27 July 2006

Dear Sirs:

Both the magnitude of the proposed Cape Wind project as well as the potential duration the Wind Farm would exist on Nantucket Sounds requires a comprehensive Environmental Impact Statement (EIS). The previous EIS (draft) prepared by the Army Corp of Engineers (ACOE) was/is clearly inadequate and seriously flawed. I strongly recommend the Mineral Management Service establish a new baseline EIS, to examine the impact/merits of a Wind Farm. Reliance on data/information from the previous EIS (draft) is likely to adversely impact the decision making process and potentially lead to inaccurate conclusions. As such, I recommend you discard the previous documentation & data contained in the ACOE EIS and conduct your own independent data gathering and analysis. With that said, I believe the following items need to be addresses in the Mineral Management Service's Environmental Impact Statement:

1. The EIS need consider the long-term impact of a Wind Farm on Nantucket Farm. If permitted, the Wind Farm will likely become a fixture on the shores of Cape Cod for least twenty-five years and possibly much longer. The EIS needs to be forward looking and measure/quantify the impact it will have over the life cycle of the project. As you know, there has been tremendous population growth in Cape Cod over the past three decades and growth is likely to continue over the coming decades. With this, has come increased public use of Nantucket Sound for both recreational (fishing, shell fishing, boating) and commercial purposes (fishing, aquaculture, commercial transportation)? You must not only consider the immediate impact of the Wind Farm (1-5 year period), but also consider the long term implications the Wind Farm may have on the public's access /use of Nantucket Sound. For example, it is logical to assume that over the next 25 years there will be incremental growth in the use (recreational & commercial) more boats, more ferry service, more fisherman using the waters, more aquaculture, etc. The projected increase use of these waters by the public over the lifecycle of the Wind Farm needs to be considered in your EIS.

2. A major driver in Cape Cod's economy is derived from either directly or indirectly by tourism. I have been told that Cape Cod has one of the highest concentrations of restaurants per capita. in the Nation. People come to Cape Cod principally for the ocean…however spend their tourist dollars at our restaurants, clothing stores, etc. It is extremely important that you conduct a thorough analysis of the impact a large-scale commercial operation (Wind Farm) will have on the economy, particularly tourism. The previous EIS was woefully deficient is this area. For example, will the introduction of a 24 square mile commercial facility off the coast of Cotuit /Osterville and Mashpee impact summer rentals? Will the introduction of the Wind Farm impact restaurants revenues or impact sales at surrounding retail establishments? Will the introduction of a large commercial activity off the coast of Cotuit impact property values? These must be addresses in your EIS. This would have consequence to both individual property owner (home is typically the single largest investment for an individual) as well as potential consequences on property tax revenues that both the Towns of Barnstable and Mashpee. As a minimum, I would recommend that during any permitting process, the developer (Cape Wind) be required to compensate/indemnify individual landowners that incurred damages (reduced property values), businesses (loss of revenue) as well as Towns (reduced tax receipts) attributable to the introduction of the Facility.

3. I strongly recommend that you EIS include a comprehensive analysis on both noise (fog horns) and Wind Tower lights would have on the habitability and historicity of the surrounding communities. Each of the 130 towers will be outfitted with a series of navigation lights include strobe lights. You should require an accurate assessment of the impact this elaborate lighting scheme will have on recreation boaters and commercial fishing operating in the area. Additionally you need to consider the impact that noise pollution that foghorns will have on commercial and recreation fisherman operating in the area. You should require an accurate model of what the lighting scheme of the towers would look like from shore. It should be a model that accurately depicts the lighting of all 130 towers including the continual visual impact of the strobe lights. The model developed for the previous EIS (draft) was flawed in that it only showed snapshot/static display of the lighting scheme. Your should consider the impact of light & noise pollution on both boaters as well as shoreline communities.

4. You need to consider any consequences the introduction of 130 towers will have on navigation, including both recreational and commercial boating. Additionally you need to consider impacts the towers will have on commercial and recreation aircraft, including para-sailing. It is my understanding there are now concerns about the impact Wind Towers would have on air radar systems. Any impact the towers would have on commercial, military aviation safety must be considered. Additionally I believe we need to reexamine the impacts the Wind Farm would have on National Defense (PAVE/PAWS) radar systems.

5. Your EIS needs to consider the impact the Wind Towers would have on both current and future aquaculture operation. In particular, would the introduction of these towers lead to shoaling and/or impact safe navigation by recreational and commercial pursuits. Additionally your EIS needs to consider any navigation risk the proposed off shore sub station may have on boaters.

6. Your EIS needs to consider the impacts that dredging during cable installation as well as during installation of tower pilings would have on both commercial and recreational fishing/shell fishing. Your EIS must address pollution risk/concerns relation to petroleum products uses to maintain the Wind Towers, the Off Shore Sub Stations and any pollution threats related to dielectric fluids or similar materials uses to cool/insulate transmission lines.

7. Lastly I ask the EIS consider the impact that the introduction of the Wind farm would have on the quality of life, habitability, and historicity of Cape Cod. Historically Cape Cod has been resistant to large commercial operations. Unlike many communities, there are no high rises building on Cape Cod. The average height of a building is less than 20 feet. The proposed Wind Towers are approximately twenty five times higher than the average structure on Cape Cod. In fact, Cape Cod has been slow to accept (until very recently) large commercial retail and hardware stores. It is often near impossible to get local approvals for a 15-foot dock for a recreational boat on Nantucket sound. The magnitude of the Wind Farm is of far more consequence to the economy, culture, and quality of life of residents of Cape Cod. As such it deserves/requires the most comprehensive of analysis that considers both immediate and long term impacts on residents.

I appreciate the opportunity to provide you these comments and look forward to the next milestone in the review process.

D. Blackman