July 11, 2006

Minerals Management Service
381 Elden Street
MS 4042
Herndon, VA 20164

RE: Notice of Intent to propose an Environmental Impact Statement on the Cape Wind Project

Dear Sirs:

With the conclusion of the public comment period nearing a close on July 14, 2006 for the development of a programmatic Environmental Impact Statement (EIS) for the Cape Wind Project, et al, the members of the Cape Cod Marine Trades Association, Inc. (CCMTA) respectfully request that this comment period be extended to ensure that every opportunity has been given to the public to share their views and recommendations. We further request that a public comment session be held on Cape Cod to allow those citizens who are most burdened by Cape Wind's offshore wind project the opportunity to testify in person. Should you allow this, you will have given fair audience to those whose livelihoods are dependent upon the health and wellbeing of Nantucket Sound.

In the development of the programmatic EIS, it is essential that a rigorous and thorough review of the Cape Wind Project be required to protect the marine environment, ensure public safety, and protect the livelihoods and economic health of those who earn their living upon Nantucket Sound. In your development of a programmatic EIS, a fully detailed analysis of vessel traffic, navigation hazards, conflicting uses of the waterway, and radar interference are but a few of the many areas which must be reviewed and proved to be safe for navigation. All results within the EIS must be well documented and methodology presented to justify the results and conclusions of the study. Should a project's EIS fail to conclusively prove that vessel safety has not been compromised, than that project simply must be denied.

Nantucket Sound is one of the most popular boating areas on the east coast and is shared by high-speed ferries, commercial fishing boats, freight ships, sailing vessels, and other recreational boaters. Hazards within the sound are many and none more serious than the hazard of boating in the fog, which occurs on a fairly regular basis. Couple this natural phenomenon with shoals, swift currents, and choppy waters; boating in Nantucket Sound is often treacherous from its own natural causes without the additional hazards created by 130 windmills and switching station.

An EIS for an offshore wind project must incorporate a risk assessment model like the one established in the UK. Safe Separation Zones must be delineated between the wind turbines and the shipping channels. Ample boundaries must be established around the parameter of the complex to allow for the navigational safety of larger vessels which may have to perform tacking maneuvers due to weather conditions for the safety of the vessel's cargo and the comfort of their passengers.

The EIS must conclusively demonstrate that offshore wind complexes will not mask radar reception within and adjacent to the complex. It must demonstrate that boat traffic operating within the range of the complex can be accurately detected and identified by radar, and in addition, it must conclusively prove that the complex does not cause radar interference obliterating the detection of low flying aircraft.

In developing a meaningful programmatic EIS for the Cape Wind project, it is important to understand that all but a small portion of Nantucket Sound is navigable by vessels both large and small. Therefore, the EIS must require a complete analysis of the compatibility of the project to accommodate vessel traffic of all size. It must show that commercial fishing trawlers can safely operate within the area without risk of being hung up on a wind tower or catching its tow on an underground electric cable. It must also conclude that search and rescue operations may be accomplished within the area without endangering the lives of the rescuers, and most importantly, that air rescue can be safely accomplished within the area.

An analysis must be required of the Cape Wind Project to show the effects of ice flows within the area and how these flows will not amass into huge packs of sea ice inhibiting navigation across the sound. The document must show that during icing conditions, ice formed on the windmill blades will not endanger passing vessels, as ice chunks have the potential of being tossed from the blade tips in speeds in excess of 200 miles per hour.

The EIS for offshore wind projects must be conclusive and accurate. The reviewers must not allow "desk-top" analysis, and all conclusions must be backed by documentation. Clever verbiage to downplay the seriousness of a hazard must not be tolerated, and all comments must be scrutinized for accuracy. If an offshore wind project fails to guarantee safe navigation within an area, the project must be modified, moved to another locus, or flatly denied. Nothing less is acceptable.

On behalf of the members of the Cape Cod Marine Trades Association, I wish to thank you for this opportunity of commenting upon this important scoping study.

Sincerely yours,

Bob Butcher
President
Cape Cod Marine Trades Association
508-274-7559