project; and
- providing compensatory funds for those individual fishermen that are financially impacted by the Project.

With the mitigation measures in place, the assessment of human rights risk to commercial fishermen is low.

D. Project Workers

The table below provides an assessment of the potential risks the Project may pose to workers employed by Vineyard Wind or its contractors. As demonstrated, Vineyard Wind has robust Human Rights and workplace policies that protect the rights of workers. In addition, numerous state and federal laws protect worker rights. *As such, the risk of violating the rights of workers on the Project is extremely low.*

Human Rights Issue	Context	Project Impact/Risk	Mitigation
Child Labor	<p>Section 212 of the federal Fair Labor Standards Act prohibits employers from employing any “oppressive child labor” and places restrictions on what, when and how minors can work in the United States. (29 U.S.C. § 212)</p> <p>Massachusetts law (M.G.L. c. 149 § 56) places further restrictions on hours worked by minors and types of work in which minors can be engaged in.</p>	Low	<p>VW’s Human Right Policy prohibits child labor, forced labor, prison labor, slavery, and human trafficking. VW’s Supplier Code of Ethics prohibits contractors from using forced labor, prison labor, child labor, slavery, and human trafficking and must develop the necessary measures to eliminate and prevent the use of forced labor.</p> <p>VW undertakes before the start of construction a supply chain risk assessment to identify any high-risk primary suppliers. High-risk suppliers are not engaged but if they were VW would monitor them through the procurement process.</p>
Collective bargaining and Freedom of association	<p>The National Labor Relations Act explicitly grants employees the right to collectively bargain and join trade unions. (29 U.S.C. § 151 et seq.)</p> <p>Massachusetts prohibits unfair labor practices, including interfering with, coercing, or restraining employees from exercising their labor rights. (M.G.L. c. 150A § 4)</p>	Low	<p>VW requires that its suppliers respect the freedom of union association and the workers’ right to collective bargaining, subject to the law applicable in each case.</p> <p>VW requires all contractors to represent and verify that their human resources policies and procedures comply with VW’s Supplier Code of Ethics and Human Rights Policy.</p>
Modern Slavery	<p>Human trafficking is a crime in the U.S. federally, under the Trafficking Victims Protection Act of 2000.</p>	Low	<p>VW’s Human Right Policy prohibits child labor, forced labor, prison labor, slavery, and human trafficking. VW’s Supplier Code of Ethics prohibits contractors from using</p>

	Massachusetts prohibits forced labor, labor trafficking and sex trafficking under the 2011 law “An Act relative to the Commercial Exploitation of People”		<p>forced labor, prison labor, child labor, slavery, and human trafficking and must develop the necessary measures to eliminate and prevent the use of forced labor.</p> <p>VW requires all contractors to represent and verify that their human resources policies and procedures comply with VW’s Supplier Code of Ethics and Human Rights Policy</p>
Job Security/Right to Work	Both federal and Massachusetts law prohibit discrimination in the workplace both in the hiring, and termination of employees. For example, under federal law, employers cannot terminate employees or refuse to hire employees based on race, color, religion, national origin, or sex. (Title VII of the Civil Rights Act of 1964), pregnancy (The Pregnancy Discrimination Act), age (The Age Discrimination in Employment Act of 1967), and disability (the Americans with Disabilities Act of 1990). Massachusetts has analogous state laws preventing discrimination: M.G.L. c.93 §§ 102, 103 (equal rights violations), M.G.L. c.151B § (unlawful discrimination because of race, color, religious creed, national origin, sex, gender identity, sexual orientation, genetic information, pregnancy, ancestry, veteran status)	Low	<p>VW maintains generous programs that promote training, equal opportunities for advancement, and professional career development. Project team members are encouraged to continuously update their professional knowledge and to take advantage of offered training programs. Performance evaluations, based on objective standards, are conducted annually with workers being provided constructive feedback and opportunities for improvement and growth.</p> <p>VW requires all contractors to represent and verify that their human resources policies and procedures comply with VW’s Supplier Code of Ethics and Human Rights Policy</p>
Non-Discrimination	Both federal and Massachusetts law prohibit discrimination in the workplace both in the hiring, and termination of employees. For example, under federal law, employers cannot terminate employees or refuse to hire employees based on race, color, religion, national origin, or sex. (Title VII of the Civil Rights Act of 1964), pregnancy (The Pregnancy Discrimination Act), age (The Age Discrimination in Employment Act of 1967), and disability (the Americans with Disabilities Act of 1990). Massachusetts has analogous	Low	VW has adopted strong policies designed to prohibit illegal discrimination. Its employment decisions are made without regard to categories protected by applicable state or federal law, including, without limitation, a person’s race, color, nationality, social origin, religion, age, gender, marital status, sexual orientation, religion, disability, veteran status, genetic information. “Employment decisions” generally include those related to hiring, recruiting, training, promotion, compensation, discipline and termination.

	<p>state laws preventing discrimination: M.G.L. c.93 §§ 102, 103 (equal rights violations), M.G.L. c.151B, § 4 (unlawful discrimination because of race, color, religious creed, national origin, sex, gender identity, sexual orientation, genetic information, pregnancy, ancestry, veteran status)</p>		<p>VW requires all contractors to represent and verify that their human resources policies and procedures comply with VW’s Supplier Code of Ethics and Human Rights Policy</p>
Occupational health and safety	<p>The Occupational Safety and Health Standards Act (29 U.S.C. § 651) protects workers from dangerous working conditions, and employees have a right to speak out against hazardous working conditions without fear of retaliation.</p> <p>Massachusetts does not have a federally approved occupational safety and regulatory program, and therefore the Federal OSH Act applies to private sector workplaces.</p>	Low	<p>VW is committed to health and safety in the workplace, and the use of preventive measures to minimize occupational hazards and risks. It provides workers with the tools, equipment and training necessary to perform their jobs safely at all times. It has ongoing programs and processes intended to continually improve health and safety performance. The project has a Safety Management System the details the roles, responsibilities, processes, and procedures to ensure the health and safety of all project activities that was prepared in accordance with the requirements of ISO 45001.</p> <p>VW reviews Contractor’s Safety Management Systems and conducts ongoing monitoring of safety performance.</p>
Wages (pay equity)	<p>The Equal Pay Act of 1963 (29 U.S.C. § 206(d)) <i>prohibits sex-based wage discrimination between men and women in the same establishment who perform jobs that require substantially equal skill, effort and responsibility under similar working conditions.</i></p> <p>The Massachusetts Equal Pay Act (M.G.L. c. 149, § 105A) prohibits employers from discriminating against employees because of their gender when deciding and paying wages. Employers cannot pay workers a salary or wages less than what they pay employees of a different gender for comparable work.</p>	Low	<p>VW’s employee pay scale is commensurate with market standards for a given position. VW requires that suppliers pay their employees in accordance with the provisions of applicable wage laws, including minimum wages, overtime, and social security benefits.</p> <p>VW requires all contractors to represent and verify that their human resources policies and procedures comply with VW’s Supplier Code of Ethics and Human Rights Policy.</p>

<p>Working Hours</p>	<p>Neither Massachusetts law nor federal law limits the number of hours an employee can work. However, Massachusetts law requires 30 minute meal breaks for every 6 hours worked, and most employers must allow workers 1 day off after 6 consecutive days of work.</p>	<p>Low</p>	<p>VW does not mandate unreasonable working hours and provides employees significant flexibility in managing their time. VW respects the personal and family lives of its team members through the promotion of programs intended to encourage a balance between personal and work responsibilities. VW requires that its suppliers take steps and adopt all required measures within their organization to eliminate all kinds or forms of forced or compulsory labor, understood as any work or service demanded from an individual under threat of any kind of penalty.</p>
<p>Freedom of Expression</p>	<p>While generally there is no right to engage in speech in private sector work places, the National Labor Relations Act protects speech and expression related to working conditions, which could include compensation and benefits, and supporting social or political causes such as fair wages.</p>	<p>Low</p>	<p>VW respects the rights of workers to express their opinions freely. It does not impose any limitations on the content of speech other than ensuring that confidential information is not disclosed.</p> <p>VW does not tolerate hate or discriminatory speech which is enforced through its Worker Code of Conduct.</p>
<p>Right to Life and Security of Person</p>	<p>The Occupational Safety and Health Standards Act (29 U.S.C. § 651) protects workers from dangerous working conditions, and employees have a right to speak out against hazardous working conditions without fear of retaliation.</p>	<p>Low</p>	<p>VW does not tolerate threats or acts of violence in the workplace. This includes violence in any form, including physical, sexual, and psychological. Violations may result in termination of employment, and even support criminal prosecution in extreme cases. Abuse of authority and intimidation are also prohibited in the workplace.</p>
<p>Privacy</p>	<p>The Health Insurance Portability and Accountability Act of 1996 (HIPAA) is a federal law that required the creation of national standards to protect sensitive patient health information from being disclosed without the patient's consent or knowledge.</p> <p>M.G.L. c. 214, § 1B guarantees individuals a right against unreasonable, substantial or serious interferences with their privacy.</p>	<p>Low</p>	<p>VW has Human Resources policies and procedures to protect the privacy of employees and contractors.</p> <p>VW requires all contractors to represent and verify that their human resources policies and procedures comply with VW's Supplier Code of Ethics and Human Rights Policy</p>

<p>Right to Education</p>	<p>Part II, c. 5, Section 2 of the Massachusetts Constitution require the government to provide a constitutionally adequate level of education in public schools for children of the Commonwealth.</p>	<p>Low</p>	<p>VW’s Human Right Policy prohibits child labor, forced labor, prison labor, slavery, and human trafficking. VW’s Supplier Code of Ethics prohibits contractors from using forced labor, prison labor, child labor, slavery, and human trafficking and must develop the necessary measures to eliminate and prevent the use of forced labor. VW promotes educational opportunities for its workers.</p>
<p>Right to Health</p>	<p>The Occupational Safety and Health Standards Act (29 U.S.C. § 651) protects workers from dangerous working conditions, and employees have a right to speak out against hazardous working conditions without fear of retaliation.</p> <p>Massachusetts does not have a federally approved occupational safety and regulatory program, and therefore the Federal OSH Act applies to private sector workplaces.</p>	<p>Low</p>	<p>VW is committed to health and safety in the workplace, and the use of preventive measures to minimize occupational hazards and risks. VW’s Supplier Code of Ethics requires suppliers to ensure the protection of their employees, particularly protecting them from overexposure to chemical, biological, or physical hazards or to tasks demanding excessive physical effort at the workplace.</p> <p>VW reviews Contractor’s Safety Management Systems and conducts ongoing monitoring of safety performance.</p>
<p>Children’s Rights</p>	<p>Section 212 of the federal Fair Labor Standards Act prohibits employers from employing any “oppressive child labor” and places restrictions on what, when and how minors can work in the United States. (29 U.S.C. § 212)</p> <p>Massachusetts law (M.G.L. c. 149 § 56) places further restrictions on hours worked by minors and types of work in which minors can be engaged in.</p>	<p>Low</p>	<p>VW’s Human Right Policy prohibits child labor and its Supplier Code of Ethics prohibits contractors from using forced labor and child labor. Also as noted, VW respects the personal and family lives of its team members through the promotion of programs intended to encourage a balance between personal and work responsibilities.</p> <p>VW requires all contractors to represent and verify that their human resources policies and procedures comply with VW’s Supplier Code of Ethics and Human Rights Policy</p>
<p>Disability Rights</p>	<p>Employers are prohibited from discriminating on the basis of disability under the Americans with Disabilities Act of 1990 and M.G.L. c. 151B. Employers must provide reasonable accommodations to qualified disabled individuals.</p>	<p>Low</p>	<p>All employment decisions are made without regard to categories protected by applicable state or federal law. These categories include, without limitation, a person’s race, color, nationality, social origin, religion, age, gender, marital status, sexual orientation, religion, disability, veteran status, genetic information. “Employment decisions” generally include those related to hiring,</p>

			<p>recruiting, training, promotion, compensation, discipline and termination.\</p> <p>VW requires all contractors to represent and verify that their human resources policies and procedures comply with VW’s Supplier Code of Ethics and Human Rights Policy</p>
Women’s Rights	<p>The Federal government has anti-discrimination statutes that protect women’s rights: Title VII of the Civil Rights Act of 1964), The Pregnancy Discrimination Act, The Violence Against Women Act.</p> <p>Massachusetts has anti-discrimination statutes that protect women’s rights: M.G.L. c.151B (Unlawful discrimination because of sex), M.G.L. c.151B, § 4(1E) (Pregnant workers fairness act), M.G.L. c.149, §§ 105A-C (Discriminatory wage rates based on sex).</p>	Low	<p>All employment decisions are made without regard to a person’s gender and compensation decisions are based on a person’s qualifications and performance, not gender. VW has a liberal maternity (and paternity) leave policy. It also works to advance the careers of women in its workforce. In fact, 50 percent of its leadership team and 57 percent of its team members are women.</p> <p>VW requires all contractors to represent and verify that their human resources policies and procedures comply with VW’s Supplier Code of Ethics and Human Rights Policy</p>

Attachment 1

VINEYARD WIND 1 LLC HUMAN RIGHTS POLICY

The Board of Managers of Vineyard Wind, LLC (“Vineyard Wind”) oversees the management of Vineyard Wind and its business with a view to enhance the long-term value of Vineyard Wind for its members. The Board of Managers of Vineyard Wind (the “Board”) has adopted this Human Rights Policy (this “Policy”) to assist in exercising its responsibilities to Vineyard Wind and its members. This Policy is subject to periodic review and modification by the Board from time to time. This Policy and Vineyard Wind’s limited liability company agreement, corporate governance guidelines and other policies pertaining to corporate governance and regulatory compliance, risk, and social responsibility (collectively, the “Corporate Governance System”) form the framework of governance of Vineyard Wind. Vineyard Wind’s Corporate Governance System is inspired by and based on a commitment to ethical principles, transparency and leadership in the application of best practices in good governance and is designed to be a working structure for principled actions, effective decision-making and appropriate monitoring of both compliance and performance.

1. Purpose

Respect for human rights is fundamental to the sustainability of Vineyard Wind and the communities in which we operate. We are committed to ensuring that people are treated with dignity and respect. We recognize that governments are ultimately responsible for establishing the legal framework to protect human rights within their jurisdictions. Central to our respect for human rights is our commitment to the rule of law and to compliance with the law wherever we operate. We expect our business partners, both internal and external, to have the same commitment. This policy is guided by, consistent with, and reflects the international human rights principles encompassed in the Universal Declaration of Human Rights, the International Labor Organization’s (“ILO”) Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact, the United Nations Guiding Principles on Business and Human Rights, and the Sustainable Development Goals (SDGs) approved by the member states of the United Nations.

2. Principles

- a) We respect and abide by internationally recognized human rights principles and are committed to treating people with dignity and respect, refraining from discriminatory practices, and protecting the rights of ethnic minorities and indigenous peoples.

- b) We respect employees' right to associate, form or join trade unions and workers' right to collective bargaining, subject to applicable law and regulations.
- c) As part of our commitment to human rights, we have established internal and external mechanisms to help identify, prevent, and mitigate adverse human rights impacts resulting from or caused by our business activities. In addition, Vineyard Wind will continue to look for ways to promote and advance human rights within our sphere of influence.
- d) We prohibit the use of child labor, forced labor, prison labor, slavery, and human trafficking.
- e) We are committed to treating all of our project team members with respect and dignity and cultivating inclusive diversity in the workplace. Our Corporate Governance System adheres to all applicable domestic laws and is consistent with the United Nations Guiding Principles on Business and Human Rights and the ILO core labor principles concerning freedom of association and collective bargaining, nondiscrimination, forced labor, and underage workers in the workplace.
- f) We recognize that we are part of a broader community wherever we operate. In the communities where we operate, we believe that engaging stakeholders—including those from more at-risk populations—is fundamental to our respect for human rights. Where practical, we are committed to dialogue and engagement with all relevant parties in an effort to understand, assess and address areas of concern as appropriate.
- g) We are committed to providing a safe and healthy workplace and complying with applicable safety and health laws, regulations and internal requirements.
- h) We are committed to maintaining a workplace that is free from violence, harassment, intimidation, and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for project team members are provided as needed and will be maintained with respect for project team member privacy and dignity.
- i) Training is an important part of effective human rights practices. We continue to work to build awareness about our human rights policies and procedures.
- j) In addition, we have adopted measures to detect human rights violations and, where appropriate, report such violations to the competent government authorities.
- k) All our suppliers are required to abide by the Supplier Code of Ethics, pursuant to which they are (i) prohibited from using forced labor, prison labor, child labor, slavery, and human trafficking and must develop the necessary measures to eliminate and prevent the use of forced labor, (ii) must adhere to all applicable domestic laws and are consistent with the United Nations Guiding Principles on

Business and Human Rights and the ILO core labor principles concerning freedom of association and collective bargaining, nondiscrimination, forced labor and underage workers in the workplace, and (iii) must refrain from engaging in discriminatory practices and treat all their employees in a manner that respects human rights.

- l) We endeavor to create workplaces in which open and honest communications among all project team members are valued and respected. If you believe that a conflict arises between the language of the policy and the laws, customs and practices of the place where you work, if you have questions about this policy or if you would like to report a potential violation of this policy, you should raise those questions and concerns through existing processes, which make every effort to maintain confidentiality. You may ask questions or report potential violations to your direct supervisor, members of senior management, Human Resources, or the Compliance Division. Employees can also report suspected violations through the Helpline secured website at www.avangrid.ethicspoint.com or by calling 887-606-9171. No reprisal or retaliatory action will be taken against any project team member for raising concerns under this Policy in good faith.

- m) We are committed to investigating, addressing and responding to the concerns of project team members and to taking appropriate corrective action in response to any violation.

Attachment 2

Stakeholder Engagement Prior to and Immediately Following Submission of the COP

Date	Group	Topic
April 2015	MA Task Force Meeting: BOEM, MassCEC, MA CZM, Tribes, Municipalities, USCG	General project information and updates
October 2015	Cape Light Compact Board (municipal aggregator representing 23 towns on the Cape & Islands), including representatives from: Aquinnah, Barnstable, Barnstable County, Bourne, Brewster, Chatham, Chilmark, Dennis, Dukes County, Eastham, Edgartown, Falmouth, Harwich, Mashpee, Oak Bluffs, Orleans, Provincetown, Sandwich, Tisbury, Truro, Wellfleet, West Tisbury, Yarmouth	General project information and updates
October 2015	Martha's Vineyard All-Island Selectmen's Meeting	General project information and updates
January 2016	Public Meeting: EEA, MassCEC, BOEM	Assessment activities for future offshore wind projects in Federal wind lease areas
June 2016	BOEM	Pre-survey meeting
June 2016	Mashpee Wampanoag Tribe-Tribal Historic Preservation Officer ("THPO")	Project introduction
June 2016	Wampanoag Tribe of Gay Head-THPO	General project introduction
July 2016	BOEM	Survey coordination
Date	Group	Topic
July 2016	Chilmark Board of Selectmen	General project information and updates including survey planning
July 2016	Edgartown Board of Selectmen	General project information and updates including survey planning
July 2016	Narragansett Indian Tribe-THPO	Pre-survey meeting
July 2016	Oak Bluffs Board of Selectmen	General project information and updates including survey planning
July 2016	Wampanoag Tribe of Gay Head and Mashpee Wampanoag Tribe-THPOs	Pre-survey meeting
July 2016	West Tisbury Board of Selectmen	General project information and updates including survey planning
August 2016	Aquinnah Board of Selectmen	General project information and updates including survey planning
August 2016	Martha's Vineyard Commission: Executive Director	General project information and updates including survey planning
August 2016	Wampanoag Tribe of Gay Head – Tribal Council	General project information and updates including survey planning
September 2016	Tisbury Board of Selectmen	General project information and updates including survey planning

Date	Group	Topic
November 2016	MA CZM and Massachusetts Clean Energy Center (“MassCEC”)	Update on local outreach
November 2016	Public Meeting: EEA, MassCEC, BOEM	Assessment activities for future offshore wind projects in Federal wind lease areas
December 2016	CCC	Project introduction
December 2016	Nantucket Board of Selectmen (2 meetings)	Project introduction, meeting was broadcasted on local TV
January 2017	Falmouth: Selectman, Assistant Town Manager, Town Manager, DPW	Project overview
March 2017	Barnstable: Town Manager, Assistant Town Attorney	Project overview and cable route discussion
March 2017	BOEM	Review study plans
March 2017	MA EFSB, EEA	Pre-permitting meeting
March 2017	Yarmouth: Town Manager, DPW Director	Project overview and cable route discussion
April 2017	BOEM (2 days)	COP preparation
April 2017	BOEM, National Oceanic and Atmospheric Administration, National Marine Fisheries Service (“NMFS”), Massachusetts Division of Marine Fisheries (“MA DMF”)	Project overview and reviewed existing site data provided by Vineyard Wind and additional data provided by NMFS.
Date	Group	Topic
April 2017	Mashpee: Town Manager, DPW Director, Conservation Agent	Project overview and cable routing
April 2017	Massachusetts Ocean Team (CZM, MEPA Office, MA DMF, Massachusetts Department of Environmental Protection [“MA DEP”], Massachusetts Bureau of Underwater Archaeology)	Cable survey work
May 2017	Army Corps of Engineers (USACE)	Project update and permitting planning
May 2017	BOEM	Review Certified Verification Agent (“CVA”) requirements
May 2017	BOEM	Pre-survey meeting
May 2017	MA and RI Joint Task Force Meeting: BOEM, MassCEC, MA Coastal Zone Management (“MA CZM”), Tribes, Municipalities, US Coast Guard(“USCG”)	Project update
May 2017	Martha’s Vineyard Commission: Executive Director	Project update
May 2017	Tisbury Board of Selectmen	Project overview, update
May 2017	US Fish and Wildlife Service (“USFWS”) and BOEM (Avian Study Plan)	Project update and reviewed study plans and available data
June 2017	Barnstable: Town Manager, Assistant Town Manager, Director of the Growth Management Dept., and Assistant Town Attorney	Project update and cable route discussion
June 2017	BOEM	COP preparation

Date	Group	Topic
June 2017	Chilmark Board of Selectmen	Project update and survey planning
June 2017	Edgartown Board of Selectmen	Project update and survey planning
June 2017	MA EFSB	Pre-permitting meeting
June 2017	Nantucket Board of Selectmen	Project update and cable route discussion
June 2017	Nantucket: DPW Director	Project update and cable route discussion
June 2017	Nantucket: Wastewater Treatment Director, Town Energy Manager	Project update and cable route discussion
June 2017	USCG	Project update and review draft project layout
June 2017	West Tisbury Board of Selectmen	Project update and survey planning
June 2017	Yarmouth: Town Manager, DPW Director	Project update and cable route discussion
July 2017	Aquinnah Board of Selectmen	General project information and updates including survey planning
July 2017	BOEM	COP preparation
July 2017	MA CZM	Survey planning
July 2017	MA DMF and MA CZM	Discussion on available data on fishing areas and gear types
July 2017	Oak Bluffs Board of Selectmen	Project update and survey planning
July 2017	Ocean Team (EEA, MA DEP, MA DMF, MA CZM)	Project update and survey planning
August 2017	BOEM	Review CVA scope
August 2017	EPA	Discuss Outer Continental Shelf Air Permit
August 2017	Mashpee Wampanoag Tribe (THPO)	Project update, survey planning, preliminary upland routing discussion
August 2017	USFWS, BOEM	Project update and avian discussion on COP needs
September 2017	BOEM	COP preparation
September 2017	MA DMF	Discussion on available data on fishing areas and gear types
September 2017	Massachusetts Department of Transportation, Highway and Rail Divisions	Project routing and construction techniques
September 2017	Nantucket Board of Selectmen	Project update, Section 106, visual impact assessment process and input request
September 2017	Nantucket: Rotary Club	Project update, visualizations, Section 106
September 2017	Rhode Island Department of Environmental Management, Division of Marine Fisheries	Discussion on available data on fishing areas and gear types and feedback on lessons learned for communication during construction.

September 2017	Nantucket	Visual impact assessment public meeting and request for input
October 2017	Barnstable Town Council	Project update and cable route discussion

Date	Group	Topic
October 2017	Barnstable: Town Manager, Director of Growth Management, Asst. Town Attorney, Asst. Town Manager, Leisure Service Director, Conservation Admin, Harbormaster, Department of Public Works (“DPW”) Director, Dir. Of Community Services, Town Attorney, Assessing Dept. Director	Project update and cable route discussion
October 2017	BOEM (4+ meetings)	COP preparation
October 2017	Martha’s Vineyard Commission: Executive Director, Regional Planner, Coastal Planner, Administrative Assistant	Project Update
Date	Group	Topic
October 2017	Nantucket: DPW Director	Project update
October 2017	Nantucket: Land Bank	Project introduction
October 2017	Nantucket: Planning and Economic Development Council	Project introduction
October 2017	Nantucket: Wannacomet Water Company	Project update
October 2017	NMFS - Fisheries division	Survey update and COP needs
October 2017	NMFS - Office of Protected Resources (ORP)	Incidental Harassment Authorization (IHA)
October 2017	USCG, BOEM	Navigation Risk Assessment discussion
October 2017	Yarmouth Board of Selectmen	Project update
October 2017	BOEM	Visual impact assessment preparation and alignment on key observation points
November 2017	Aquinnah Board of Selectmen	Project update
November 2017	BOEM	COP preparation
November 2017	Martha’s Vineyard Commission: Full Commission	Project update
November 2017	Mashpee Wampanoag Tribe (THPO)	Discuss upland route and visual simulations
November 2017	Mashpee Wampanoag Tribe-THPO	Discuss upland route and visual simulations
November 2017	Oak Bluffs Board of Selectmen	Project update
November 2017	Ocean Team (EEA, MassDEP, DMF, CZM, MEPA)	Project update
November 2017	Tisbury Board of Selectmen	Project update – letter of support request
November 2017	US Navy	Project update, discussion for COP
November 2017	Yarmouth Board of Selectmen	Public Hearing
November 2017	Nantucket: Madaket Matters, Madaket Residents Association	Project update, visual impact assessment process, Section 106
December 2017	BOEM (3+ meetings)	COP preparation
December 2017	Chilmark Board of Selectmen	Project update

Date	Group	Topic
December 2017	Edgartown Board of Selectmen	Project update
December 2017	MA EFSB	Pre-permitting meeting
December 2017	Nantucket Board of Selectmen	Project update
December 2017	West Tisbury Board of Selectmen	Project update
December 2017	Yarmouth: Department Heads	Project Update
January 2018	BOEM	COP survey discussion
January 2018	EPA	OCS Air Permit
January 2018	Mashpee Wampanoag Tribe (THPO)	Project update
Date	Group	Topic
January 2018	MEPA	Project update
January 2018	MEPA Consultation Sessions (Boston and Hyannis)	Public Meetings
January 2018	MEPA Office & CZM	Project update, ENF comments
January 2018	Rhode Island Coastal Resource Management Council	Project overview, discuss COP
January 2018	Yarmouth: Town Agent, Natural Resources Department	Lewis Bay
January 2018	Yarmouth: Zoning and Planning Officials	Zoning
January 2018	Yarmouth Board of Selectmen (2 meetings)	Project hearing on overview and community agreement
February 2018	Barnstable: Assistant Town Attorney	Project update
February 2018	BOEM (4+ meetings)	COP review discussion, pre-survey meeting (geophysical)
February 2018	Cape Light Compact: staff	Update on project
February 2018	Mashpee Wampanoag Tribe (THPO)	Upland route window survey
February 2018	Mashpee Wampanoag Tribe (THPO)	Pre-survey meeting
February 2018	NMFS, BOEM	Marine mammal discussions and COP
February 2018	USCG, BOEM	Navigation Risk Assessment
February 2018	USFWS, BOEM	Project update and avian discussion
February 2018	Wampanoag Tribe of Gay Head (THPO)	Pre-survey meeting
February 2018	Yarmouth: DNR Officer	Commercial and recreational shell-fishing.
February 2018	Yarmouth: Conservation Commission	Shellfish survey
March 2018	BOEM	Pre-survey meeting (geotechnical)
March 2018	BOEM	Discussion on acoustics
March 2018	BOEM	CVA discussion
March 2018	BOEM (and other federal and state agencies)	Interagency Meeting
March 2018	Marine Mammal Alliance Nantucket (MMAN)	General project information and updates
March 2018	Massachusetts NHESP	ENF Comment Letter

Date	Group	Topic
March 2018	Massachusetts Ocean Team (CZM, MEPA, MassDEP, MBUAR, DMF)	2018 survey
March 2018	Nantucket: Energy Committee	Visual simulations presentations, requests for input
March 2018	NMFS, BOEM	Marine mammal discussions and COP
March 2018	Ocean Team (EEA, MassDEP, DMF, CZM, MEPA)	Project update and 2018 survey plan
Date	Group	Topic
March 2018	Yarmouth Board of Selectmen	Project regulatory update
March 2018	Yarmouth Energy Committee	Project update and discussion
March 2018	Nantucket (3 meetings)	Publicly advertised open house to present visual simulations, Section 106 process, visual impact assessment presentation, and request for input
March 2018	Nantucket Board of Selectmen	Visual simulations presentations
March 2018	Yarmouth Shellfish Dept	Project details and shellfish impacts/mitigation
April 2018	BOEM	COP comments (2 meetings)
April 2018	BOEM (4 meetings [New Bedford, Hyannis, Nantucket, Martha's Vineyard])	Public scoping meetings, visual simulations presented
April 2018	DMF	ENF comment letter
April 2018	EPA (2 meetings)	OCS Air Permit
April 2018	MA EFSB	Site Visit and Public Hearing
April 2018	Massachusetts NHESP	Avian data discussion
April 2018	MEPA	Draft EIR responsiveness to Secretary's Scope
April 2018	NMFS, BOEM (2 meetings)	Marine mammal discussions, COP, and 2017/2018 survey review
April 2018	USACE	Buoy permit
April 2018	Yarmouth Natural Resources	Project permitting
May 2018	BOEM (2 meetings)	COP and CVA Discussion
May 2018	MA CZM (2 meetings)	Bi-weekly update call
May 2018	NMFS - ORP	IHA
June 2018	BOEM (6+ meetings)	COP discussion
June 2018	BOEM, Section 106 Consulting Groups	Section 106 update and consultation
June 2018	EPA	OCS Air Permit
June 2018	MA CZM (2 meetings)	Bi-weekly update call
June 2018	MA DEP	Project timeline and update, Permitting, considerations
June 2018	MA DMF	Discussion on MA State fishing gear loss procedures
June 2018	Rhode Island Coastal Resource Management Council	Consistency certification discussion
Date	Group	Topic

June 2018	Yarmouth Finance Committee	Project overview
July 2018	MA DMF	Discuss eelgrass survey procedures
July 2018	Yarmouth Shellfish Dept, DNR, Aquaculture, Commercial Shellfishermen	Project details