

Dianne M. Muller & George J. Schepler
118 Bayview Circle
Osterville, Massachusetts
02655

004033

17 February, 2005

Ms. Karen Adams
Project Manager
Army Corps of Engineers
696 Virginia Road
Concord, MA 01742

Dear Ms. Adams:

We stand firmly opposed to the development of Nantucket Sound by Cape Wind Associates, and ask that you take the prevailing public view into account as you submit your final report.

Eliminating the emotional politics from consideration, we are concerned primarily about the following issues:

LAND USE: The use of public lands for private profit should only be considered when public welfare is directly threatened and such profiteering is the ONLY protective option.

RESPECT FOR LOCAL ZONING LAWS: We find it ironic that we cannot remodel our own home or cut down a tree, put a mooring in town waters or build a private dock because of local zoning restrictions. And yet 130 turbines and a 10-story transformer station are permissible? For private profit? Massachusetts has led the nation in ocean preservation and conservation, and we are shocked that the federal government would be so disrespectful of our State and local governments' ocean development policies.

COSTS AND BENEFITS TO LOCAL TAXPAYERS: Cape Wind's promotional material touts "production of up to 75% of the Cape's energy needs" but in the small print we see that energy will be diverted to the North East grid. So why consider such a heavily used body of water, other than cost efficiencies to Cape Wind?

PRECEDENT: We are homeowners and taxpayers in Massachusetts and Northern California. Despite a MASSIVE wind farm project covering miles of California farmland, California (land of rolling blackouts) has the highest energy prices in the U.S. What is the history and benefit of that farm? We know that it has been disastrous for the bird population.

PROTECTING NATURAL RESOURCES: One need only drive the highways of Southern California and Florida to see the blight and eyesores of offshore drilling platforms.

Adams, Karen K NAE

From: Al Weisz [aweisz@payette.com]
Sent: Wednesday, February 16, 2005 4:51 PM
To: Energy, Wind NAE
Subject: Cape Wind Mills

Y034

To Whom It May Concern:

The addition of the wind turbines to the grid would be a great addition to the long term sustainable energy goals of the state. Let's help to set a trend within the nation and reduce our need on foreign petroleum products.

Thank you,

al WEISZ AIA
architect
617.895.1214

Adams, Karen K NAE

From: Blue Gentian [bluegentian@adelphia.net]
Sent: Wednesday, February 16, 2005 4:45 PM
To: Energy, Wind NAE
Subject: Cape Wind Project Comments

Hello I would like to submit these comments in support of the Cape Wind project. I feel that the time has come for us to promote the use of renewable energy technologies for the generation of electricity. I think the availability of the vast wind resources offshore from the Cape provide a unique opportunity to demonstrate our commitment to reduce our reliance on fossil fuels for electrical generation. We have fed the fiscal appetites of the oil rich middle eastern countries for long enough. The fight against terrorism requires the starving of the terrorists not just the bombing of their homes. The objections I have heard of the Cape Wind project have exclusively come from wealthy residents 'close' to the project site who object to the thought of viewing rotating blades. I can understand their aesthetic objections but cannot hear any alternatives to burning fossil fuels from this group. Please don't let their 'money power' derail this project.

Thank you

004035

Adams, Karen K NAE

From: Comcast Mail [rba22@comcast.net]

Sent: Wednesday, February 16, 2005 5:07 PM

To: Energy, Wind NAE

Subject: I oppose the Cape Wind project

004030

I'm 100% against any kind of wind turbine farm off the Northeast coast of the UNITED STATES OF AMERICA. Sincerely, Robert B. Antonelli 355 Broadway Somerville, Massachusetts 02145

Adams, Karen K NAE

From: Michael Varallo [threekds@earthlink.net]
Sent: Wednesday, February 16, 2005 7:12 PM
To: Energy, Wind NAE
Subject: I oppose the Cape Wind project

New Jersey resident/Nantucket resident

004037

Boating in Nantucket sound is a tricky proposition at best!!!!

We travel between Hyannis and Nantucket frequently. We travel through wind fog and rough conditions. The good of this project cannot out weigh the difficulty it poses for the the recreational boater/angler. The sound and shoals are tough enough> Please cut the little some slack in calculating your data!!!!

--
Michael Varallo

Adams, Karen K NAE

From: needles@coastalnet.com
Sent: Wednesday, February 16, 2005 7:36 PM
To: Energy, Wind NAE
Subject: Wind Power

004038

Dear Army Corps. of Engineers.

I am a resident of coastal North Carolina and have been watching with much interest the way in which the Nantucket Sound Wind Farm has been hampered by political forces rather than factual scientific, economic, or environmental concerns.

Being a resident of coastal North Carolina, and realizing that the presence of wind farms a few miles off our own shoreline would improve our economy while providing pollution-free electricity, I am eager for you to approve the Nantucket Sound project.

Also, please move forward to create a permanent means by which the Army Corps. of Engineers can quickly approve wind farms for coastal North Carolina as well as other states along the seaboard.

It is well known that coal-fired power plants produce mercury and other toxins that have adverse influences on aquatic and marine life. This is of great concern for North Carolinians as much of our economy is driven by the fishing industry. Since wind energy provides pollution free electricity, power produced by wind farms will improve the health of all of our coast's marine life.

Additionally, the large towers that support the turbines provide a natural reef for fish to grow. Having hundreds of new reefs, a few miles off our coastline will create an economic boon for our fishermen.

The opponents of the Nantucket Sound farm have repeatedly claimed that Nantucket Sound is the most beautiful place on earth. I take great offense to this statement. Coastal North Carolina has beautifully clear warm waters and miles of pristine beaches. In my opinion, there is no place on the planet that is more beautiful. Having said that, I would be delighted to add hundreds windmills elegantly spinning on the distant horizon to my view as I walk the beaches watching sailing boats, shrimp trawlers, and Navy ships conducting Marine exercises, while knowing that these towers are improving the overall quality of life of my current and future generations of friends and family.

Please do not allow the political posturing and obstructionists methods of powerful Senators such as Ted Kennedy to block the economic progress and environmental welfare of coastal North Carolina.

Sincerely,
William Robinson
310 North Front St, #233
Wilmington, NC
28401

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Adams, Karen K NAE

From: Uzpurvis@aol.com
Sent: Wednesday, February 16, 2005 8:24 PM
To: Energy, Wind NAE; anne.canaday@state.ma.us
Subject: Comments for review

004039

Please use my attaced comments in the wind farm review process. Thankyou.

Nijole Uzpurvis
42 clifton Lane
Centerville, Ma. 02632
508-771-6660
uzpurvis@aol.com

Facts to consider about wind mill factory

The proposed plant may save oil, but it's insignificant. Electricity consumes about 2% of our total oil. Cars, SUV's and other transportation consume over 50% of the total oil. Let's be leaders and minimize use of gas-guzzlers to put a dent into the 50% oil segment. Ask our legislators for help to include the SUV's into the car category rather than truck category and thereby be required to meet car MPG goals.

Magnetic field or wave influence on radar is at best an open question. The British Government is convinced that there can be negative effects on radar and therefore prevent building of wind turbines in certain areas. The USA East Coast is monitored by PAVEPAWS radar at Otis Air Base. Do we dare to even think about interfering with our security? Remember the jets at 9/11 were scrambled from Otis Air Base.

The FAA says the wind plant will not interfere with air traffic. It is stated that commercial aircraft traffic path is at 700ft altitude in the area of the wind plant, at best that is 283ft above the tip of the wind turbine blades. Air lanes are separated by 2000 feet for safety. Why should the air traffic over the wind plant not have the same safety margin? What about the safety of private planes and helicopters which may not be guided by radar and rely on visual guidance? What about fog interference or failed safety lights at night?

Oil barges have spilled oil generally because of human error or equipment failure. Each wind turbine will have nearly 200 gallons of some type of lubricating oil. The transformer platform will have 40,000 gallons of cooling oil and 1000 gallons of diesel fuel. The oil reservoirs will be filled and maintained from a barge with a 70,000 gallon capacity and will need high pressure to deliver the oil to the points of use. Each time these oil reservoirs are filled, changed or maintained there are 132 chances of failure due to human error or equipment failure.

Wind is an intermittent source. The turbines only work when the wind blows at the right speed. If it blows too fast, the turbines are shut down for equipment safety. If it blows too slowly the turbines do not work. We will need to learn to live without electric power or we will have to buy power from other sources. To provide electricity power plants must stay operating and ready to serve our

needs. Shutting down other power plants seems to be out of the question.

Cape Wind claims creation of 200-400 jobs. These are most likely not for Cape Coders, because heavy industry skills are required, which the Cape lacks. This was evident at the Yarmouth Corps of Engineers hearing where designers and electricians, who spoke for the wind plant, were not from the Cape. Vacationers try to get away from industrial environments for rest and relaxation, and the Cape and Islands provide this. Because the wind factory will create an industrial environment there is an opportunity to lose recreational industry jobs. Studies have shown up to 2500 jobs. In addition we will lose some tourist business in the \$200 million range. Why take that risk for minimal gain?

The properties overlooking the Sound will certainly be affected by the view of the wind factory. Property values will decrease as indicated by studies. There is no wall protecting the inland properties from the same fate: decrease in value. The water front property values will decrease more than the inland properties shifting the tax burden to less affluent individuals. This is not just an issue for the wealthy. The Cape and Islands tax base will decrease resulting in lower tax collections in the towns. This will cause a reduction in services or a tax increase. We can not afford either.

There are many other concerns and facts, such as effects on birds, fish, whales, light and noise pollution and more.

Windmill factories are not acceptable and should not be built in areas affecting existing non-compatible industries, such as recreation. Windmill factories should be built in existing industrial or remote open areas.

The prime motivation for this project is greed—huge profit to an individual at the expense of the public. The saving of oil, protecting the environment, reducing pollution, innovations, using free energy and other reasons are just an excuse to justify individual profits. Please remember the profits will be paid by our taxes, and that would be legalized pocket picking.

Nijole Uzpurvis
Centerville, Ma.

Adams, Karen K NAE

From: ronnie mulligan [ronniemulligan@yahoo.com]
Sent: Wednesday, February 16, 2005 9:21 PM
To: Energy, Wind NAE
Subject: I oppose the Cape Wind project

004040

TO whom it may concern,

The Nantucket sound is very fragile and so are the fish and wildlife that live in it and count on it..

the sound should be protected and we need to preserve it for the people who come after us..once is is lost it is lost..

Please keep this a sacred place and a sanctuary..

Georgette Mulligan

email is Mulligan@yahoo.com

Do you Yahoo!?

Yahoo! Search presents - Jib Jab's 'Second Term'

Adams, Karen K NAE

From: John.Petersen@oberlin.edu on behalf of John Petersen [John.Petersen@oberlin.edu]
Sent: Wednesday, February 16, 2005 9:35 PM
To: Energy, Wind NAE
Subject: Cape Wind

Dear Madam/Sir:

Although the address at the end of this letter is in Ohio, I own a house in East Falmouth Mass (108 Seapit Rd) and an additional parcel of land on the Cape. As an environmental scientist and lover of the Cape, nothing would make me happier than to see this major wind project in Nantucket sound move forward. The Cape is extremely vulnerable to sea level rise induced by fossil-fuel driven climate change. I also believe that the structures will attract tourism.

Warm regards,

John Petersen
Associate Professor of Environmental Studies and Biology
Oberlin College, Lewis Center 122 Elm St.
Oberlin, OH 44074
Phone (440) 775-6692
FAX (440) 775-8946

004041

Adams, Karen K NAE

From: mike cusack [mike.cusack@comcast.net]
Sent: Wednesday, February 16, 2005 9:41 PM
To: Energy, Wind NAE
Cc: comments@saveoursound.org; DSVKOPE@aol.com
Subject: Opposition to the Cape Wind Project

004042

I would like to go on record as being opposed to the proposed Cape Wind Project. The majority of my reasons have been outlined & presented many times by Save Our Sound alliance to protect nantucket sound.

In addition, I oppose the project for the following reasons:

1. I do not believe the Army Corps of Engineers has legislatively been authorized/chartered to review/approve projects of this nature.
2. Cape Wind would potentially be utilizing vast tracts of state/federal waters with little or no public compensation.
3. The vaunted Denmark wind project testimonial has encountered multiple problems.
4. I believe Cape Wind's benefit analysis/ROI for public benefit is deliberately vague.
5. Subsidies, tax breaks & other taxpayer costs which will benefit Cape Wind have not been clearly identified & quantified.
6. The majority of Cape & Island residents, as well as the senior government leaders of the Commonwealth are opposed to the project - what more do you want?

I'm not opposed to wind power, but am opposed to the Cape Wind project.

Thank you.

Michael Cusack
P.O. Box 641
Mashpee, MA 02649
508.477.0718

Adams, Karen K NAE

From: icnisbet@cape.com
Sent: Wednesday, February 16, 2005 10:04 PM
To: Energy, Wind NAE
Cc: michael_amaral@fws.gov; jeff_spendelow@usgs.gov; carolyn.mostello@state.ma.us; jeremy.hatch@umb.edu; jcrawford@clf.org; sperkins@massaudubon.org; icnisbet@cape.com
Subject: Revised comments on Cape Wind DEIS



Revisions to
Comments on Cape .

Dear Ms Adams:

004043

My attention has been drawn to two errors in the comments on the Cape Wind Energy DEIS that I sent to you on 29 January 2005. Accordingly, I have revised two sections of those comments, those numbered 8(c) and 8(e). I attach a Word file containing the revised versions of these sections. Please replace the original sections 8(c) and 8(e) with the revised versions.

Sincerely,

Ian C.T. Nisbet, Ph.D.

Revisions to Comments on Cape Wind Energy DEIS-DEIR

By Ian C.T. Nisbet, Ph.D.

Revisions submitted on 17 February 2005.

8. Radar Studies.

(c) *Estimates of Target Density.* Table 3 in Appendix 5.7-E presents seasonal averages of “Tracks per hour”. This metric is stated to be “roughly equal to **birds** tracked within the 8 nautical mile (14.8 km) area within which the TracScan radar registered birds (out to about a 4 nautical miles [7.4 km] from the radar” (emphasis added). It appears to have been assumed (a) that targets can be equated with birds; and (b) that all birds within the 7.4 km circle were detected. The first assumption is known to be wrong: many of the birds detected and reported in the aerial and boat surveys were in flocks, each of which would have been detected as a single target. The second assumption is very unlikely to be true, for three reasons:

(i) the power density in the beam declines with the angle off-axis, so that targets at angles between 3° and 15.5° above the horizontal are progressively less likely to be detected; this would limit the detection of small targets at close range (3° and 15.5° above the horizontal correspond to altitudes of 52 and 222 m at a range of 1 km); this would also be true for birds below the beam axis (e.g., all birds flying at rotor height at ranges greater than about 2.8 km);

(ii) targets above the upper margin of the radar beam (15.5° above horizontal) would not be detected at all;

(iii) even close to the axis of the beam, distant targets would not be detected because they return echoes too weak to be registered.

To relate the numbers of targets detected to the numbers of targets in the air as functions of radar cross-section, altitude and range, would require calibrated information on the performance of the radar equipment, including polar diagrams of the dependence of the minimum detectable radar cross-section on the off-axis angle. Appendices 5.7-E and –J present no useful performance information except the statement that “TracScan’s operational detection range for large birds (i.e. geese) is over 10 nmi (18.5 km)”. Assuming that detection range scales approximately as $\text{mass}^{0.25}$, the “operational detection range” for a 10-g bird would be about 4.1 km, and that for a 100-g bird would be about 7.4 km. Detection ranges would be smaller for targets off-axis. This rough calculation suggests that many small and some medium-sized birds would have been missed in the outer parts of the scanned circle.

For all these reasons, the numbers listed as “Tracks per hour” in Table 3 are likely to be substantial underestimates. These numbers cannot be used as estimates of the numbers of birds passing per hour without correction for the geometrical biases pointed out above, and factoring in data on average flock size.

(e) *Heights of flight.* Summary statistics on the altitudes at which targets were detected by the VerCat radar are presented in Attachments 3 and 4 of Appendix 5.7-E. Because the data presented are simple counts of targets falling into various categories, these data evidently have not been converted to target densities or otherwise corrected for differential detectability. However, because the radar beam spreads linearly, birds flying low are less likely to be detected than birds flying at moderate altitudes. Birds flying very high are also less likely to be detected because the “typical operation range” is only 1,375 m downrange and 2,750 m vertically. As for the TracScan radar, the data cannot be interpreted or used for risk assessment without calibrated information on the performance of the radar equipment, including polar diagrams of the dependence of the minimum detectable radar cross-section on the off-axis angle. An additional feature of the VerCat radar is that the way in which its beam was rotated in a vertical plane is expected leads to differential detectability of birds flying in different directions. Specifically, birds flying north-south (perpendicular to the plane swept out by the beam), are less likely to be detected than birds flying east-west, because they will pass through the volume swept out by the beam too rapidly to be registered the minimum of three times to be recorded as a “target”. Again, precise calculations of this directional effect would require technical information on the ability of the radar to detect targets of various magnitudes at various off-axis angles. However, a rough calculation based on the nominal 20° beam width suggests that many or most birds flying north-south at rotor height within 500 m horizontal distance from the radar site would be missed for this reason. All these effects need to be corrected for before the data from the VerCat radar can be used to assess numbers or proportions of targets flying at rotor height.

The limited technical information given in Appendix 5.7-J defies rational interpretation. Page 6 states that a minimum of 3 registrations were required to record a “track”. A bird flying at 40 km/hr (ground speed) will travel 56 m in 2 revolutions of the VerCat beam (5 sec). At a nominal 1° beam width, the beam does not reach 56 m width until 3,180 m from the source, far beyond the typical operating range. Thus, according to information given, the VerCat radar could not detect any tracks of birds passing overhead except for birds flying in the plane swept out by the radar beam (stated to be east-west). At oblique angles, detectability will be higher. However, even at a 15° angle, the beam does not reach 56 m width until 3,070 m horizontally

from the source (820 m altitude); again, no birds would be detected except those flying in or near the east-west plane. At all angles, the VerCat radar will detect few birds flying north-south and far more birds flying east-west than NW-SE or NE-SW; at all angles, it will detect far more birds flying high than flying low, up to the heights where high-flying birds are lost because they are out of range. Because of these geometric properties of the VerCat radar, the data presented in Attachments 3 and 4 **cannot be used** to make inferences about the proportions or numbers of birds flying in the rotor-swept-zone, unless and until they have been corrected for the large variations in detectability according to target size, height, and ground speed.

21 Moon Street, #3
Boston, MA 02113
February 23, 2005

Karen Kirk Adams
Cape Wind Energy Project EIS Manager
Regulatory Division
New England District
U.S. Army Corps of Engineers
696 Virginia Road
Concord, MA 01742-2751

004044

Re: NAE-2004-338-1: Cape Wind Energy Project DEIS

Dear Ms. Adams:

I am writing to express my strong support for both the proposed Cape Wind Energy Project and for the thoughtful and exhaustive regulatory review process developed by the U.S. Army Corps of Engineers (Corps) to evaluate the project's Section 10/404 license application.

I first became aware of the proposed Cape Wind project in my former capacity of Project Review Coordinator for the Massachusetts Office of Coastal Zone Management (CZM). Because the project had the potential to present new federal consistency issues and because of my experience in evaluating other large energy projects in Massachusetts, I became CZM's project manager for the federal consistency review of Cape Wind. I have since retired from that position but have continued to follow the development of the Draft Environmental Impact Statement (DEIS) as I trained my successor and, as a private citizen, through the media, and by reading the DEIS.

As we all know, the Cape Wind proposal is a first for Massachusetts and for the United States. All of the regulators worked diligently to understand the technology of offshore wind generation, the siting issues associated with the development of such a project, and the direct and comparative environmental impacts of a wind generation project. It is to the Corps' very great credit that it provided many opportunities for state and federal agencies to learn about these issues by communicating with developers and regulators of similar projects in Europe and offering technical seminars by unbiased experts to all involved in the review of this project.

During the preparation of the DEIS, 17 state and federal agencies participated in negotiations to develop a statement of project purpose and need, a scope for the DEIS, criteria for an alternatives analysis, and identified numerous potential environmental impacts for further review. Because of the individual perspective of each of these 17 agencies, not all have totally agreed with the outcome of these discussions, but none can say that their viewpoints were ignored. The project purpose and need, and related scope

and analysis presented in the DEIS are appropriate within the context of the Corps and the National Environmental Policy Act (NEPA regulatory requirements).

I have also been impressed by the extensive environmental research undertaken by Cape Wind in support of this application. The work has already contributed a great deal to our knowledge of the Nantucket Sound environment.

Given both the state's and the nation's increasing appetite for electrical energy, I believe that it is critical that alternative energy projects such as Cape Wind be developed. The most significant source of adverse environmental effects from conventional electrical generating facilities is air emissions and wind power projects have no air emissions. When compared to injuries to human, plant and animal health caused by the combustion of fossil fuels, the environmental damage of a large wind energy project is minimal.

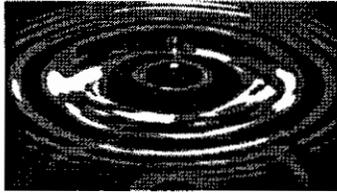
It has been argued that the visual effect of 130 turbines in Nantucket Sound will turn a pristine ocean viewshed into an industrialized zone. I am a past member of the Martha's Vineyard Commission and, as such, traveled by boat across the Sound several times a month – unfortunately, the quality of the Nantucket Sound viewshed is already badly affected by particulates in the air, and continued reliance on fossil fuels for electric power generation will further degrade the vistas of Nantucket Sound.

Given the current level of wind generation technology, Nantucket Sound is an appropriate location for the type of project proposed by reason of wind strength, sea depth, and proximity to transmission systems and markets.

Thank you for the opportunity to comment on the proposed Cape Wind project.

Very truly yours,

Jane W. Mead



Nancy J. Wheatley
WATER RESOURCES STRATEGIES
PO Box 873, Siasconset MA 02564
njwheatley@aol.com / 508 257-6643 / 617 417-9377

February 16, 2005

U.S. Army Corps of Engineers
New England District
696 Virginia Road
Concord, MA 01742
Attn: Karen Kirk Adams

004045

Secretary Ellen Roy Herzfelder
Executive Office of Environmental Affairs
Environmental Policy Act Office
Attn: Anne Canaday
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Cape Wind Energy EIS Project

I am writing in support of the Cape Wind Energy project proposed for Nantucket Sound on the day that the Kyoto Protocols become effective and another major typhoon is threatening islands in the Pacific. Both of these events highlight the importance of beginning to reduce our use of fossil fuels to generate energy. While this project is not a silver bullet which will reverse the degradation of air quality or stop global warming in its tracks, it is a major step. It demonstrates that it is possible to plan for responsible use of alternative energy sources.

Many will argue in commenting on the draft EIS that, by itself, this project will have only limited environmental and public health benefits. While this is true, it is true of virtually any single project. Unacceptable levels of pollution generally occur when individual small discharges to the environment overwhelm the ability of nature to absorb these pollutants. In other words, we create pollution through many small acts, and we can only begin to reduce pollution by taking similar small steps. To reiterate, first steps are needed, and the Cape Wind project provides a first step.

Our laws and public policy allow for review of major projects that will impact our environment, both for benefits and harm. The current law establishes an environmental review process based on a draft EIS, public review and response to those public comments. In my view, the draft EIS identifies meaningful environmental and health benefits that will be provided by the project, while demonstrating that adverse impacts are generally limited. While I am not an expert on the many technical areas which were studied, my review of the EIS suggests that it was done competently.

That is not to say that there are no questions to be raised about the report's conclusions. However, comments either supporting or questioning the validity of the EIS should be based on facts. There has been some criticism of the fact that Cape Wind provided funding for the studies. This is part of the process which is in place. The public should not be asked to fund evaluation of a private developer's project. Reports which are funded by interested parties, whether the project proponent or project opponents, are not automatically flawed. In sum, comments on the merits or flaws of any study should be based on sound technical analysis.

Opponents of the project have raised questions about Cape Wind as a private developer. In our free enterprise society, energy development projects are planned, promoted and implemented by private developers. Vilifying private enterprise may arouse passions, but it adds nothing to the understanding of the project. These comments should not be considered as part of the environmental review. Any project must be reviewed based on existing law, not on the law that either opponents or proponent wished existed.

Summarizing my observations on the draft EIS:

- The environmental review process is moving forward well, with interested parties able to review studies and raise questions and concerns about the potential impacts from the project.
- On the side of negative environmental impacts, the draft EIS identifies mostly, limited short term impacts from construction of the project.
- On the positive side, the draft EIS does not find that permanent disruption of the environment or the wildlife which depends on that environment.
- The most controversial aspect of the project is the visual impact. Changes in the "view" are almost exclusively subjective, with the benefits or problems in the eye of the beholder, and the impacts on tourism and property values highly speculative, with absolutely no objective evidence of harm and some limited evidence of benefit, from Europe and California.

Fundamentally, the way to improve the environment and public health is to begin to reduce the use of fossil fuels. This project, supported by the analysis of the draft EIS, is a powerful statement that achieving that goal – by making a change to renewable energy sources – is within our grasp.

Respectfully submitted,



Nancy J. Wheatley

Adams, Karen K NAE

From: Tony Uzabel [TUzabel@northernpower.com]
Sent: Thursday, February 17, 2005 9:00 AM
To: Energy, Wind NAE
Cc: Peter Edlund
Subject: Cape Wind project

To whom it may concern:

We just wanted to add our voices in support of the Cape Wind project. If this is not an example of the type of forward thinking needed to provide tomorrow's energy, then we don't know what would be. What could be better than a virtually zero impact generating system? The only arguments against it are of the NIMBY (Not In My Back Yard) variety.

While there are many types of technology for renewable and clean energy generation, wind is the only one that is 'ready for prime time'. The simple fact that the Cape Wind project could compete with traditional generating plants, on a purely economic basis, speaks volumes.

We believe it is past time that the United States take alternate/renewable energy seriously. Approving the Cape Wind project would communicate to the world that we are now doing so. More importantly, providing clean, reliable, and inexpensive power during a time of certain price increases in traditional fossil fuel power generation would benefit everyone involved.

Thank you for taking the time to listen to our comments.

Sincerely,

Tony Uzabel
Peter Edlund

Northern Power Systems
182 Mad River Park
Waitsfield, VT 05673-0999
802.496.2955

www.northernpower.com

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004046

Adams, Karen K NAE

From: Brett Maxwell [BMaxwell@northernpower.com]
Sent: Thursday, February 17, 2005 9:55 AM
To: Energy, Wind NAE
Subject: Support for Cape Cod wind project

004047

U.S. Army Corps of Engineers New England District
Cape Wind Energy EIS Project
Attn: Karen Kirk Adams
696 Virginia Road
Concord, MA 01742

Hi there,

I just want register my support for this project. It is the most forward looking, thoughtful, and responsible use of the public trust that I have seen proposed in many years. I'm an ex-Cape Codder who lived in Falmouth for more than 20 years, so I'm well aware of the air pollution problems that exist due to the tail-pipe effect exhausting our nation's coal-fired dirty air out to sea, and I'm well aware of the ocean pollution from various oils spills in Buzzard's Bay over the decades, including the most recent spill of oil on the way to the inefficient oil burning generator at the north end of the canal.

This project improves local health, energy and national security, improves local fisheries (especially so if we can stop spilling oil in our shellfish grounds), and just wait and see--it will be a net plus for tourist dollars to the Cape once it is up and running. People will be amazed and proud of our ingenuity at capturing useful clean energy at existing market prices perpetually.

With a degree in Economics, as well as graduate study in Energy Management under my belt, and with real world experience in my job at Northern Power Systems in providing electricity generation systems that often include renewables such as wind and solar informing my reasoning, I feel strongly that this is a good proposal, and it should go forward.

Please make this project happen. It will be a springboard for other similar proposals around this big electricity hungry country, and that is good for all of us for many, many reasons.

Thank you for your consideration.

Brett Maxwell
PO Box 795
Richmond, VT 05477

ph. 802-434-4128
brettmaxwell@adelphia.net

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Adams, Karen K NAE

From: Daniel Ruben [dan_ruben@usa.net]
Sent: Thursday, February 17, 2005 10:34 AM
To: Energy, Wind NAE
Subject: Please Support the Cape Wind Project!

004048

Dear Ms. Adams,

I urge you to approve the Cape Wind project in Nantucket Sound, as soon as possible, for the following reasons:

- The U.S. and the world must take bold steps to address the build up of greenhouse gases that cause global warming.
- The project will be a great demonstration that we can make a difference in fighting global warming. It will inspire others around the country to take action.
- The Cape Wind turbines will preclude the need for another polluting power plant.
- The project will make New England less dependent on natural gas and oil, diversifying our energy mix and providing economic stability.
- The project will reduce the risk of oil spills.
- Wind power creates more jobs than fossil fuel plants.

Thank you for giving me this opportunity to comment.

Sincerely,

Dan Ruben

Daniel Ruben
175 Auburn Street
Newton, MA 02466
dan_ruben@usa.net
617-527-7950

Adams, Karen K NAE

From: Rita0069@aol.com
Sent: Thursday, February 17, 2005 11:11 AM
To: Energy, Wind NAE
Subject: I oppose the Cape Wind project

Please take note of my very strong opposition to the Cape Wind project.

Rita Cuker
20 Young Road
Weston, MA 02493

004049

Adams, Karen K NAE

From: Rita0069@aol.com
Sent: Thursday, February 17, 2005 11:11 AM
To: Energy, Wind NAE
Subject: I oppose the Cape Wind project

I strongly oppose the Cape Wind project.

George Cuker
20 Young Road
Weston, MA 02493

004050

Adams, Karen K NAE

From: Cathy Boles [heathersblooming@charter.net]
Sent: Thursday, February 17, 2005 11:39 AM
To: Energy, Wind NAE
Subject: Nantucket Sound project

004051

Dear Army Corps. of Engineers:

I am a resident of coastal North Carolina and have been watching with much interest the way in which the Nantucket Sound Wind Farm has been hampered by political forces rather than factual scientific, economic, or environmental concerns.

Being a resident of coastal North Carolina, and realizing that the presence of wind farms a few miles off our own shoreline would improve our economy while providing pollution-free electricity, I am eager for you to approve the Nantucket Sound project.

Also, please move forward to create a permanent means by which the Army Corps. of Engineers can quickly approve wind farms for coastal North Carolina as well as other states along the seaboard.

It is well known that coal-fired power plants produce mercury and other toxins that have adverse influences on aquatic and marine life. This is of great concern for North Carolinians as much of our economy is driven by the fishing industry. Since wind energy provides pollution free electricity, power produced by wind farms will improve the health of all of our coast's marine life.

Additionally, the large towers that support the turbines provide a natural reef for fish to grow. Having hundreds of new reefs, a few miles off our coastline will create an economic boon for our fishermen.

The opponents of the Nantucket Sound farm have repeatedly claimed that Nantucket Sound is the most beautiful place on earth. I take great offense to this statement. Coastal North Carolina has beautifully clear warm waters and miles of pristine beaches. In my opinion, there is no place on the planet that is more

2/28/2005

beautiful. Having said that, I would be delighted to add hundreds windmills elegantly spinning on the distant horizon to my view as I walk the beaches watching sailing boats, shrimp trawlers, and Navy ships conducting Marine exercises, while knowing that these towers are improving the overall quality of life of my current and future generations of friends and family.

Please do not allow the political posturing and obstructionists methods of powerful Senators such as Ted Kennedy to block the economic progress and environmental welfare of coastal North Carolina.

**Sincerely,
Cathy Boles
Hampstead, NC 28443**

Adams, Karen K NAE

From: Richard Andrews [techcomm@vermontel.net]
Sent: Thursday, February 17, 2005 11:59 AM
To: Energy, Wind NAE
Subject: Cape Wind Project

I wish to register my support for the Cape Wind Project.

The 420 megawatts this project could produce at full capacity would be a valuable addition to the New England power grid. It would be a major step in the right direction in reducing emissions of greenhouse gases that lead to undesirable climate change, and the project would reduce reliance on imported fuels.

Richard Andrews
12 Center Street
Springfield Vermont 05156

--
No virus found in this outgoing message.
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Version: 7.0.300 / Virus Database: 265.8.8 - Release Date: 2/14/05

004052

Adams, Karen K NAE

From: Brett Pingree [BPingree@northernpower.com]
Sent: Thursday, February 17, 2005 12:23 PM
To: Energy, Wind NAE
Subject: Please implement the Cape Wind Farm

I strongly believe this wind farm is the correct use of the natural resources in the public, common, good. These turbines produce clean electricity with very little known detriment to the environment which will offset polluting and carcinogenic fossil fuel use.

004053

Please consider my vote as a Massachusetts resident as a vote of approval and confidence in the Cape Wind Farms.

Thank you,

Brett

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Adams, Karen K NAE

From: Linda Jackson [ljackson@ec.rr.com]
Sent: Thursday, February 17, 2005 12:25 PM
To: Energy, Wind NAE
Subject: wind energy

Dear Army Corps. of Engineers:

I am a resident of coastal North Carolina and have been watching with much interest the way in which the Nantucket Sound Wind Farm has been hampered by political forces rather than factual scientific, economic, or environmental concerns.

004054

Being a resident of coastal North Carolina, and realizing that the presence of wind farms a few miles off our own shoreline would improve our economy while providing pollution-free electricity, I am eager for you to approve the Nantucket Sound project.

Also, please move forward to create a permanent means by which the Army Corps. of Engineers can quickly approve wind farms for coastal North Carolina as well as other states along the seaboard.

It is well known that coal-fired power plants produce mercury and other toxins that have adverse influences on aquatic and marine life. This is of great concern for North Carolinians as much of our economy is driven by the fishing industry. Since wind energy provides pollution free electricity, power produced by wind farms will improve the health of all of our coast's marine life.

Additionally, the large towers that support the turbines provide a natural reef for fish to grow. Having hundreds of new reefs, a few miles off our coastline will create an economic boon for our fishermen.

The opponents of the Nantucket Sound farm have repeatedly claimed that Nantucket Sound is the most beautiful place on earth. I take great offense to this statement. Coastal North Carolina has beautifully clear warm waters and miles of pristine beaches. In my opinion, there is no place on the planet that is more beautiful. Having said that, I would be delighted to add hundreds of windmills elegantly spinning on the distant horizon to my view as I walk the beaches watching sailing boats, shrimp trawlers, and Navy ships conducting Marine exercises, while knowing that these towers are improving the overall quality of life

2/28/2005

of my current and future generations of friends and family.

Please do not allow the political posturing and obstructionists methods of powerful Senators such as Ted Kennedy to block the economic progress and environmental welfare of coastal North Carolina.

Sincerely,
Linda & Reggie Jackson
2005 E. Oak Island Drive
Oak Island, NC 28465

Adams, Karen K NAE

From: URSULA LEAHY [ruleahy@msn.com]
Sent: Thursday, February 17, 2005 12:29 PM
To: Energy, Wind NAE
Subject: Cape Wind project

004055

To: Karen K. Adams
Cape Wind Energy Project EIS Manager
U.S. Army Corps of Engineers, NE District

Re: Cape Wind project

Dear Ms. Adams,

As a former Conservation Commission member (9 years, Wilmington, MA), I feel strongly that the Cape Wind project is inappropriate for Nantucket Sound and for any offshore Cape Cod waters. I understand there are several more projects, just waiting to see if Cape Wind is approved, which will leave Cape Cod surrounded by more than 500+ windmills. An approval for Cape Wind will open a Pandora's Box, difficult to close.

I have seen a much smaller working windmill project in Holland from aboard a ship. As the day was cloudy and the windmills were almost silent, they loomed up in the distance and were not able to be seen until we were quite close to them. We had to navigate very slowly and carefully through the area. As you know, Cape Cod Bay and Nantucket Sound are major shipping, ferry and pleasure craft areas. We also have a large share of cloudy, stormy weather and it concerns me as to the safety of those using the waters.

From an environmental view, the windmills still use oil for transformers which will be located in the Sound, and must be connected to the mainland at some point and then to a power producing facility. Although wind energy can be considered a cleaner source of energy, it still needs the aid of fossil fuels. Buzzard's Bay has just suffered a major oil spill and is still recovering. This project would have a spill potential at the base of each and every windmill.

Economically the project is unsound, as it will not produce enough electricity to make a significant difference. Historically, windmill projects have not been financially profitable and are generally subsidized by the taxpayers. Many fairly new windmill projects are already being dismantled.

I see Cape Wind as an industrial power plant using Nantucket Sound as it's de facto "private" property. The economy of the Cape area is based on tourism providing open access to the ocean and beautiful vistas. As I see it, windmills will interfere with the ability to use our waters fully, as well as aesthetically ruining the horizon view.

I am not anti-wind power as another power producing source. I just don't believe it should be located in the waters of Nantucket Sound or Cape Cod Bay. It would be more appropriately located on land, where the windmills could be monitored closely.

Sincerely,
Ursula M. Leahy

Adams, Karen K NAE

From: GAMessier@aol.com
Sent: Thursday, February 17, 2005 2:22 PM
To: Energy, Wind NAE
Subject: Cape Wind

004050

Ladies & Gentlemen -

The advantages outweigh the disadvantages.

- Increased availability of low-cost energy from domestic, environmentally clean and friendly sources.

This has to outweigh domestic politics, geopolitics, NIMBY, and nay sayers.

Let's build it.

Respectfully,

George A. Messier
Wallingford, CT 06492

Adams, Karen K NAE

From: Marlene Bartos [marlene@yessian.com]
Sent: Thursday, February 17, 2005 2:16 PM
To: Energy, Wind NAE; anne.canaday@state.ma.us
Subject: Cape Wind

004057

I am writing in regard to the Cape Wind Draft Environmental Impact Statement. I have a home on Cape Cod and I am concerned that the statement is inadequate in a number of areas which include boat navigation and safety (I am an avid paddler and sailor), pollution threats from the substation (which oil, noise, and visual pollution) and the associated impact on tourism and the economic health of the area.

The statement also does not cover real analysis of alternative sites. I am a firm believer in finding alternatives to the use of fossile fuels, however, I don't believe this study has fully explored all the negative impact or any good alternatives.

Thank you.

Marlene Bartos
31 Crowell Rd.
West Yarmouth, MA
02673

Adams, Karen K NAE

From: Joan Peterson [cjpete@cape.com]
Sent: Thursday, February 17, 2005 3:05 PM
To: Energy, Wind NAE
Subject: I oppose the Cape Wind project

004058

My objections to the proposed wind farm are:

1. It would amount to the destruction of an irreplaceable natural treasure. The visual effect on a limitless horizon, the noise of the construction and the light pollution alone will render Nantucket Sound an eyesore. This will drastically affect tourism, on which Cape Cod heavily depends. Those who came to live on the Cape in order to be close to the ocean and its beauty and serenity will no longer have that benefit.
2. The minimal saving of fossil energy is more than offset by the environmental damage that would be caused and the damage that arguably could be caused by accident or storm damage.
3. The amount of power generated is not enough to justify the negative impact it would cause.

The rest of Massachusetts has weighed in in favor of this project because of their perceived benefit. They will not be adversely affected - we will bear the brunt of all the negative effects.

Sincerely, Joan Peterson, South Dennis, MA

Adams, Karen K NAE

From: SMacD@aol.com
Sent: Thursday, February 17, 2005 4:24 PM
To: Energy, Wind NAE
Subject: I oppose the Cape Wind project

004059

Please do not allow this private enterprise to destroy a unique and precious body of water.

Sandy MacDonald

Adams, Karen K NAE

From: Eric Benedict [madrivereric@yahoo.com]
Sent: Thursday, February 17, 2005 4:47 PM
To: Energy, Wind NAE
Subject: A letter of support for the Cape Wind project

U.S. Army Corps of Engineers, New England District
Cape Wind Energy EIS Project
Attn: Karen Kirk Adams
696 Virginia Road Concord, MA 01742

004060

Dear Ms. Adams,

I am writing this letter to indicate my support for the Cape Wind off shore wind project. I write this letter because I strongly believe that this (and other off-shore wind turbine projects) are a very important part of our energy future supplies and should proceed to completion as soon as possible. We are rapidly running out of time (if we haven't already) to build enough renewable energy resources and this project will help provide some additional resources. I also would like to mention that I am an avid sailor and feel that this project will not adversely affect sailors and other recreational boating activities.

Sincerely yours,

Eric L. Benedict, PhD.
11 Upper Sunnybrook Rd
Middlesex, VT 05602

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http://info.mail.yahoo.com/mail_250

Adams, Karen K NAE

From: EKaz88@aol.com
Sent: Thursday, February 17, 2005 5:25 PM
To: Energy, Wind NAE
Cc: ohmanjon@comcast.net
Subject: Cape Cod Wind Farm

004061

Dear Army Core of Engineers:

I am writing to express my concerns regarding the possible approval of a Wind Farm in Nantucket Sound. My concerns are on many levels and are important to me because my family spends a lot of time boating and fishing where the Wind Farm is proposed. My concerns include:

1. The destruction, in my opinion, of the natural beauty of Nantucket Sound by the placement of windmills and supporting structures and facilities in the middle of this beautiful, natural marine landscape.
2. The possible adverse effect on the marine and other wildlife that inhabit or pass through the area. I have read nothing that would lead me to believe that these structures would improve the environment for marine life etc. The most likely scenario is that some marine and bird life would be at risk.
3. The adverse impact on the economy of Cape Cod by placing an industrial complex in the middle of beautiful public territory. Perhaps there would be some curiosity visitors for awhile but I find it hard to imagine that they would make up for the loss of economic activity that the Cape might suffer by decreasing numbers of visitors who have for generations been attracted to the Cape to enjoy its natural beauty.
4. The possibility that the Wind Farm might not work well enough to reduce dependence on other sources of energy to any significant degree compared to the possible problems that could be created. Also, there is concern that the Cape might not benefit from any possible energy savings that might be created by the Wind Farm.
5. The risk imposed by the Wind Farm structures to the people who enjoy the Sound for recreational activities. This is my largest concern as I have spent considerable time on those waters with my family. I certainly would be concerned that the placement of numerous additional hazards to boating, and perhaps aviation, would certainly increase the possibility of more accidents to the smaller boaters in the fog. This is a real issue that will almost certainly occur and this maze of structures will make it much more difficult to render assistance when needed in urgent situations. I doubt that in any areas where reasonable zoning regulations already exist there would be allowed the placement of potentially very dangerous objects in an area that might be considered the equivalent of a public park.
6. The last concern is that a small group of private investors will potentially benefit by using public land in a way that would most likely adversely affect many people in many ways for many years. I would hope that the concerns of the people opposed to this project will be given serious consideration. There seems to be a lot of potential problems for many relative to the possibility of a small benefit for a few people if this project is built. Because of that, I would like to state that I am very much opposed to the Cape Wind Project.

Sincerely,
Edward L. Kazarian
15 Newton Street
Northborough, MA

Adams, Karen K NAE

From: Ken & Carol Hayes [kcishayes@yahoo.com]
Sent: Thursday, February 17, 2005 5:35 PM
To: Energy, Wind NAE
Subject: Support for Wind Energy Project

Hi,

I am definitely in support of this project. I am very concerned about the burning of fossil fuels, coal, etc. and their effect on the environment. I believe this project is in our best interest.

Thank you for taking the time to consider my email.

Carol Hayes

004062

Do you Yahoo!?
All your favorites on one personal page – Try My Yahoo!
<http://my.yahoo.com>

Adams, Karen K NAE

From: Nick and Sandy [sandynick@comcast.net]
Sent: Thursday, February 17, 2005 5:30 PM
To: Energy, Wind NAE
Subject: I oppose the Cape Wind project

004063

Dear Karen, Two years ago we traveled to Copenhagen, Denmark via cruise ship and going into the harbor we were shocked to see an abandoned windfarm. It was a terrible introduction to this beautiful country and shocked us. Please do not let this happen to Nantucket Sound and vote no for us. I am for alternate energy and Otis Airforce Base is just fine.
Thank you, Sandy Nickerson

Adams, Karen K NAE

From: Wylie Collins [wcoll1@optonline.net]
Sent: Thursday, February 17, 2005 8:20 PM
To: Energy, Wind NAE
Subject: Please Stop Cape Wind Now!

004061

I am a private citizen who has watched with amazement that you, a representative of the US Government, are watching a private developer strive to permanently alter a public precious natural resource for his own personal gain. Jim Gordon and his colleagues are in this for their own profit, period. The benefits to the environment, to the community and to the public that have been put forth are not at all motivating forces of Cape Wind and they pale in comparison to the destruction of Nantucket Sound.

The Army Corps of Engineers has apparently weighed in on the side of big business rather than protect our nation's public's interest.
Sincerely,

Wylie Collins
Nantucket, Mass.

Adams, Karen K NAE

From: Delora Dixon [onebogeywoman@charter.net]
Sent: Thursday, February 17, 2005 8:49 PM
To: Energy, Wind NAE
Subject: Wind Energy!

004065

Dear Army Corps. of Engineers:

I am a resident of coastal North Carolina and have been watching with much interest the way in which the Nantucket Sound Wind Farm has been hampered by political forces rather than factual scientific, economic, or environmental concerns.

Being a resident of coastal North Carolina, and realizing that the presence of wind farms a few miles off our own shoreline would improve our economy while providing pollution-free electricity, I am eager for you to approve the Nantucket Sound project.

Also, please move forward to create a permanent means by which the Army Corps. of Engineers can quickly approve wind farms for coastal North Carolina as well as other states along the seaboard.

It is well known that coal-fired power plants produce mercury and other toxins that have adverse influences on aquatic and marine life. This is of great concern for North Carolinians as much of our economy is driven by the fishing industry. Since wind energy provides pollution free electricity, power produced by wind farms will improve the health of all of our coast's marine life.

Additionally, the large towers that support the turbines provide a natural reef for fish to grow. Having hundreds of new reefs, a few miles off our coastline will create an economic boon for our fishermen.

The opponents of the Nantucket Sound farm have repeatedly claimed that Nantucket Sound is the most beautiful place on earth. I take great offense to this statement. Coastal North Carolina has beautifully clear warm waters and miles of pristine beaches. In my opinion, there is no place on the planet that is more beautiful. Having said that, I would be delighted to add hundreds windmills elegantly spinning on the distant horizon to my view as I walk the beaches watching sailing boats, shrimp trawlers, and Navy ships conducting Marine exercises, while knowing that

2/28/2005

these towers are improving the overall quality of life of my current and future generations of friends and family.

Please do not allow the political posturing and obstructionists methods of powerful Senators such as Ted Kennedy to block the economic progress and environmental welfare of coastal North Carolina.

Sincerely,
Delora Dixon

Adams, Karen K NAE

From: Jenny Heberlein [jlheberl@hacc.edu]
Sent: Friday, February 18, 2005 9:32 AM
To: Energy, Wind NAE
Subject: Bring Cape Wind online!

February 18, 2005

Karen Kirk-Adams
U.S. Army Corps of Engineers, New England District
Cape Wind Energy EIS Project
696 Virginia Road, Concord, MA 01742

004068

Cape Wind Energy EIS Project

I was very excited to hear about the Cape Cod Wind Energy project. The public benefits are indeed compelling. I want to see Massachusetts become a successful example of moving towards a clean energy future.

The project will have minimal impact on fishing, boating and tourism. The wind park will bring high-paying jobs to the area, and I urge the Army Corps of Engineers help to bring Cape Wind into operation quickly and safely.

The visual impacts will be minimal, and with some wind projects, tourists actually travel to see the wind farms.

As an environmentalist, I support the project whole-heartedly. The turbines will have little impact on birds -- according to the American Wind Energy Association, windmills pose a greater threat to avian life than wind turbines. Wind power can replace fossil-fired generation, improving the air quality in the Northeast.

Sincerely,

Jenny Heberlein
1315 Maple Ave
Lancaster, PA 17603-4613
USA
jlheberl@hacc.edu

Adams, Karen K NAE

From: Robert P Gorman [bobfromcapecod@juno.com]
Sent: Friday, February 18, 2005 12:34 PM
To: Energy, Wind NAE
Subject: I oppose the Cape Wind project

304067

Adams, Karen K NAE

From: Jim Eastman [jeastman@rcn.com]
Sent: Friday, February 18, 2005 12:06 AM
To: Energy, Wind NAE
Cc: comments@saveoursound.org
Subject: Re: Cape Wind Energy EIS Project

4068
004068

To: Karen Kirk-Adams
Cape Wind Energy EIS Project
U.S. Army Corps of Engineers, New England District

The USACE is to be commended for its efforts to collect relevant data regarding many environmental factors involved in evaluating the Cape Wind Energy EIS Project. But, unfortunately, some of the conclusions reached in the DEIS appear to be biased, and unsupported by the facts. The analysis ignores significant environmental controls that exist in the areas surrounding the project, but reaches far beyond its boundaries to include benefits that are largely unsubstantiated.

The most significant bias is in the discussion of the benefits of the project. While the DEIS carefully defines the project area in Nantucket Sound, and limits its assessment of environmental impacts to that area, when it addresses benefits (“socioeconomics”) it reaches far beyond the direct impacts of this project. It describes benefits which are unquantified, or speculative at best, for reducing the cost of electricity in New England, reducing the use of foreign oil, improving air quality, and reducing global warming. But the DEIS also recognizes that the project clearly would be a part of the NE power grid. For a realistic perspective on the potential benefits of the project questions such as the following should be answered, relative to the power grid of which it will be a part:

How will the project affect the portion of total demand on the grid that is met by renewable energy sources?

What effect will it have on the demand for foreign oil for the grid?

What effect will it have on air pollution in NE? on the sources of global warming?

If the project is just the first of many that will be necessary to make a significant impact on those environmental factors, how does it lead to further development of renewable energy sources in the grid? What is the long term plan?

Significant, quantifiable benefits would be necessary to justify the environmental impacts the project would have on Nantucket Sound; even just those identified in the DEIS.

But in addition to the environmental impacts described in the DEIS, it ignores a major environmental factor relevant to any large scale industrial development in Nantucket Sound. Although the DEIS may be technically correct by covering only an area defined by an imaginary line in the water, drawn years ago to describe the “three mile state territorial limit”, the practical reality is that the areas surrounding that line are subject to regulation by state and local agencies which have never approved any development even approaching the scale of the Cape Wind proposal. The fact that the shores of Nantucket Sound are not lined with high rise resort hotels and condominiums,

ala Atlantic City and Myrtle Beach, is not due to a lack of development pressure; it is because the citizens of the Cape and the Islands have supported governments and agencies which would prevent over-development.

Over many years those citizens have taken a stand, with their votes and their tax dollars, for preserving the basic character of the Cape and the Islands. They supported the National Seashore; they approved a Commission with regulatory powers over the entire Cape; they assessed themselves for a land bank; and they support many local government and private efforts to preserve land areas, bays, and shorelines. A huge industrial development, in the centerpiece of the area, would be a "sharp stick in the eye" of everyone who has supported those preservation efforts over the years. That imaginary line in the water cannot be a fence around a development that is totally out of scale, and out of character, from the surrounding area.

To remove the apparent bias and present credible conclusions the DEIS should be revised to put the expected benefits of the project in a realistic perspective, and to recognize the environmental standards that have been applied to the surrounding areas. The project area is not an isolated "off-shore" section of the ocean; it is an integral part of a unique combination of land and water that has attracted many people for many years; to visit, to return year after year, and to settle in. An industrial development in Nantucket Sound of the scale proposed by Cape Wind would be a monument to "bureaucratic myopia".

Sincerely,

James Eastman
923 Old Post Rd.
Cotuit MA 02635

Adams, Karen K NAE

From: Mike Taylor [mike@mtay.com]
Sent: Friday, February 18, 2005 2:02 PM
To: Energy, Wind NAE
Subject: I support Cape Wind windmill farm

004069

I am in support of the Cape Wind proposal to build a windmill farm in Nantucket Sound. I feel strongly that we need to take every possible step toward the use of renewable energy. We must be free of fossil fuels and save the environment as well as be politically free of the need for foreign fuels.

Thank you.

Mike Taylor

Adams, Karen K NAE

From: john witheford [j.witheford@comcast.net]
Sent: Friday, February 18, 2005 2:22 PM
To: Energy, Wind NAE

New England District
Cape Wind Energy EIS Project
Attn: Karen Kirk Adams
696 Virginia Road
Concord, MA 01742

004070

Dear Ms. Adams,

About 15 years ago I retired to the Cape after residing in England, Bermuda, Japan, and the metropolitan NYC region. What struck me most about the Cape was how much more the wind blew. So I think that an effort to utilize this wind would be regionally advantageous.

Further, since retiring I have taken up fly-casting, and, as any fly fisherman knows, wind is the bete-noir of precise and enjoyable casting. Locating an array of windmills in Nantucket Sound must result in diminishment of the prevailing Southwesterlies reaching the Cape. This is to the advantage of all resident fly fishermen.

I am therefore in favor of the construction of the windmills for this reason as well as for all the more important ones that others in favor must have mentioned.

Yours truly,
John M. Witheford

Adams, Karen K NAE

From: lzajac@comcast.net
Sent: Friday, February 18, 2005 3:35 PM
To: Energy, Wind NAE
Subject: Comments DEIS

004071

Colonel Thomas Koning
U.S. Army Corps of Engineers,
696 Virginia Rd.,
Concord, MA 01742-2751

Dear Colonel Koning,

The Army Corps of Engineers should deny Cape Wind's application to construct 130 turbines in Nantucket Sound. There is no federal authorization to use our public trust resources for this purpose. Nor does the developer have any property rights to exploit these public lands. **Fundamentally, public lands should not be used for private gain.**

Without federal authorization, any means for protecting coastal resources, or any process for compensating the public, this project cannot be in the public interest. That question must be answered by our representatives after national debate, not by one office of a federal agency improperly arrogating the authority of Congress.

In addition, the draft environmental impact statement that has been prepared is inadequate. More studies are needed before the Army Corps can assess the potential impacts of the Cape Wind project. Indeed, those studies are the very studies that Congress would require to shape a national policy on offshore wind energy. Without this critical information, there is simply no way to determine whether the Cape Wind project is in the best interests of both the public and wildlife.

As it is written, the U.S. Army Corps of Engineers' draft environmental impact statement is seriously flawed, because it ignores relevant information and draws conclusions based on inadequate research.

Based on the above, please deny Cape Wind's application or at the very least, please take the requisite time to do an impact study that properly shows impact on visual pollution, air and boat navigation safety and impacts to wildlife.

Sincerely,
Lauren E. Zajac, Esq.
Resident at LongBeach Road, Centerville, MA

Adams, Karen K NAE

From: wmdstevens2@verizon.net
Sent: Friday, February 18, 2005 4:32 PM
To: Energy, Wind NAE
Subject: Windmills in Nantucket Sound

304072

Army Corps of Engineers:

I wish to comment on the impact statement re: the Cape Wind installation of windmills in Nantucket Sound. My applicable background is as follows:

As a Naval Reserve officer on active duty, I spent two years on a destroyer escort. I was a certified "at sea" officer of the deck. In addition I owned a boat for many years and used it frequently on Cape Cod waters. Therefore, I am familiar with navigation and it's hazards, both at sea on a ship and on Cape waters in a boat.

In my opinion, the reports contention that the Cape Wind project is not a navigational hazard is ridiculous.

First, it will constitute a substantial hazard to recreational fishermen. Second it will make a high yield commercial fishing area unavailable.

In addition to the navigational aspects, it will downgrade the appearance of Nantucket Sound to an extent that it will reduce, significantly, the Cape's tourist revenues.

Yours very truly,
William D. Stevens
64 Hiram Pond Road
Dennis, MA 02638

Adams, Karen K NAE

From: Kirk Lewis [khrusallis@yahoo.com]
Sent: Friday, February 18, 2005 5:09 PM
To: Energy, Wind NAE
Subject: Cape Wind Energy Project

004073

Hello

I am a resident of Massachusetts and would like to express my unconditional support for the Cape Wind Energy Project. Quite simply, we desperately need the energy from this installation and the experience gained as a result will make future installations even more successful. I am part owner of a small fiber optics company in Acton, MA so while not directly involved with this project, do support it as a citizen of this state and country, whose quality of life depends on clean and abundant energy.

Best Regards

David Kirk Lewis
Acton, MA

Adams, Karen K NAE

004074

From: Hartman, Berl [berl@berlhartman.com]
Sent: Friday, February 18, 2005 5:38 PM
To: Energy, Wind NAE
Cc: mepa@state.ma.us; jgordon@capewind.org
Subject: Comments on Cape Wind Project

I submitted these comments earlier, but just want to be sure that they were received.

Thanks,
Berl Hartman

Berl Hartman

*Phone: 617 497-0393
Cell: 617 308-9012
email: berl@berlhartman.com*

*Hartman Consulting
28 Banks Street
Cambridge, MA 02138*

February 7, 2005

Karen Adams
Cape Wind Energy Project EIS Manager
U.S. Corp of Engineers
696 Virginia Road
Concord, MA 02742
e-mail: wind.energy@usace.army.mil

Dear Ms. Adams,

My name is Berl Hartman. I am submitting this letter in support of the Cape Wind project on behalf of myself and my family. I am a Co-Founder of the New England chapter of Environmental Entrepreneurs (www.e2.org), a nationwide volunteer group of business and professional people who believe in protecting the environment while building economic prosperity. In addition to my work with E2, I've had a 30 year career as a businessperson and entrepreneur. Most recently, I was Senior Vice President at Blanc and Otus, a subsidiary of Hill & Knowlton, where I founded and led the company's Cleantech marketing and public relations practice.

I also have four grandchildren and it is mainly because of them that I am writing this letter. Unless our generation acts decisively, global warming will radically change their lives, leaving them with the legacy of rising sea levels, acid rain, unstable weather patterns, stratospheric ozone depletion and an unsustainable existence. It has been estimated that some 9,000 square miles of the United States could be lost in the next 100 years unless current rates of global warming pollution are dramatically reduced.

However, climate change and the need for renewable energy also present an opportunity. Clean energy and Cleantech have the potential to be the 21st century's engine of economic growth, job creation and innovation. Countries like Japan and Germany have made an investment in this new frontier and are beginning to reap the rewards. Whereas Germany had over 14,600 Megawatts of operational wind capacity at the start of 2004, the U.S. had less than 7,000. In Europe, the EU has set a target for 12% of energy to be supplied from renewable sources by 2010; this will include an extra 40,000 MW from large wind farms. The United States will be at a severe competitive disadvantage unless we act soon and decisively.

Cape Wind will provide a huge source of clean, renewable energy at a competitive price, while reducing greenhouse gas pollution and keeping our country competitive. Moreover, it enhances our security by reducing our dependence on imported oil and serves as an example to the rest of America that what's good for the environment is also good for business.

To those that complain about the visual impact of Cape Wind, I am told that the very same argument was raised about construction of the Golden Gate Bridge.

I believe that future generations will look upon Cape Wind as a crowning achievement and the beginning of the 21st century's evolution to a sustainable future.

Sincerely,

Berl Hartman
Principal, Hartman Consulting
28 Banks Street
Cambridge, MA 02138

Adams, Karen K NAE

From: Deborah K. Moss [dkm@avalence.com]
Sent: Friday, February 18, 2005 5:39 PM
To: Energy, Wind NAE
Subject: Applauding your work on Cape Wind

~~CONFIDENTIAL~~
4075

Dear Karen Kirk-Adams

I would like to express my sincere appreciation for the thorough work you have done to substantiate the many benefits to be derived by the Cape Wind project. Please continue your vital work to see this opportunity through to fruition, so that we may all derive the benefits (environmental, public health, and economic) offered by this pivotal renewable energy project.

Thank you for your great work!

Sincerely,

Deborah K. Moss
Avalence, LLC
1240 Oronoque Rd.
Milford, CT 06460
(203) 701-0052
dkm@avalence.com

4076

Adams, Karen K NAE

From: gene [gene.fry@rcn.com]
Sent: Friday, February 18, 2005 6:37 PM
To: Energy, Wind NAE
Subject: Comments on Cape Wind Project

I believe the Cape Wind Project will bring significant overall improvement to the environment.

The Cape Wind Project will reduce emissions of carbon dioxide and sulfur oxides in New England, especially in southeast New England. The effects of these reductions are many. The reduction in sulfur oxides will translate into fewer hospitalizations and human deaths from air pollutions.

New England accounts for about 3% of US electricity generation, and generates about half as much of its electricity from coal or oil as does the U.S. at large (roughly 26% vs 54%). New England also burns lower-sulfur coal and oil than the US at large, probably half the percentage or less. Thus, I estimate that New England accounts for almost 3/4 of 1% of the sulfur emissions from making electricity in the US.

Sulfur, especially as a precursor of fine particulates, is probably the leading cause of deaths from air pollution in the US, by a fairly wide margin over soot, NOx, ozone, and other pollutants. Estimates of US deaths from air pollution have fallen from around 200,000 per year in the 1960s, when sulfur emissions were triple those today, to somewhere in the neighborhood of 20,000 to 50,000. Using the lower end of that range, one can estimate that 3/4 x 1/100 x 20,000 people die from air pollution from New England power plants. This is perhaps 150 people per year, or perhaps 100 people per year from New England sulfur emissions alone.

The Cape Wind Project could offset something like 1% of New England's emissions from electricity generation (300 average MW, compared to about 26,000 MW total - capacity factors of the wind project and of the rest of the system make this all approximate). Thus, the Cape Wind Project, could save about one human life per year, mostly on the Cape as it offsets emissions from Brayton Point, Somerset, and Canal. This has substantial value; I don't know how well the draft EIS has factored this in.

The emissions affect not only humans, but all kinds of wildlife. Any mortality from bird collisions with vanes from the turbines are likely to be more than offset by the benefits of less damage from air pollution. (Since birds fly, a large effort that requires large energy expenditures and a lot of air intake, I suspect they are much more susceptible to air pollution.

Further, the Cape Wind Project will lead to a slightly lower danger of damage from oil spills in Buzzard's Bay and nearby areas, because a bit less oil will be needed when the wind blows, so that the number of oil shipments may drop by several percent. (Independent of emissions, the foundations for the wind turbines, above the seafloor but below sea level, are likely to provide good habitat for a wide variety of fish and other ocean wildlife.)

Reduced emissions of carbon dioxide, as a result of Cape Wind's generation replacing carbon-emitting electric generation in southern New England, will be several drops in the bucket to slow global warming. Among the most certain effects of global warming is that sea levels will rise because sea water expands as it warms. Also very likely, sea levels will rise as glaciers melt, as mountain glaciers are already doing at a great rate. With the Cape Wind project, the sea won't rise quite as much. This will result in a little less storm damage to beaches, homes, and seafront businesses on the Cape, a positive economic benefit. Reducing carbon dioxide emissions will also lessen, if slightly, the expected increase in

the number and severity of storms, somewhat magnifying this economic benefit.

Finally, the Cape Wind Project may well be a net tourist draw. I would certainly go see the wind turbines, both during the construction phase and again, more than once, during the operation phase. I have been to the Cape several times in the last 15 years, but not to the Cape Shore in more than 7 years. Thus, due to the Cape Wind Project, I would visit the Cape much more often. Since I would barely be able to see the turbines from shore, I would probably rent a ride in a boat to tour the wind farm. I believe there are many people like me. I also believe that although some people would be disturbed by seeing wind turbines on the horizon on clear days, as many people would enjoy them, just as many people enjoyed seeing sailing ships on the horizon.

Thank you for considering my comments.

Dr. Gene R. H. Fry, Energy Consultant
6 Aerial Street
Lexington, MA 02421
781-862-6244

Adams, Karen K NAE

4077

From: Andrea Cuccaro [andreacuccaro@yahoo.com]
Sent: Friday, February 18, 2005 7:05 PM
To: Energy, Wind NAE
Subject: clean power on Massachusetts campuses

To the Army Corps of Engineers,

I am writing because it has been brought to my attention by friends of mine that there are many students calling for clean energy on campuses in Massachusetts. I think this is a really great idea! In fact, I think it's absolutely imperative. I read that you are accepting comments right now from the public, and, well, that's me! I would like to see clean energy on every single campus in the country. College campuses are like small towns in of themselves, and it would be great to cut the amount of air pollution in our atmosphere by curbing that of colleges. I urge you to hop on board with this project. Please write back and tell me you are dedicated to cleaning up our air, by implementing renewable energy!

Sincerely,
Andrea Cuccaro
recent college grad

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Adams, Karen K NAE

001078

From: Carter Wilding-White [cwwhite@solar-works.com]
Sent: Friday, February 18, 2005 8:06 PM
To: Energy, Wind NAE
Cc: mepa@state.ma.us
Subject: Cape Wind testimony

To Whom it may concern,
I have been following the cape wind issue for several years now. I have always felt that someone else would speak up to make sure the right thing happened. At this point the issue of Cape Wind may become a reality, and that means I need to make my voice heard.

I appreciate that the Army Corp of Engineers has thoroughly reviewed every aspect of this project and have not only approve it, but support it as well. When I feel that the opposition may have found a way to stop this great project, I was very happy to read the decision from the Army Corp of Engineers. This project will have many effects, and I am glad to see that they are all looked at with an unbiased eye, from many points of view. Thank you for your work.

People know there is a problem, and someone has a solution. It is not the future our grandchildren that ride on this decision, but the future of our own lives.

Carter Wilding-White
Solar Works, Inc.
cwwhite@solar-works.com
cell: 413-441-0682
fax: 509-463-3711

Adams, Karen K NAE

From: Raymond Russ [rayrail@cape.com]
Sent: Friday, February 18, 2005 8:18 PM
To: Energy, Wind NAE
Subject: Cape Wind proposal

034679

Gentlemen:

I wish to state that I am in favor of Cape Winds proposal to install 130 wind turbines in Nantucket Sound for the following reasons:

1. displacement of fossil fuels will have health benefits
2. energy prices will be more stabilized and they will cut down on the import of foreign fossil fuels
3. air and sea navigation will not be adversely affected
4. there will be no audible noise from the turbines that will affect waterfront homes
5. there will be no adverse affects on wildlife, as has been proven in Denmark

Sincerely,

Raymond Russ
P.O. Box 764
So.Chatham, Ma.02659-0764

Adams, Karen K NAE

From: Dorothy R. Brantley [rhodes26@earthlink.net]
Sent: Thursday, February 17, 2005 12:12 AM
To: Energy, Wind NAE
Subject: Wind Energy

004080

Dear Army Corps. of Engineers.

I am a resident of coastal North Carolina and have been watching with much interest the way in which the Nantucket Sound Wind Farm has been hampered by political forces rather than factual scientific, economic, or environmental concerns.

Being a resident of coastal North Carolina, and realizing that the presence of wind farms a few miles off our own shoreline would improve our economy while providing pollution-free electricity, I am eager for you to approve the Nantucket Sound project.

Also, please move forward to create a permanent means by which the Army Corps. of Engineers can quickly approve wind farms for coastal North Carolina as well as other states along the seaboard.

It is well known that coal-fired power plants produce mercury and other toxins that have adverse influences on aquatic and marine life. This is of great concern for North Carolinians as much of our economy is driven by the fishing industry. Since wind energy provides pollution free electricity, power produced by wind farms will improve the health of all of our coast's marine life.

Additionally, the large towers that support the turbines provide a natural reef for fish to grow. Having hundreds of new reefs, a few miles off our coastline will create an economic boon for our fishermen.

The opponents of the Nantucket Sound farm have repeatedly claimed that Nantucket Sound is the most beautiful place on earth. I take great offense to this statement. Coastal North Carolina has beautifully clear warm waters and miles of pristine beaches. In my opinion, there is no place on the planet that is more beautiful. Having said that, I would be delighted to add hundreds windmills elegantly spinning on the distant horizon to my view as I walk the beaches watching sailing boats, shrimp trawlers, and Navy ships conducting Marine exercises, while knowing that

2/28/2005

these towers are improving the overall quality of life of my current and future generations of friends and family.

Please do not allow the political posturing and obstructionists methods of powerful Senators such as Ted Kennedy to block the economic progress and environmental welfare of coastal North Carolina.

Sincerely,
Dorothy Brantley

034081

Adams, Karen K NAE

From: Trevor Faulk [tfaulk26@yahoo.com]
Sent: Thursday, February 17, 2005 8:26 AM
To: Energy, Wind NAE
Subject: Nantucket Sound Wind Farm

Dear Sir/Madam:

I am writing to urge your support for Nantucket Sound Wind Farm. In today's world it is vital to explore renewable energy projects, because they prove to be a solid economical and environmental alternative to the conventional energy sources. Here are some facts taken from the studies overseen by your Agency, as well as some of the State or Federal agencies contributing to the environmental review.

Health Benefits: Displacement of fossil fuel emissions will reduce respiratory diseases, cut premature deaths and save over \$50M in health costs annually. **The Cape needs these benefits, since its air is, on average, 50% dirtier than downtown Boston's.**

Economic Benefits: On average, \$25M in electricity charges will be saved annually, energy prices will tend to stabilize, and the Cape's projected increased need for power can be met without new fossil fuel plants. No harm to property values, tourism or fishing is expected, **but jobs will be created.**

Effects on Wildlife: Few adverse impacts to marine mammals, fish, birds or bats are expected during operation, and very little seabed disturbance is envisioned during construction.

Effects on Energy Supplies: **Reliance on imported fossil fuels, as well as the need for additional fossil fuel plants, will be reduced.**

Effects on Climate Change: The wind farm can serve as a prototype for a nationwide net of renewable energy facilities large enough to buffer us against our own misuse of the planet's resources.

Effects on Navigation: Air and surface navigation would not be adversely affected, and the turbine towers would serve as aids to navigation.

Noise Effects: There would be no noise impacts on recreational boaters, and no long-distance surface or underwater sound effects.

I trust your judgment will be positive towards wind energy exploration in the USA.

Sincerely,

Trevor Faulk

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2/28/2005

Yahoo! Mail - now with 250MB free storage. [Learn more.](#)

Adams, Karen K NAE

From: Chris Allen [antiquelight@comcast.net]
Sent: Wednesday, February 23, 2005 6:55 PM
To: Energy, Wind NAE
Subject: wind park project on Horseshoe Shoal

Dear Ms. Karen Kirk-Adams:

I am writing to support the proposed wind farm in Nantucket Shoals. This idea has numerous economic benefits and very minimal environmental costs, according to the DEIS by the Army Corps of Engineers. It will provide the Cape with a clean and renewable energy source for many years to come. It will advance our knowledge of a key technology that will help reduce our national dependence on oil. And it will benefit other entrepreneurial efforts in the alternative energy field. This is a new idea that deserves our support.

Sincerely,

Chris Allen
45 Elm Street
North Andover, MA 01845

cc:
Capewind

004082

Adams, Karen K NAE

From: Brenna Melvin [bmelvin@beechercarlson.com]
Sent: Wednesday, February 23, 2005 6:55 PM
To: Energy, Wind NAE
Subject: wind park project on Horseshoe Shoal

Dear Ms. Karen Kirk-Adams:

I am writing in support of the Cape Wind project to be built in Nantucket Sound. I have spent every summer of my life on the Cape. I own a home in Chatham and sail between Chatham and Nantucket regularly. I also fish off of Monomoy and dig for clams on Morris Island. I love the feeling of taking a walk along Coastguard Beach in Chatham while breathing in the fresh, clean salt air. Wind farms generate clean renewal energy that will benefit the Cape and the Islands. We need to continue to develop renewable energy sources, in order to allow our children to enjoy the same clean air that we enjoyed. I hope that you feel as I do and fight to allow the Cape Wind project to come to fruition.

Thank you,
Brenna C. Melvin

Sincerely,

Brenna Melvin
5 Musket Lane
Sharon, MA 02067

cc:
Capewind

Adams, Karen K NAE

From: Bob Cote [coteadami@yahoo.com]
Sent: Friday, February 18, 2005 10:32 PM
To: Energy, Wind NAE
Subject: Cape Wind Energy Project

004083

Dear Representative,

I agree that approving the Cape Wind project represents a position that has long-term positive overall environmental impacts. I am a long term supporter of energy efficiency measures, and have recently completed construction of a highly energy efficient home - using almost 100 % renewable energy resources. Unfortunately, there are always those who will object to anything and everything. We are far behind other countries in utilizing wind enegy, and are way ahead in using fossil fuels. I believe the Cape Wind project is an important step in the right direction. If you need me to further document my position, please let me know and I would be glad to do so.

Regards,

Bob Cote
P.O. Box 507
32 Mountain Road
Deerfield, NH 03037

Adams, Karen K NAE

From: Rustin McIntosh [rustinmcintosh@earthlink.net]
Sent: Saturday, February 19, 2005 12:16 AM
To: Energy, Wind NAE
Subject: please support Cape Wind

004084

Dear Sir or Madam:

I want to send this letter in support of the proposed Cape Wind project. I understand this project is controversial, and yet having spoke to those who are against it, and having researched the arguments against it, have come to the conclusion that the benefits from this kind of renewable energy production far outweigh any negative effects that it may have.

Specifically, its hard for me to believe that it would discourage people from visiting the Cape, since the wind turbines that get installed would be far enough off shore so that they would only be visible on a clear day, seen way off on the horizon. People on Nantucket have opposed the Cape Wind initiative, in spite of the fact that they would never even be able to see the machines from Nantucket – they are too far away. Suburban-style growth in some areas of Cape Cod has been rampant in the past 15 years; its seems strange that so much opposition has been generated in this area by a set of wind machines that would be barely visible from only one part of the Cape's coastline.

I have heard many arguments against the Cape Wind project, but a closer look made them appear to be based on unrealistic fears and misinformation. Many of the arguments against the project have been refuted by the environmental impact study. I will not go into all of them in this letter, but I remain convinced that if the project goes through, everything will be fine, and it will be a great step forward in large-scale renewable energy production.

Many European nations have huge installations of wind turbines both on and off shore, without negative impacts to the environment or tourism, and without the public opposition that seems to accompany many proposed wind turbine projects here in the USA. Hopefully we can follow in their example, something the USA badly needs to do, to reduce its dangerous and expensive dependence on imported oil and fossil fuels in general.

Thank you,

Rustin McIntosh
15 Stimson Street, Apt. 16
West Roxbury, MA 02132
617-469-0712

Adams, Karen K NAE

From: Phil Knowles [phildk@prodigy.net]
Sent: Friday, February 18, 2005 11:25 PM
To: Energy, Wind NAE
Cc: mepa@state.ma.us
Subject: Cape Wind - Thoughts

004085

Karen Kirk-Adams
Cape Wind Energy Project EIS Project Manager
U.S. Army Corps of Engineers, New England District
696 Virginia Road
Concord, MA 01742-2751

I'll try to make this brief but helpful.

Intro: Resident of Western Massachusetts, retired, married, parent, grandparent. Lived in Brooklyn, the Navy, New Jersey, California, Connecticut and - for 14+ years. Interested in almost everything, but especially in energy policy and renewable energy programs. Love the outdoors, hiking, skiing, sailing.

We all know the energy supply is finite, increasingly expensive, and often dirty. Except wind, solar, hydro, and some more esoteric things like tidal and geothermal. These are relative non-polluting and relatively 'free' but all come with 'down sides'. Hydro messes up fish life cycles. Solar panels only function in daylight and still cost too much. Windmills are big.

So - - choices. Dig more coal, the most plentiful source of energy, and burn it with as little pollution as you can. Build another nuclear plant and hope 'they' solve the waste problem before long. Run more massive, very high voltage lines to get from where the power is made to where it is used. Buy even more oil from the Middle East. Or get serious about Renewable Sources.

It has been proposed to erect a large wind farm offshore of Cape Cod. Walter Cronkite, Ted Kennedy and the Governor are opposed. I think Mr. Cronkite has changed his mind. I think it is time, and time past, for each of us to reconsider our priorities, our energy choices. Maybe someday we'll have limitless fusion power. Maybe someone will figure a way to make Hydrogen cheaply and use it efficiently to make electricity. But now is now, and the best thing out there is - wind.

GE didn't enter the wind business out of environmental concern - they see potential profits. Danes like their scenery as much as anyone, I assume, but they are well on their way toward getting 25% of their electricity from wind power. Germany just turned on the single largest wind turbine ever built. Every country in Europe is turning to wind for help. Wind power can deliver a small but respectable share of American total power needs if we get out of the way, if we become boosters instead of nay-sayers..

Personally, I'd prefer not to stick a bunch of windmills in the ocean off Cape Cod - or in the Berkshires where we live - or in the Adirondacks where we hike. But I believe it is "time, gentlemen" to fish or cut bait. Shut down our big houses and electronic toys, shut off the street lights - or tell me where you want us to get electricity to supply our growing need. Yes, we absolutely can make serious savings through conservation, (much has been accomplished already), but demand continues to rise. We need other ideas, too.

Cape Wind is an ambitious, wonderful idea. You of the Army Corps have done a wonderful job compiling information in your three year study. Now it is time to get to work and make this project happen. We will be proud when we do, ashamed if we do not.

Philip D. Knowles
11 Pine Knoll Road
Lenox, MA 01240
413-637-3515

2/28/2005

Adams, Karen K NAE

From: Robert A. Fiore [thepooch@optonline.net]
Sent: Saturday, February 19, 2005 5:17 AM
To: Energy, Wind NAE
Subject: Re: My support of "Cape Wind".
Importance: High

034088

Robert A. Fiore
20 Salem Walk
Milford, CT 06460-7132
<□□□袞□□圜8731-874 (203)<□
thepooch@optonline.net

February 19, 2005

Karen Kirk-Adams
Cape Wind Energy EIS Project
U. S. Army Corps of Engineers
New England District
696 Virginia Road
Concord, MA 01742-2751

Ms. Adams,

Please read the attached letter:

Respectfully,

Robert A. Fiore

Robert A. Fiore
20 Salem Walk
Milford, CT 06460-7132
(203) 874-8731
thepooch@optonline.net

February 19, 2005

Cape Wind
75 Arlington Street, Suite 704
Boston, MA 02116-3986

ATTN: Jim Gordon, President

Jim,

I am forwarding a copy of this letter to you that will be sent by me via e-mail to every city, state and federal government official possible, showing my support of "Cape Wind". Through this letter, I am giving you my permission in writing allowing you to forward copies of it to The Army Corp of Engineers or anyone else you wish, because this project must come to fruition. It is obvious that the present system, which is controlled by the major electricity producing monopolies does not work and they do not want to make necessary improvements to bring their companies and equipment into the twenty-first century. Frankly, the improvements should have been made decades ago. All they know how to do is "tell" the public to conserve.

2/28/2005

They have no remorse for their shortcomings. They don't even want to bring some normalcy to their customer's lives, the same customers that make their paychecks a reality. Obviously, you via Cape Wind want to do so. I would say if electricity and the lack there of was new issue, wait a month and then look into it. This is not a new issue; it has been a problem for decades, a paragraph from my own research will prove it.

"The World's Fair's of 1939 and beyond played a crucial role in cushioning the shock of technical change. They showed the corporations and the public the need for electricity and the dependency this country would have on it the future. Unfortunately, the power companies did not grow with the changing times." Well that was over 65 years ago and nothing was done. Since the building of forty-seven more power plants exactly like Hoover Dam, one for each of the contiguous states is impossible. The best, the most "economically sound" way to correct this predicament right now is obvious. Wind power is the best way to produce clean, safe renewable energy. We desperately need projects like Cape Wind.

Projects like Cape Wind will set a precedent for the rest of the America to follow. Plus, it will drastically reduce our dependency on foreign oil, even natural gas and coal. When we reduce our dependency on foreign oil for producing electricity it will lower the price of gas at the pumps as well as the price of home heating oil. Also, it will considerably reduce air pollution too. So it is truly a win, win situation.

Making projects like Cape Wind a scetically pleasing are important but truly miniscule by comparison to improving upon Americas need for clean, safe renewable energy; ascetics can be easily worked out.

Respectfully,

Robert A. Fiore
(Bob)

Robert A. Fiore
20 Salem Walk
Milford, CT 06460-7132
(203) 874-8731
thepooch@optonline.net

February 19, 2005

Cape Wind
75 Arlington Street, Suite 704
Boston, MA 02116-3986

ATTN: Jim Gordon, President

Jim,

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Making projects like Cape Wind ascetically pleasing are important but truly miniscule by comparison to improving upon Americas need for clean, safe renewable energy; ascetics can be easily worked out.

Respectfully,

Robert A. Fiore
(Bob)

Adams, Karen K NAE

From: lisahol@silicondairy.net
Sent: Saturday, February 19, 2005 6:15 AM
To: Energy, Wind NAE

Dear Sirs,

My name is Lisa Holderness. I spend part of every summer in Cotuit and taught marine biology on the Cape for five years in the late eighties and early nineties.

I am appalled although not surprised by the NIMBY attitude expressed by many. There is nothing that would inspire me more than looking out from the town beach at the proposed wind turbines. I am confident that bird life will be successfully deterred from the turbines, and I implore you to set the highest requirements/standards for the transmission line zone. No loss of cape pine/oak woodlands or destruction of valuable scrub. It must go through previously developed land entirely.

If the above conditions are met, I register my support for the project and hope it will prevail. The Cape uses a huge amount of energy and must start to be more sustainable/self-generating.

Thank you,

Lisa M. Holderness
4057 Hinesburg Road
Guilford, VT 05301
(802) 254-3540

004087

Adams, Karen K NAE

From: Brennen Pingree [b_pingree@yahoo.com]
Sent: Saturday, February 19, 2005 8:43 AM
To: Energy, Wind NAE
Subject: cape cod

004080

To whom this may concern, I am writing this to voice my opinion on the cape cod wind project. I am in great support of this and look at it as an opportunity to set the standard for different ways to look at our growing energy crisis.

thanks

Brennen Pingree

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<http://mail.yahoo.com>

Adams, Karen K NAE

From: Bill & Sally Elliott [elliotts@appleisp.net]
Sent: Saturday, February 19, 2005 10:14 AM
To: Energy, Wind NAE
Subject: Wind Farm

Sirs;

I wish to be on record as favoring the Nantucket Sound wind farm. Some of the reasons that the project makes sense include reduction of fossil fuel use with non-polluting wind, reduction of particulate and noxious emissions, and the resulting health and economic benefits. From all I've learned it appears that there would be minimal negative effects on birds, fish, navigation and, if anything, enhancement of tourism and property values. Opponents seem to be struggling to find negatives. To me, the overwhelming evidence is positive.

I'm in favor.

M. W. Elliott

004089

Adams, Karen K NAE

004090

From: Hog4g@aol.com
Sent: Saturday, February 19, 2005 10:00 AM
To: Energy, Wind NAE
Subject: Nantucket Sound Windfarm

Dear Sir(s), Ms(s):

Please allow myself as a citizen to express my wishes for the Windfarm Project to go through. Only recently have we heard in the news about the alarming global temperature increases and the impact this will have in on our community in a few short years! We now have an incredible opportunity to be a power of example to our country and to the world. Please don't let this beautiful opportunity pass us by. Let us start the weaning off fossil fuels!!!

PLEASE!!! FOR OUR CHILDREN'S SAKE!!! PLEASE!!

Sincerely,
Germar Kelly

Adams, Karen K NAE

From: grandeagle@pocketmail.com
Sent: Saturday, February 19, 2005 1:53 PM
To: Energy, Wind NAE
Subject: CZPE WIND

4091

Dear Corps, I think the wind generator project on Nantucket Shoals is a great idea! They will not be a hazard to navigation & will provide a terrific haven for fish. Add that to the obvious benefits in energy cost reduction, this to me is a win-win scenario. It's confusing to me that the gov of Mass (or anyone in the most liberal state of our Union) won't support such a well thought out proposal with such a positive environmental impact. Perhaps it is a case of NIMBY (not in my backyard)? Thanks for your efforts to protect our environment & find new sources for clean, efficient energy. R. Spillane

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Adams, Karen K NAE

From: ynotbgreen@comcast.net
Sent: Saturday, February 19, 2005 2:03 PM
To: Energy, Wind NAE
Cc: Jack Wiggin
Subject: DEIS for Cape Wind Project, commentary

260700

Please forward these comments to the appropriate offices and individuals.

Re: Army Corp of Engineers DEIS, Cape Wind Project

In this letter of comment I refer to the Boston Globe article of August 20, 2004 (*Cape Wind Project Would Hurt View from Historical Sites*) which seemed based on preliminary findings regarding visual implications of the Cape Wind Project.

ANOTHER WAY OF VIEWING WIND MACHINES ON HORSESHOE SHOALS

To the far-seeing eyes of many individuals and organizations the alteration of views by the Cape Wind energy project, as seen from historic sites of the Cape and the Islands, will be welcomed as positive. This point of view is reflective of a much needed paradigm shift from **out of site out of mind**, or **what you don't see won't hurt you**

to one of societal responsibility on a course towards the imperative of **sustainable design**. It is for us all, engineers, media, residents, vacationers, businesses, religious groups, voters, politicians and citizens of every description to discover, to **see** the wisdom of charting this new, difficult, but necessary course as we come to realize and confront our near inexhaustible demands on the earth's limited supply of energy and natural resources. The examples and lessons of this new way of thinking, and of seeing things, be they very visible wind turbines, funny looking hybrid motor vehicles, recycling containers, or the teaching of environmental-consciousness in our schools are part and parcel of our nascent, but evolving respect for the fragile life-support systems of the earth.

These are worthy of boistrous, highly visible celebration, commendation, and demonstration and not of fear and dismissal as suggested in the Boston Globe article **Cape Wind Project Would Hurt View from Historical Sites**. It is far from foresighted to make reverence for the past and its historic features, particularly miles distant, preempt, hold hostage, or trump rational and necessary reverence for the needs of our common, healthy futures and those of the generations to come. The siting of wind machines in view of the Cape and Islands is **exactly the iconic image** needed to open our eyes and remind us of our history of profligate energy use and threatened natural resources.

Our challenge is to face up to the progressively more obvious predicament in which we find ourselves with respect to our energy use and its impact on the environment. We must embrace the fixes necessary and envision and demand a future for Massachusetts and the Cape and Islands in which renewables, such as the wind and solar energy resource, are the very visible leading edge of a trend toward heightened public responsibility and a course toward environmental sustainability.

2/28/2005

Bill Green
Cambridge, MA
February 18, 2005

Adams, Karen K NAE

From: Marian Wineman [mwineman@comcast.net]
Sent: Saturday, February 19, 2005 3:49 PM
To: Energy, Wind NAE
Subject: USDOE Cape Wind Energy DEIS Comments

004083

Rundall Family
Hill Lane

The

10 Windy

East Orleans, MA.
02643-0306

February 18, 2005

Karen Kirk Adams
Cape Wind Energy Project, EIS Project Manager
Army Corps of Engineers, New England District
696 Virginia Rd., Concord, MA 01742-2751

Re: USDOE Cape Wind Energy DEIS

Dear Ms. Adams:

As summer residents of Cape Cod for nearly 50 years and a family that has spent considerable time boating, bird watching, fishing, and doing beach activities in various parts of Nantucket Sound, we support the Cape Wind Energy Project. We have reviewed the DEIS for this project and have over 50 years of combined professional experience in water and air quality assessments, human health and ecological risk assessments, regulatory requirements, hazardous waste site investigation and remediation, and civil engineering. Based on our technical review, we support finalization of the DEIS with no further changes, and as rapid an implementation of the preferred alternative as possible.

In evaluating the proposed project including noise, visual, and wildlife impacts, we find that the noise, air and water pollution impacts from increased ferry, large diesel vessel, and air traffic cause much greater environmental and recreational impacts than the proposed wind turbines. In addition, from the Sound, it is communication towers, electrical transmission towers, water towers, emissions stacks and similar structures on shore that create more visual impairment than the proposed wind farm will, especially considering the typical visibility in the Sound.

We find the combined benefits of this project to health, energy, global warming/air quality and the economy/jobs to far outweigh the limited temporary construction associated impacts that may occur.

In addition, the limited risks posed by this project pale in comparison to the environmental, health, and terrorist risks posed by all other forms of energy currently used including nuclear, coal, oil, natural gas, and waste incineration. These risks do not even count the heavy cost associated with global instability caused by our current

2/28/2005

reliance on fossil fuels.

We have direct experience with state regulations for utility companies for mineral oil. We find that recent concerns raised regarding the storage of mineral oil on the electrical service platform to be unfounded. This is based on our investigation of the toxicological properties and findings of limited human/ecological risks of mineral oil relative to other types of oil. In fact, in some states such as Washington, mineral oil is treated separately in the regulations due to its limited toxicity.

Finally, the proposal is consistent with many successful projects that have been implemented and are operational in many European countries. We also support this project in the interest of remaining technological and environmental leaders in the world.

In conclusion, we support finalization of the DEIS with no further changes, and as rapid an implementation of the preferred alternative as possible.

Sincerely,

John Rundall, B.S. Civil Engineering, 1978, University of Washington

Marian Wineman, M.S.E. Environmental Engineering (minor in environmental law), 1985, University of Washington

M.S. Environmental Toxicology, 1982, University of Wisconsin. Completed more than required course work and research (thesis not completed)

B.S. Botany and Zoology (double major), 1979, University of Wisconsin

Alexi Rundall

Adams, Karen K NAE

From: Lois Brown [loiscbrown@earthlink.net]
Sent: Friday, February 18, 2005 9:05 PM
To: Energy, Wind NAE
Subject: Letter of Support for Wind Farms

Dear Army Corps. of Engineers.

I am a resident of coastal North Carolina and have been watching with much interest the way in which the Nantucket Sound Wind Farm has been hampered by political forces rather than factual scientific, economic, or environmental concerns.

004094

Being a resident of coastal North Carolina, and realizing that the presence of wind farms a few miles off our own shoreline would improve our economy while providing pollution-free electricity, I am eager for you to approve the Nantucket Sound project.

Also, please move forward to create a permanent means by which the Army Corps. of Engineers can quickly approve wind farms for coastal North Carolina as well as other states along the seaboard.

It is well known that coal-fired power plants produce mercury and other toxins that have adverse influences on aquatic and marine life. This is of great concern for North Carolinians as much of our economy is driven by the fishing industry. Since wind energy provides pollution free electricity, power produced by wind farms will improve the health of all of our coast's marine life.

Additionally, the large towers that support the turbines provide a natural reef for fish to grow. Having hundreds of new reefs, a few miles off our coastline will create an economic boon for our fishermen.

The opponents of the Nantucket Sound farm have repeatedly claimed that Nantucket Sound is the most beautiful place on earth. I take great offense to this statement. Coastal North Carolina has beautifully clear warm waters and miles of pristine beaches. In my opinion, there is no place on the planet that is more beautiful. Having said that, I would be delighted to add hundreds of windmills elegantly spinning on the distant horizon to my view as I walk the beaches watching sailing boats, shrimp trawlers, and Navy ships conducting Marine exercises, while knowing that

these towers are improving the overall quality of life of my current and future generations of friends and family.

Please do not allow the political posturing and obstructionists methods of powerful Senators such as Ted Kennedy to block the economic progress and environmental welfare of coastal North Carolina.

Sincerely,

Lois Brown

Jacksonville, NC



**FAULKNER
HOSPITAL**

1153 Centre Street
Boston, Massachusetts 02130
Tel: 617 983-7400, Fax: 617 524-8663
E-mail: dtrull@faulknerhospital.org

David J. Trull
President and CEO

004095

February 18, 2005

Colonel Thomas Koning
US Army Corps of Engineers
696 Virginia Road
Concord, MA 01742

Dear Colonel Koning:

I am writing to express my concern regarding the adequacy of the Cape Wind Draft Environmental Impact Statement. It fails to adequately address areas such as air and boat navigation safety, impacts to birds and other wildlife, pollution threats from oil on the transformer substation, visual pollution and associated economic and tourism impacts, and the analysis of alternative sites.

Please take these and all other objectives into account as this project receives further review.

Thank you,


David J. Trull



TOWN OF EDGARTOWN
OFFICE OF SELECTMEN
70 MAIN STREET, P. O. BOX 5158
EDGARTOWN, MASSACHUSETTS 02539-5158

TELEPHONE
(508) 627-6180
FAX
(508) 627-6123

February 14, 2005

Colonel Thomas Koning
U.S. Army Corps of Engineers
New England District
696 Virginia Road
Concord, MA 01742

004093

Dear Colonel Koning:

On behalf of the Town of Edgartown, we are writing to express our formal opposition to the Cape Wind project and to the Draft Environmental Statement (DEIS) released by the U.S. Army Corps of Engineers. Cape Wind's proposed project is not in the public interest, and the Corps' permit process is an insufficient mechanism under which to review such a proposal. Furthermore, the Corps has failed to give adequate voice to local government concerns. For those reasons, the Town of Edgartown objects to further review of this permit application. If the Corps continues to review the application, it should deny the permit.

The Army Corps has a duty to protect the public trust, in this case the open waters of Nantucket Sound. Approval of the Cape Wind power plant is a fundamental abdication of the Corps' trustee role, as the negative impacts of this proposed power project far outweigh its benefits. The public's interest is not served by allowing a private developer to take control of this public resource for private gain, while collecting millions in subsidies from taxpayers.

The Cape Wind project would have a negative impact on Edgartown and on the region as a whole. Local economies would suffer from a loss of tourism – the financial lifeblood for most of Southeastern Massachusetts – and from the job loss as a result of this decline in tourism. Moreover, another economic mainstay of the area, commercial fishing, would be seriously harmed by the project.

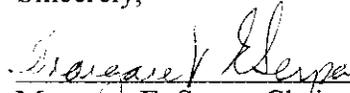
Property values in the region would decline because of visual impacts caused by the Cape Wind power plant. Historic properties would also be negatively affected. Another category of detrimental impacts of the development comes at the expense of the region's wildlife and environment. The Cape Wind development would have adverse effects on birds, some of which are federally protected, marine mammals, fish, and have an overall harmful effect on the Sound's ecosystem. Additionally, the power project is likely to sacrifice any chance of achieving the longstanding goal of designating the Sound as a national marine sanctuary.

February 14, 2005

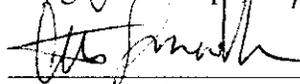
The Town of Edgartown is also opposed to the process used by the Army Corps, as it does not give adequate voice to local concerns and is an improper avenue to approve such a project. An offshore wind energy development should be undertaken only with the cooperation of the communities it affects, adequately addressing the concerns of the affected local governments. Indeed, the Corps should heed the recent Executive Order of the President and facilitate cooperative conservation. See Exec. Order No. 13,352,69 Fed. Reg. 52,989 (August 26, 2004). The Army Corps should comply with President Bush's Order, and consider this as a collaborative activity between federal, state and local entities. The Corps has failed in this respect, and our Town's concerns have been given scant attention throughout this review process.

In conclusion, the Cape Wind project and the DEIS have many flaws. The adverse effects discussed above are not adequately or objectively considered in the DEIS. The project is not in the public interest and would have a damaging impact not only on Edgartown, but on the entire region. As such, we object to the issuance of a permit for this proposal and request that the Corps reject the application.

Sincerely,



Margaret E. Serpa, Chairman



Arthur Smadbeck

Michael J. Donaroma
BOARD OF SELECTMEN

BOS:kma

cc: Congressman William Delahunt
Governor Mitt Romney
Massachusetts Attorney General Thomas Reilly
Senator Rob O'Leary
Representative Demetrius Atsalis
Anne Canaday, Mass. Environmental Policy Act
Phil Dascombe, Cape Cod Commission

RECEIVED

FEB 15 2005

11:00 AM

Eugene M. McQuade
61 Dale Avenue
Hyannisport, MA 02647

004097

February 17, 2005

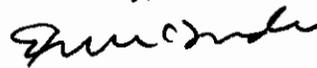
Colonel Thomas Koning
U.S. Army Corps of Engineers
696 Virginia Road
Concord, MA 01742

Dear Colonel Koning:

I am writing with concerns regarding the *Cape Wind Draft Environmental Impact Statement*. As a long time Cape resident, I feel many areas in the study are inadequate and need further investigation to fully appreciate the impact. Those areas include: air and boat navigation safety, impact to birds and other wildlife, pollution threats from oil on the transformer substation, visual pollution and associated economic and tourism impacts and the analysis of alternative sites.

I appreciate your time and consideration into this matter.

Sincerely,



EMM:pac

M

Mr. & Mrs. Donald Mc Couch
67 W Hills Rd
New Canaan, CT 06840

Colonel Thomas Koning
U.S. Army Corps of Engineers
696 Virginia Rd, Concord, MA. 01742

004098

Feb. 19-05

Dear Colonel Koning

As summer residents of Nantucket Island, we strongly feel that the Cape Wind Draft Environmental Impact Statement is inadequate in many areas, including: air and boat navigation safety, impacts to birds, fish & other wildlife, pollution threats from oil on the transformer substation, visual pollution & associated economic & tourism impacts, and the analysis of alternative sites.

If pursued, this project would forever destroy a cherished marine environment which brought us here to Nantucket to live by.

We seriously implore that you withdraw your support for this harmful and unwarranted project.

Sincerely,
Rina & Don McCouch



Dr. and Mrs. Philip Wolf
199 Collins Road
Waban, Massachusetts 02468

004099

2/21/05

Colonel Koning:

The Cape Wind Draft
Environmental Impact Statement
is inadequate in many areas,
including: air and boat navigation
safety, impacts on birds and
other wildlife, pollution threats
from oil on the transformer
substation, visual pollution and
associated economic and tourism
impact, and the analysis of
alternative sites.

Sincerely yours,
Barbara Wolf

146 Little River Road
Cotuit MA 02635
February 19, 2005



Peggie Griffin Bretz
146 Little River Rd.
Cotuit, MA 02635

Colonel Thomas Koning
U. S. Army Corps of Engineers
696 Virginia Road
Concord, MA 01742

004100

Dear Colonel Koning,

I am a resident of Cotuit and
am opposed to Cape Wind locating
a wind farm in Nantucket Sound.

In receiving the Cape Wind
Draft Environmental Impact
Statement, I found it inadequate
in many areas - particularly
as it concerns the impact on birds
and other wildlife, pollution
threats from oil on the substation
and visual pollution as well as
the impact on tourism.

Please do not allow this wind
farm to go forward.
Sincerely, Peggie Griffin Bretz



A note from
SALVATORE RABBIO

SLYDIA BANGSWAY
HARWICH, MA 02645
2-18-05

004101

DEAR COLONEL KONING:

PLEASE ACCEPT THIS
LETTER AS A VOTE AGAINST THE WIND FARM
PROJECT IN NANTUCKET SOUND. I ALSO AM
VERY CONCERNED THAT THE CAPEWIND DRAFT
ENVIRONMENTAL IMPACT STATEMENT IS INADEQUATE
IN MANY AREAS, INCLUDING AIR AND BOAT NAVIGATION
SAFETY, IMPACTS TO BIRDS AND OTHER
WILDLIFE, POLLUTION THREATS FROM OIL ON THE
TRANSFORMER SUBSTATION, VISUAL POLLUTION AND
ASSOCIATED ECONOMIC AND TOURISM IMPACTS,
AND THE ANALYSIS OF ALTERNATIVE SITES.

LET'S KEEP NANTUCKET SOUND
AS PRISTINE AS IT WAS GIVEN TO US, I.E.,
"NATURE'S WAY"

THANK YOU,

Salvatore Rabbio

sites.

-February 10, 2005

Yours truly,

Phyllis M. Cummings
300 Merchant Rd.
East Falmouth Ma.
02536
Tel. 1-508-540-0643

Dear Colonel Koning,

I feel the Cape
Wind Draft Environmental
Impact Statement is
inadequate in many areas,
including: air and boat
navigation safety, impacts
to birds and other wild-
life, pollution threats
from oil on the trans-
former substation, visual
pollution and associated
economic and tourism
impacts, and the
analysis of alternative

004102

114 West Lyon Farm Drive
Greenwich, Connecticut 06831 004103

To Col. Thomas Koning
U.S. Army Corps of
Engineers -

As a ~~Norwalk~~ summer
resident for seventy years,
my family and I are
unabashedly opposed to
the wind farm in our
beautiful sound.

Sincerely -

Sam A. Stephenson

Feb. 17th 2005

MRS. RALPH P. RUDNICK
20 PARK STREET
BROOKLINE, MASSACHUSETTS 02446

2/20/05

004104

Dear Sir,

as a 40 year resident
of Centerville, Ma. on Nantucket
Sound, I implore you not to
be hasty in granting a
permit for the wind farm.

We are all advocates of
alternative energy, but not
please not on Horse shoe
Island. This would be an
atrocity on one of the most
treasured resources I have
ever seen.

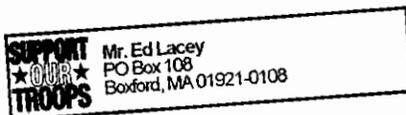
The beaches and beach
and the ocean, and how things
at our own expense, renumbered
our beach. To save it and
protect.

I think there should
be some kind of legislation
if wind farms are going
to be planned for other
sides along the Eastern coast.

Let's not forget there
is a quality of life to be
considered, not alone the
blue fish and the birds!

Thank you for your kind
attention.
JEAN RUDNICK

004105



Dear Colonel Koning,

I am writing to express my concern that further studies need to be conducted regarding the Cape Wind Draft Environmental Impact Statement. Time used to revisit this study would be well spent as if this project is approved I believe it will have a extremely negative impact on Nantucket Sound.

Sincerely
Ed Lacey

Lisa R. Mahoney
Assistant Vice President
Senior Account Officer

Putnam Defined Contribution Plans
Client Service
Investors Way
Norwood, Massachusetts 02062
617-760-6651 fax 617-760-6876
lisa_mahoney@putnaminv.com

004106

Dear Colonel Koring,
as a life long visitor to
Cape Cod (my parents now live there
full time) I am outraged by the
possibility of a wind farm being
built in Nantucket Sound.
Why is a private company being
given free use of a publicly
owned treasure that will
have so many negative side
effects. The structure that
the wind farm be located on
the Horse shoe Shoal is not
because of its proximity to the
Eastern power  grid is ridiculous.

There are many large tracts
of undeveloped land in South Eastern
Mass or all over the Eastern
Seaboard with suitable strategic
locations.

The wind farm will
prove to be a navigational
hazard, adversely affect both
commercial and recreational fishing
and turn an important part
of the eastern flyway into a
slaughter house for birds.

The threat of oil pollution
from the transformer substation
is a possibility, visual
pollution will be a certainty.
Please consider the wishes
of the many over the profit of a few.
Respectfully, Tom Mohr
Norwell, MASS.

004107



Judy Koppen
PO Box 483
West Barnstable, MA 02668-0483

To Colonel Thomas Koning

My family have been
boating, fishing, and swimming in Cape
Cod for over 40 years.

We are all against the ugly
threat of a windfarm in Nantucket
Sound.

We believe the Cape Cod Draft
Environmental Impact Statement is inadequate.

Please don't allow the windfarm
to happen. This threat should be
over with, and not continued any
longer.

Sincerely,
Judy Koppen
ax 63

A note from
Frank Naughton



Mr. & Mrs. Frank Naughton
PO Box 198
West Harwich MA 02671

004103

2-16-03

Dear Col. Koning,

My wife and I are deeply
concerned about the
proposed wind farm for
Nantucket. The potential
for terrorism, the impact
of oil spills, the safety
of boating etc have not
been fully explored.

Also it seems to ~~be~~ that
there are many other sites
that would offer good
opportunity for such
farms

Sincerely

Frank & Elizabeth
Naughton





2550 M Street, NW
Washington, DC 20037-1350
202 457 6000

Facsimile 202-457 6315
www.pattonboggs.com

004109

February 23, 2005

Read K. McCaffrey
(202) 457-5243
rmccaffrey@pattonboggs.com

Karen Kirk-Adams
Cape Wind Energy EIS Project
U.S. Army Corps of Engineers, New England District
696 Virginia Road
Concord, MA 01742

Secretary Ellen Roy Herzfelder
Executive Office of Environmental Affairs
Attn: MEPA Office, Anne Canaday, EOE No. 12643100
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: DEIS for Proposed Cape Wind Project – Nantucket Sound

Dear Ms. Kirk-Adams and Secretary Herzfelder:

I write to you as a resident of Nantucket, Massachusetts and as someone who cares deeply about the preservation of Nantucket Sound. I am opposed to the development and construction of the Cape Wind project over 24 sq. miles of the Sound.

The State of Massachusetts has redefined the area, as you know, and the current application by Cape Wind is erroneous and otherwise moot.

The developers of the Cape Wind project do not own and have no ownership interest, at present or in the future, in the proposed site. The application, which states to the contrary, is a falsehood, in my opinion.

The ability of the Corps to grant a navigational permit for this kind of proposed major commercial construction is well beyond the contemplated scope of your responsibility. You have admitted you have no experience or expertise in this area.

February 23, 2005

Page 2

You are ignoring the strong opposition of the Governor of Massachusetts, the Nantucket Steamship Authority, the Nantucket Airport Authority, the majority of the Massachusetts Congressional delegation.

You seem to be going out of your way to wreak criticism and ridicule for consideration of a proposal over which you have no jurisdiction (no minerals or gas or oil are being extracted here), with which you have no experience and against which every thinking authority has set their stance.

Very truly yours,



Read K. McCaffrey

**Priscilla D. Bellingrath
215 Seaview Avenue
Osterville, MA 02655-2220**

004110

February 23, 2005

Karen Adams
Cape Wind Energy E&S Project
U.S. Army Corps of Engineers
696 Virginia Road
Concord, MA 01742

RE: Comments Regarding Proposed Wind Farm in Nantucket Sound

Dear Ms. Adams:

This letter is to inform you and the Corps of Engineers and the developer who is proposing this outrageous project in Nantucket Sound that I am totally and unequivocally opposed to the construction of the proposed wind plant in any part of the sound.

Nantucket Sound is a national treasure, attracting many visitors and tourists to the Cape and Islands each year, and the thought of constructing a huge industrial complex in what is the major drawing card for the Cape is without merit, and should be stopped immediately.

There are many other reasons I oppose the wind plant, but suffice it to say that this letter will record my official opposition. Should you wish additional reasons, I can be reached at the above address.

Sincerely,



Priscilla D. Bellingrath

11/13/05
11/13/05
11/13/05

Susan O'Brien McLean

Fine Artist

Portraits
Landscapes
Still Life

36 Donna Avenue
Osterville, MA 02655
508-428-1532

004111

36 Donna Avenue
Osterville, Ma. 02655

02/23/05

Ms. Karen Adams
Cape Wind E & S Project
U.S. Army Corps of Engineers
696 Virginia Road
Concord, Ma. 01742

Dear Ms. Adams:

I am writing to you to protest the Cape Wind Project for Nantucket Sound.

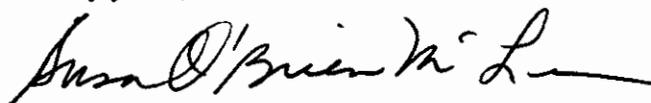
I am an artist and paint on location during the warmer months of the year. A lot of my paintings are of Dowses Beach in Osterville and Craigville Beach in Centerville. The Wind Towers would be very visible from these beaches, which are public beaches for Barnstable residents. I am not a wealthy person, but a concerned ordinary citizen who is very opposed to these monstrous towers standing in the pristine waters of Nantucket Sound. I am only interested in preserving the Cape and its natural beauty.

This project is huge, unproven, environmentally a threat to sea animals and the fishing industry. It is a danger to airplanes, shipping and boating.

It seems so odd to see the Army Corps of Engineers, which is a honorable organization, in the pocket of a greedy private developer like Jim Gordon.

Thank you for your attention. I sincerely hope and pray that this Wind Project will not go any further..

Sincerely yours,



Susan O'Brien McLean

508-428-1532

RECEIVED

FEB 24 2005

RECEIVED



ABOUT THE ARTIST

When she lived in England, Susan O'Brien McLean, painted cricket matches, English country gardens and picnics by quiet streams. Now that she lives in Osterville on Cape Cod, her subjects are children playing by the sea, Cape Cod gardens and landscapes depicting the beauty of Cape Cod. She also likes to paint still-life subjects and portraits.

"But no matter what side of the Atlantic she's worked on, her vision is touched by nostalgia for a gracious lifestyle that is rare in the late 20th century." Mrs. McLean has exhibited in London regularly at the Royal Institute of Painters in Watercolours, the Pastel Society, the Royal Portrait Society and at several galleries in the London area.

In 1994 she was elected a Copley Artist after being accepted in five juried shows at the Copley Society in Boston. Her work has also been included in exhibitions at the Duxbury Art Association, the Cape Museum of Fine Arts, Cape Cod Art Association and the Cahoon Museum where she has received many awards including the Grumbacher Gold Medal in 1997 for excellence in painting. Mrs. McLean was included in the Who's Who in American Women in the year 2000. She is represented by several galleries in New England and Washington, D.C..

February 23, 2005

004112

Karen Adams
Cape Wind Energy E&S Project
U.S. Army Corps of Engineers
696 Virginia Road
Concord, MA 01742

Ms. Adams:

I support the concept of alternative/renewable energy sources in general and wind power specifically.

As an architect I have included solar voltaic panels on projects in addition to other energy saving features in my projects including recycled materials and waste management. I have followed the guidelines of the Massachusetts Energy Code to insure compliance and to provide better buildings for my clients.

In spite of my enthusiasm for alternative energy, I oppose the Cape Wind proposal to locate its electric generating complex in any part of Nantucket sound, especially in Horseshoe Shoals for the following reasons:

- **It is a good idea on the wrong site.**
- Although Horseshoe Shoals is shallow and therefore attractive to a developer planning an offshore wind farm, the cost of producing electricity from this site, in spite of its advantages, is still twice as much as conventional generation facilities according to the Royal Academy of Engineers in the U.K whose study included actual operating costs and electricity production. Why should the public be forced to pay for this extravagance?
- The visual impact of this enormous plant has not been properly depicted to the public in terms of its scale. From Osterville, the proposed installation would cover almost 180 degrees of the view from east through south to west.
- The attempts to depict a night view of this gigantic monstrosity leave a lot to be desired... This should be a major consideration given the 520 flashing red, orange, and white strobe lights proposed. We will have a mammoth, unsightly Christmas tree in the front yard all year long, the kind with twinkling colored lights, and a noisy hum to go with the flashing lights. The pristine quality of Nantucket Sound should not be used as a light show.

- As an architect, I understand the scale of structures, and I am certain all of the computer generated simulations of the appearance of this blemish on our seascape have been erroneous. Numerous first hand reports of European wind farm sites confirm this fact.
- European wind farms are intelligently located in areas mapped by the government, and almost always are in areas adjacent to industrial land sites, not residential or recreational areas as the case is with the Nantucket Sound proposal.
- Another way to understand the scale of the wind farm is to realize that from the beach in Osterville the Great Point Lighthouse on Nantucket which rises only 71' above sea level at a distance of 20 miles is easily visible to the naked eye. Imagine the view of 130 towers with a turbine the size of two Greyhound buses mounted 263' above sea level and a rotating propeller reaching up more than 400' above the sea and only 5 miles away. Do we have honesty here with the public about the visual pollution? The Corps of Engineers has the responsibility to properly document and present the correct information.
- Another example of how to understand the scale of these monstrosities is to realize that the turbines are roughly the size of the small ferries that serve the sound between the Cape and Islands, a staggering realization to understand the size of these turbines. Fortunately the ferries and all other uses of the Sound are temporal while the turbines would be permanent fixtures on the seascape.
- The audio pollution, which will occur 24/7/365 at a sound level approximately equal to that of an approaching Cape Air twin engine airplane has been documented by Dr. Erich Bender and is a matter of record. Night and day, every day, a pervading hum in your ear, in the atmosphere—there's no escape. Assuming the sound of the service helicopter can be heard over the hum of the turbines—a questionable assumption—the helicopter noise just adds to the problem.
- And the platform to support helicopter service? It's the largest off shore structure on the Massachusetts coast.
- With regard to cost: **This project is about money, money in Mr. Gordon's pocket, pure and simple, there is no other motivation.** He has admitted that he could not undertake the project without the subsidies and grants available to him, and so he proposes to accept those considerable gratuities at taxpayers' expense without a dime of restitution for the use of our property . . . what you might call a "land" grab, or in this case, a "sea" grab.

- This project simply will not work without the state and federal **subsidies**. Check your electric bill: see where it says “Renewable Energy?” That’s the fund we contribute to on a monthly basis so Mr. Gordon can reap the rewards of our Massachusetts Renewable Energy Fund for alternative energy projects. He will receive from this fund up to \$40,000,000 annually over the next 10 years. While the renewable energy fund is a good idea, it seems justified only if the developer is paying for the land upon which the development is constructed.
- On the federal side of the coin, he stands to receive “**Tax Credits**” amounting to \$28,000,000 annually for 10 years. Think about it, where does this money come from? It comes from taxpayers, you and me, for the use of public property without due recompense.
- Add the two subsidies together over 10 years—a total of \$680, 000,000—and you can easily see that he is proposing to build this industrial plant at taxpayer and rate payer expense. It’s easy to make money when most of your expenses are covered by others.
- And then there’s the question of what happens if the project is abandoned in the future—mechanical failure, inability to survive the harsh ocean environment, suspension of subsidies, whatever—who deals with the eyesore at that point? Will there be insurance or a bond to insure that every last remnant of this disaster will be removed including the portions below sea level? Who will estimate the cost of removal up front? Certainly not Mr. Gordon. Hopefully someone or some organization whose interests rest with the environmental welfare of the Cape in general and Nantucket Sound in particular will be commissioned to prepare this estimate. The Corps of Engineers should recuse itself from this important analysis. And then there’s the question of who will bond it? Are there firms waiting in the wings? If so, their names should be made public.
- Has the developer included in his project pro forma cost analysis the cost of removal of the wind farm at the end of its useful life? If so, it should be presented to the public. If not, it should be included in the pro forma to determine the real cost of the project and then reported to the public.
- Mr. Gordon talks environment, clean energy, increased employment, improved tourism, reduction on the dependence of foreign oil, reduction of global warming, etc. These are simply smoke screens, because **his real motivation is to make money**, a lot of it, and at our expense. For references on this point, consider his documented previous investments in other electrical generating facilities. Clean energy and environmental concerns were not his reasons for these investments. To the contrary, it was all about making money and “flipping” the investment at the earliest possible time. Might we assume a similar plan with the wind farm?

- Mr. Gordon claims construction of the turbines and blades will provide significant employment. The manufacture of these components, which will likely occur in Rhode Island and employ only a few people, will hardly be significant in New England, and the Cape will see none or very little of this miniscule employment. Similarly, the operation of the wind plant, if constructed, would employ minimal staff. The point here is that his claim of contributing to the economic welfare of the region is simply incorrect and misleading. His towers will, in fact, negatively affect the economic welfare of the Cape and Islands by potentially reducing tourism and diminishing real estate values. If tourism is reduced, and if real estate values are diminished, there would be a serious detrimental effect on all Cape and Islands towns which rely on real estate taxes for their primary source of income.
- Tourism is the basic industry of Cape Cod. The notion that people will come to see the turbines is demented. Perhaps they'll come once to see the destruction or to confirm that they thought it was a bad idea in the first place. Tourists come to Cape Cod for our beautiful beaches, our uncluttered expanse of Nantucket Sound, and for the ambience which is Cape Cod. Someone's stroking themselves if they believe this industrial plant is a tourist attraction. For curiosity seekers, an automobile accident or a house ablaze will also work . . . they'll look at anything—but curiosity seekers are not tourists.
- If the wind farm were to be constructed, "it cannot produce 1.5 million MWhs per year as claimed by the developer. The Energy Venture Analysis (EVA) concludes that Cape Wind would produce perhaps 1.0 to 1.2 million MWhs per year. The EVA Report draws this conclusion based on a survey of other wind farms including offshore projects in Europe, and also uses the best available wind speed data for the Nantucket region. If this is the case, it would seem that Cape Wind's assumed electricity production figures in the DEIS are inaccurate, and thus all the so-called economic and environmental benefits are grossly overstated." (Information from G. Wattley, February 2005)
- Based on this energy production Cape Wind would save 1.76 million barrels of oil per year. While this is a good thing, it doesn't get to the heart of the issue. The US imports roughly 4.4 billion barrels of oil per year, so this would represent a 0.0004% saving. We're better off insisting that Congress develop the fortitude to penalize gas guzzling SUVs, trucks, and cars which consume approximately 3.0 billion barrels of oil per year, or 68% of the total of imported oil. By comparison, oil fired generation of electricity in the US uses only 2% of imported oil. Clearly Mr. Gordon's claims of reducing the dependence on foreign oil imports, while accurate in a microscopic way, are so ridiculously infinitesimal as to be irrelevant. "And more important, the developer's claim of being able to provide 75% of the Cape's energy needs are grossly overstated." (G. Wattley, February 2005)

- “. . . it is possible that the ‘backup power’ for the Cape Wind plant would come from the Canal Plant unit #1, which is oil fired. If this happens, it means that for every MWh of wind-power produced, one MWh of oil-fired electricity would be produced to compensate for the risk of interruption of wind power generation. When that happens, there is no ‘savings of oil’ and no pollution savings.” (G. Wattlely, January 2005) Cape Wind’s claims of oil savings are categorically wrong.
- The actual generating capacity of installed wind power facilities is 25% based on operating experience. Cape Wind has based their calculations on a 40% generating capacity which is totally unrealistic. Even if actual capacity turns out to be 30%, the cost per MWh will increase to over \$100. Meanwhile the market for electricity is \$39 per MWh. (G. Wattlely referencing the Washington State Wind Energy Report, February 2003)
- What is the reliability of construction costs provided by Cape Wind? Their original estimate of \$750 million was based on construction beginning in what year? Whatever assumptions were made, and whatever time table was proposed are likely irrelevant today. As an architect with construction projects under way on the Cape, I can assure you that materials costs have increased by at least two orders of magnitude. Steel prices have virtually doubled, and essentially Cape Wind’s entire construction is steel based. In my opinion, their previously stated costs require complete re-evaluation and this information should be made public.
- What is the reliability of information provided by the developer’s consultants? Why hasn’t the Corps sought their own, independent sources for all the information provided by the developer? It is a travesty of independent assessment to have the developer provide the crucial information on which a judgment is to be made in the public interest? This is especially true when many “findings” made in the DEIS are determined to be inaccurate or incorrect. Examples of inaccuracies in the DEIS include: the audio/noise issue documented by Dr. Bender; the avian studies presented by Ian Nisbet; electrical production estimates as reported in the Energy Venture Analysis Report, and others clearly make this point.
- European (Danish) models of wind plants are frequently cited by the developers and other advocates of the proposed Nantucket Sound wind plant, but there are several critical differences:
 - They’ve mapped their outer continental shelf to determine best locations. The US has not done this, but should before any commercial/industrial development is allowed to proceed.
 - Their turbines are smaller and their towers are shorter making comparisons difficult. Recent reports from Horns Rev confirm that all of the turbines have been decommissioned and returned to shore for major maintenance and repair. Who’s providing the backup power in this case? Certainly not another wind farm.

-European installations are located primarily off shore of industrial or commercial uses, almost never off shore of residential development.

-Many organizations, including governments and congressional members, have called for mapping to determine highest/best use of our OCS waters. Now is the time to undertake this important step.

- By what authority is the Corps of Engineers, whose purview is the permitting of activities relating to harbors and rivers, qualified or empowered to determine highest and best use of the Outer Continental Shelf? Nantucket Sound is hardly a harbor or a river, and the Corps of Engineers is the wrong federal agency to undertake such a complex and potentially devastating development where the very heart and soul of the Cape and Islands resides and is at stake.
- The reputation of the Corps of Engineers precedes the organization. The record is not good when reviewing applications of developers who propose altering the natural landscape. This proposed wind plant project is a very sensitive case from environmental, cost, emotional, technical, and public interest perspectives. In my opinion, the ACOE should demonstrate better command of the importance of these issues than has been presented to date.

Sincerely,

A handwritten signature in black ink that reads "Charles T. Bellingrath". The signature is written in a cursive, flowing style.

Charles T. Bellingrath

C: Secretary Ellen Herzferder,

Executive Office of Environmental Affairs

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508-362-8100
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004113

February 22, 2005

Army Corps of Engineers
Ms. Karen K. Adams
696 Virginia Road
Concord, MA 01742

Re: Cape Wind DEIS

Dear Ms. Adams,

I enclose herewith my comments on the Cape Wind DEIS with specific attention to the subject of the navigational risk assessment.

I would be very pleased to make myself available to you and your staff if I can be of assistance in evaluating the issues that I raise here.

I thank you in advance for your consideration.

Very truly yours,


Charles S. McLaughlin, Jr.

CC:

Hon. Edward M. Kennedy
Hon. John Kerry
Hon. William Delahunt
Hon. Mitt Romney
Hon. Thomas F. Reilly
Hon. Robert O'Leary
Captain Edward LeBlanc, USCG
Mr. Kevin Blount, First Coast Guard District
Secretary Ellen Roy Hertzfelder, MEPA
Ms. Jane Mead, Massachusetts CZM
Mr. Phil Dascombe, Cape Cod Commission

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FEB 23 2005

U.S. ARMY CORPS OF ENGINEERS

A Review of the DEIS Navigational Risk Assessment

**Charles S. McLaughlin, Jr.
Yarmouth Port, Massachusetts
508-362-8100**

Summary:

I am an attorney and a former U.S. Naval Officer. My Navy career in the late 60's and early 70's included duty as Operations Officer at the Boston Naval Shipyard where I directed all tug boat and barge operations, refueling of ships, and all Navy ship movements into and out of Boston Harbor. I also served as Damage Control Officer aboard USS John F. Kennedy where I became intimately familiar with ship construction and damage control and remediation. As well, I have had the privilege of spending more than fifty years on the waters of Nantucket Sound with literally hundreds of transits in, over, and around the Horseshoe Shoals area on power and sailboats.

With this background, I am pleased to offer the following comments on the DEIS Navigational Safety Assessment for your consideration.

The greatest exposure of and risk to the environment and to personal safety stems from the extensive commercial and recreational use of Nantucket Sound by vessels that are fully at risk of collision with the WTG's proposed. The DEIS terribly underestimates and/or utterly ignores these risks in violation of its clear statutory mandate. As well, the DEIS expressly abandons any responsibility to anticipate unintended accidents. Consequently, in violation of basic elements of sound engineering practice, the DEIS fails to require design elements that would mitigate or eliminate clearly foreseeable results of vessel-tower collisions.

The analysis offered by the DEIS is fatally deficient because:

1. It incorrectly assumes that most vessels have a draft that will cause them to run aground before they strike a WTG.
2. It expressly places the sole burden on vessel captains to avoid tower collisions.
3. It ignores that accidents happen, especially in the harsh conditions of the Nantucket Sound environment.
4. The DEIS makes no attempt whatsoever to assess the effect of collisions on vessels, the potential for pollution, and for resulting personal injury.

5. Finally, the DEIS and the ACOE fail to investigate and to mandate construction methodologies in use on the rivers of the United States that would protect vessels and towers should foreseeable accidents occur.

I. The Statutory Duty of the ACOE:

The Army Corps of Engineers has a long history of engineering excellence based on its careful execution of its statutory charges. Here, 33 CFR Part 320.4 imposes upon the Corps the duty to investigate, assess, and weigh the benefits from the proposed construction in Nantucket Sound and to balance those benefits against the “reasonably foreseeable detriments” of the proposed project.

In the range of options available to the Corps, the District Engineer may either approve the project, approve it with modifications and conditions, or deny it if the public interest so indicates.

Because the Corps has placed such heavy reliance on a demonstrably flawed Navigational Risk Assessment (NRA) document submitted by the proponent, and adopted wholesale broad and unsupportable conclusions offered by the NRA, the DEIS is now infected with the same unsupportable conclusions.

As such, the DEIS is in clear violation of its statutory mandate. The result is a project that will have enormous deficiencies of investigation, testing, and mitigation in violation of fundamental engineering principals.

Ultimately, the public interest is ill served because the DEIS fails to protect it from bad, truly shoddy engineering.

II. A Brief Summary of Factual Truths, Fallacies, and Lapses:

A. Vessel Drafts and Charted Water Depths on Horseshoe Shoals:

Over the projected 20-year life of this project, some 225,000 ferry trips (about 11,250 trips per year) carrying literally millions of passengers to and from the islands of Nantucket and Martha’s Vineyard will pass within one mile or less of the nearest generating towers.

The only estimate of vessel traffic offered by Cape Wind in its NRA (and adopted verbatim in the DEIS) is a count of 1305 vessel trips per year measured at Cross Rip, some considerable distance from Horseshoe Shoals. According to the NRA, these ferries have drafts ranging from 7 to 12 feet.

Between six and twelve million gallons of petroleum products are transported to Nantucket annually down the “Main Channel” in barges of 300,000, 500,000 and 1,200,000-gallon capacity, according to representatives of Nantucket’s Harbor Fuel

Company. These barges draw a maximum of eleven (11) feet of water, according to Cape Wind's NRA.

The several hundred fishing vessels that transit primarily the main channel when passing through Nantucket Sound have drafts of between 4 and 11 feet.

According to Cape Wind, only 21.9% of the Horseshoe Shoals water sheet has depths less than 15 feet (Cape Wind NRA, Table 3.1). Only 6.4% has water depth of less than 10 feet. And keep in mind that these charted water depths are measured at mean low water, to which approximately 2.5 to 3 feet of water should be added at high tide.

An examination of the Nantucket Sound chart shows that at least 85-90% of the Horseshoe Shoals water sheet will float all ferries, all fuel barges, and all fishing vessels cited by Cape Winds in its NRA tables.

Furthermore, Cape Wind's NRA shows that only 4 towers (3%) of the 130 towers proposed will be located in water less than 10 feet in depth at mean low water. Another 16 or 12% will be sited in water between 10 and 15 feet in depth (Cape Wind NRA, Table 4.1).

This means than between 110 and 126 of the 130 proposed towers will be in water deep enough, even at low tide, to be struck by virtually all commercial traffic that frequents Nantucket Sound.

B. Exposure to Collision Risk

In discussing the risk of collision, the DEIS concludes:

“The location of the Wind Park relative to established vessel routes, physical water depth restrictions on Horseshoe Shoal (emphasis supplied), and the large WTG grid spacing combine to limit the potential for a vessel to collide with a WTG.”

In light of the facts set out above, the DEIS conclusion is utterly unsupportable. The conclusion, stated more succinctly, is that the water is shallow. Shallow compared to what?

By definition, it is wrong to conclude that Horseshoe Shoals is “shallow” when 85 – 90% of its surface area has sufficient depth to allow virtually all commercial traffic, including all ferry traffic, all fuel barge traffic, and all fishing vessels to strike between 88% and 97% of the WTG's at mean low water.

To base a finding of acceptable risk on such statistics defies all logic.

C. Proximity of WTG's to Heavily Traveled Waterways

The DEIS states in part:

“The risk of a vessel colliding with a WTG is low, given the Wind Park’s location away from typical vessel routes, the small diameter of the towers ... and the large spacing between WTG’s.” (DEIS, page 5-229.)

The sheer magnitude of this factual inaccuracy is hard to comprehend. How far is “away” before it no longer presents an imminent danger or risk?

The imaginary northern edge of Nantucket Sound’s Main Channel is at most a mere three-tenths of a mile from the nearest of the WTG’s. An oil barge with 1,200,000 gallons of petroleum traveling at only six knots, with two knots of current astern, would cover three-tenths of a mile in less than three minutes.

The preferred route for high-speed ferries returning from Nantucket to Hyannis is not more than one mile from the easterly-most WTG’s. Traveling at a speed in excess of 25 knots, a high-speed ferry will cover that distance in less than two and one-half minutes. Traditional ferries traveling at only 14 knots will cover that distance in less than four and one-half minutes.

In the real world of maritime emergencies at sea, these margins of error are tiny. Given the forces involved, these margins are inadequate.

D. Aids to Navigation and Communication Interference:

As discussed more fully below, the DEIS places a great deal responsibility for safe vessel operation on each vessel’s captain. A critical aid to navigation utilized by virtually all commercial vessels transiting the vicinity is radar.

In the United Kingdom, serious radar operation deficiencies have been identified by the UK’s Maritime and Coastguard Agency in and around the Hoyle Wind Farm installation. In a report dated November 11, 2004, it was observed that

“... The WTG’s produced blink and shadow areas in which other turbines and vessels could not be detected unless the other vessel was moving. Detection of targets within the wind farm was also reduced by the cross- and down-range responses from the WTG’s which limited range and bearing discrimination. ... Sea and rain clutter will present further difficulties to target detection within and close to wind farms...”

The report went on to state,

“There are however concerns about the use of both ship-borne and shore-based radar as an effective aid to navigation to both vessel and mark detection and, consequently, for ship-to-ship collision avoidance in the proximity of wind farms...

“These effects can be mitigated by vessels keeping well clear of wind farms in open water or, where navigation is restricted, keeping wind farm boundaries at suitable distances from established traffic routes ...

“A Department of Trade and Industry-funded navigational risk assessment project is about to be undertaken. This will produce a methodology for assessing navigational risk – and maritime risk in general – in and around offshore wind farms... Included in this will be recommendations on suitable distances of wind farm boundaries from traffic routes.”

Curiously, while the DEIS places great responsibility for vessel safety on the vessel’s captain, the DEIS is silent on the issue of the effectiveness of radar in and around the proposed facility. At variance to the findings in the UK, Cape Wind’s NAR suggests that problems “are not anticipated” (NAR, page 28).

Perhaps both the Army Corps and Cape Wind might want to speak with our friends across the pond.

E. Accidents Happen

Attached to this memorandum are a series of vessel casualty reports taken from recent issues of “Professional Mariner” Magazine. These recount a multitude of recent accidents that have occurred primarily on US waterways. A number of reports deal with accidents in Massachusetts waters, including reports dealing with the Steamship Authority. Consider only some of the headlines:

- **“Tugboat hits bottom after pilot heads below for relief.”**
- **“Fisherman dies after being struck by tug and barge”, where the master may have suffered a heart attack.**
- **“Poor communication causes close call on the Delaware”, criticizing a US Navy vessel for contributing to a near accident.**
- **“Cruise Vessel runs into trouble...” after a steering failure.**
- **“High speed ferry runs aground following engine failure” dealing with the Steamship Authority’s May 9, 2002 incident in Nantucket Harbor in a 30-knot northeast gale.**

- **A series of articles dealing with the deadly consequences of the 2003 Staten Island Ferry docking collision that killed eleven and injured many more.**

And one need only think back to the Buzzard's Bay Bouchard barge incident, cited so often by the project's proponents as a reason to support this application, to recognize how easily accidents at sea happen and how catastrophic such accidents can be. As well, remembering the Staten Island Ferry disaster of last year where 11 passengers were killed in a collision with a dock at apparently something less than 15 knots is a lesson that should not be lost in this analysis.

All of these reports highlight in dramatic fashion that steering mechanisms fail, engines fail, electronics fail, tow lines snap, skippers get sick, and indeed that skippers are occasionally inattentive, sleepy, lost, or negligent.

None of this, of course, is discussed in Cape Wind's NRA. Nor is it even remotely explored in the DEIS. Even though it is highly likely that marine accidents will occur within the confines of the proposed project, and that this eventuality is highly foreseeable, the DEIS remains silent on the subject. But more on this subject below.

II. The DEIS/ACOE Position on Foreseeable Accidents

The accident summaries referred to above and New Englander's own bitter experiences locally highlight the random, unpredictable, and relatively frequent occurrence of "incidents" in local waters. Like accidents on the Southeast expressway, we may not know where, when, or how a given accident will occur but we awake every morning relatively assured that an accident will likely mar our trip to or from Boston.

That marine accidents are foreseeable is beyond debate. But if this project goes forward, there is every reasonable probability that, over its twenty-year life, accidents involving commercial or pleasure vessels will take place.

The ACOE response?

"The ability to safely navigate in and around the WTG's during any set of weather and/or vessel conditions must be determined by and is the responsibility of each vessel's captain." (Page 5-231 of the DEIS.)

In an exceptional pronouncement, the ACOE states,

"Risks and impacts associated with the failure to comply with COLREGS (navigational rules of the road) or unsafe vessel operation cannot be evaluated and are beyond the scope of this report".

The two statements represent a bold, clear, unequivocal, and wholesale abandonment of the Army Corps' statutory legal responsibility. According to the ACOE, it's the skipper's responsibility to prevent accidents. Period.

This approach would not be, and in fact is not, tolerated by the government or the courts in automotive and aeronautical engineering arenas; neither should it be tolerated in the marine environment. The potential for catastrophe is too high.

We design major highways with no telephone poles along the sidelines. We design highway signage with breakaway bases. We design modern guardrails that angle down to ground level at either end of their runs to prevent impalements. Engineers design cars with crumple zones that anticipate collisions; they design gas tanks located forward of the rear axels to prevent explosions in the event of rear-end impacts.

Every one of these design features recognizes that accidents happen. Every one of these design elements, and thousands more like them, implicitly acknowledge that accidents are reasonably foreseeable. Drivers get ill, fall asleep, talk on the cell phone, don't pay attention, have blowouts, and even drive under the influence. Accidents happen and each of these design innovations recognizes this fact of life and is intended to mitigate the consequences of human error.

The entire body of product liability law since the famous exploding Corvair cases and Ralph Nader's famous book, Unsafe at Any Speed, stand for the proposition that even a small risk of significant harm requires a extraordinary efforts to prevent it.

Nowhere in the navigational risk assessment of the DEIS are these sound engineering and legal principals applied, found, or even acknowledged. In fact, the opposite is true. The ACOE's abandonment of responsibility to anticipate and plan for accidents is worth repeating:

“Risks and impacts associated with failure to comply with COLREGS (navigational rules of the road) or unsafe vessel operation cannot be evaluated and are beyond the scope of this report.”

“The ability to safely navigate in and around the WTG's during any set of weather and/or vessel conditions must be determined by and is the responsibility of each vessel's captain.”

Talk about washing one's hand of responsibility! What the Corps is saying is that if a vessel fails for ANY reason to comply with the rules of the road, it's the captain's fault and there is NO obligation on the part of the Army Corps to require a design that anticipates such a failure in a way that minimizes the prospect of personal injury or property damage.

The DEIS is also saying in black and white that the Corps cannot envision what the range of potential damages are that might occur in a foreseeable accident and that it has no obligation to explore this subject further.

Nevertheless, it appears all but certain that the ACOE is ready to approve this project.

This failure is nothing short of shocking!

III. Vessel Damage on Impact

A. The DEIS utterly ignores exploration of the effects of a WTG collision on a vessel, and tracks Cape Wind's conscious ducking of this issue.

“A drifting vessel, if it were to collide with a WTG, would likely receive some level of structural damage, but would remain afloat. A vessel colliding while under power would sustain substantially greater damage.” (DEIS, page 5-229.)

First, there is no apparent source for these DEIS conclusions. Cape Wind's own NRA does not state whether a vessel would remain afloat after WTG impact at drifting speed of 3 knots. The DEIS therefore has no basis whatsoever to arrive at any such conclusions.

And as to the second half of the statement, “A vessel colliding while under power would sustain substantially greater damage”, table 4.5 of Cape Wind's NRA again avoids any conclusions as to the potential extent of hull damage and consequences to the vessels that would follow.

B. Cape Wind's vessel impact assessment methodology itself is fatally flawed, for at least the following reasons:

- No real time tank testing of vessel types, sizes, tonnage, or method of construction (steel frame, fiberglass mold, plank on frame, etc.) nor construction materials (steel, aluminum, fiberglass, wood) were taken into consideration. Computerized parameters were essentially two only in number: speed of impact and dead weight tonnage.
- Hull speed parameters of the study (Table 4.2, NTA) are dangerously and unrealistically low. For example,
 - Maximum barge speed in the study is only three knots.
 - Maximum ferry speed is twelve knots.
 - Maximum yacht speed is twelve knots.

Barges are towed at significantly higher speeds, fast ferries travel in excess of 30 knots, and yachts proceed at higher speeds still. And all travel in

wind and current conditions that can add several knots to the speed of impact.

- No estimates of the extent of damage to vessels were attempted, given the extent of hull penetration that was calculated for each vessel chosen. For example,
 - Referring to table 4.4 of the NRA, what would happen to a ferry's superstructure, passenger compartments, and hull plating below the waterline in the event of a "1.5 foot penetration"?
 - What would happen to a barge carrying 1.2 million gallons of petroleum, be it single or double hulled?
 - Does anyone seriously think that a yacht could survive a hull penetration of 2.1 feet (Table 4.5, NRA)?

The most likely source of massive pollution and personal injury is vessel collisions with WTG's. A barge carrying perhaps 4,000,000 pounds of fuel in bulk to Nantucket will split apart like an egg dropped on concrete if it collides with a WTG at a speed of even five (5) knots. WTG's will cut through a ferry colliding at ten (10) knots like a hot knife through butter. Witness the devastation and resulting loss of life in the recent Staten Island Ferry disaster.

Shockingly, the DEIS relies on demonstrably flawed assumptions, inadequate testing, unsupported conclusions that even Cape Wind does not proffer, and ultimately concludes that there is indeed no significant threat to safe navigation.

IV. Additional Testing:

Despite the proximity of one of the finest marine test tank facilities and staff in the world at MIT's Ocean Engineering Department in Cambridge, no tank testing was apparently undertaken to study the effect of collisions on commercial and recreational vessels, and on their cargoes, be it petroleum or vacationers. Reliance appears solely based on computer calculations of impact forces conducted in a vacuum devoid of real life input.

Having failed to adequately examine these parameters, it is legally and factually impossible for the Corps to reach a defensible conclusion that the benefits of this project to outweigh its risks. In actuality, the Corps has absolutely no idea what the extent of the risk is.

Therefore, the ACOE should suspend the process to undertake independent studies to be conducted at MIT's marine test facilities to determine potential damage to barges, ferries, fishing and pleasure boats colliding with the WTG's at various simulated speeds. Potential for personal injury and oil spills should also be estimated as part of this study. Costs can be collected from the applicant.

Only in this way can the ACOE and the public have some minimal confidence that the risks to vessels, passengers, cargo, and ultimately the environment resulting from WTG collisions have been competently evaluated.

V. Damage Assessment and Mitigation: Islands, Fenders, and Tower Locations

For so many legal, practical, and policy reasons, the Cape Wind project should not be approved by the ACOE. Nevertheless, if this obscenity is allowed to proceed, the Corps should at the very least order a number of mitigation efforts that should be built into the WTG construction.

For example, as the accompanying *Professional Mariner* magazine article points out, the ACOE and various states are cooperating in the design of new bridges and the retrofitting of older bridges over rivers with tug and ship traffic to require fenders to protect both the bridges and the vessels in the event of collision.

As well, some structures are being surrounded with artificial islands to ground shipping before impacts could occur. Such measures should be considered here, at least for the outer perimeter of WTG's and the service platform.

Greater separation of traveled waterways from towers should be mandated. Per the UK Coastguard study discussed above, however, it is not possible to say what an appropriate degree of separation is, at least until the UK's tests provide some guidelines on the subject. Until those tests are complete and guidelines formulated, the current review process should be suspended.

Thereafter, once the appropriate degree of separation has been researched and defined, the only alternative is to eliminate the towers or reduce them in number so as to give required separation because Nantucket Sound's heavily traveled waterways are defined and cannot be moved.

Conclusion:

Accidents happen. They are foreseeable.

Laying the entire issue of environmental protection and public safety solely at the feet of vessel operators is naïve in the extreme. Suggesting that the ACOE's obligation is met by reminding skippers of their obligation to observe the nautical rules of the road is wrong.

And having potentially allowed 130 massive obstructions to be placed on this heavily traveled stretch of water, it is legally inadequate for the ACOE to forgo estimating the extent of vessel damage in the event of a WTG collision.

The Corps has an absolute legal and moral obligation to see what damage these structures are capable of causing to vessels, people, and the environment, and to either deny approval of the project or, at the very least, to cause modifications that reflect the identified risks.

This is the very least that the public should expect from the Army Corps.

MARITIME CASUALTIES

"If the Coast Guard hadn't gotten the pumps, if the small boats hadn't got there, it probably would have been in big trouble," Bellaty was quoted as saying. "I think the boat very well may not have made it."

The Coast Guard initially removed five people from *Ernestina*, leaving only enough crew to handle the lines and sails. They were returned as soon as it became clear that the ship was out of danger.

There were no injuries during the incident.

Lt. Kiersten Codel, a casualty investigator attached to the Marine Safety Field Office in Coram, N.Y., confirmed that the caulking was missing from critical seams. She said, "The divers found that the garboard seams on both sides were open and the caulking gone." She said they covered the open seams with rubber sheeting from the stem to two-thirds of the way back. "That stopped the flooding, so there's only minor leakage. But their pumps can keep up with it."

The Coast Guard drew up a safety plan before allowing *Ernestina* to leave Greenport for its home port of New Bedford, Mass. The plan, approved by captain of the port for Long Island Sound, Joseph Kocchia, included pumps, an accompanying tug, a watch activity list, a crew list and a communications plan that required contact with the Coast Guard every three hours during transit.

Codel said the ship left Greenport at 1545 on July 31, without the 15 non-crew passengers *Ernestina* had been carrying to Nantucket. Plans have been made for repairs in a New Bedford dry dock.

D'Amore said the crew of the utility boat stayed on the scene until representatives of the Coast Guard Marine Safety Field Office arrived to inspect the schooner.

Ernestina was built in Essex, Mass., in 1894 as the fishing schooner *Effie M. Morrissey*. It has made 20 trips to the Antarctic and numerous voyages bringing Cape Verde immigrants to the United States. It was presented to Massachusetts in 1982 by the Cape Verde government to thank the United States for helping Cape Verde gain independence from Portugal.

Steven J. Wallach

High-speed ferry runs aground following engine failure

Things tend to go wrong at the worst time. At a critical point of the voyage, while entering the harbor at Nantucket Island, Mass., the high-speed catamaran passenger ferry *Flying Cloud* suddenly lost power from one of its two engines and then ran aground May 9.

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MARITIME CASUALTIES

With winds running about 30 knots from the northeast, the starboard main Paxman 12VP185 diesel engine powering the starboard Kamewa 71S waterjet propulsor of *Flying Cloud* failed. Attempts by the crew to restart the diesel engine were unsuccessful, leaving the 134-foot, 38.5-dwt vessel at a distinct maneuvering disadvantage.

James P. Swindler, director of operations with the Woods Hole, Martha's Vineyard and Nantucket Steamship Authority, owner and operator of *Flying Cloud*, described the sequence of events as the vessel maneuvered on only one propulsor: "Because of the direction of the winds, we were not able to use the slip normally used, so the captain tried to put the vessel on the face between the two slips. During that attempt, the wind caught the stern, since we only had one engine and one waterjet, and as the wind got on the port beam of the vessel, it was pushed into a shallow shoaled area of rocks."

Flying Cloud's situation quickly worsened when one of the T-foil stabilizers was dislodged by the impact with the rocks. "Because of the T-foil coming off, it poked a hole into one of the voids, and there was some flooding. The vessel is built to two-compartment subdivision in the event of flooding, so the vessel was

never in any danger of sinking," Swindler said.

Assistance was requested from the U.S. Coast Guard, which dispatched *CG47289*, a 47-foot search-and-rescue boat. It assisted *Flying Cloud* out of the shoal area and to the face of the slips for mooring. Passengers were disembarked and temporary repairs were made.

Flying Cloud was later towed to the American Shipyard in Newport, R.I., for permanent repairs, including replacement of the T-foil stabilizer. An initial concern that the engine might have to be replaced proved unfounded. The propulsion failure was determined to have been the result of a malfunction of the diesel engine's speed governor, according to Swindler.

The incident occurred on a Thursday morning. The fully repaired *Flying Cloud* was out of American Shipyard and back in regular service on Sunday morning.

Flying Cloud can carry up to 300 passengers at a service speed of 36 knots and operates with a crew of five. Built by Derektor Shipyards in Mamaroneck, N.Y., the vessel entered service in late May 2000.

During the first year of operation, there were several other problems with the Paxman diesels, the most severe being damage to one of the cylinders attributed to a momentary loss of lubrication. Swindler said the

ADVERTISER INDEX

Advertiser (Reader Service Number)	Page	Advertiser (Reader Service Number)	Page	Advertiser (Reader Service Number)	Page
Algae-X (69)	61	Gladding Hearn	13	Professional Mariner Stock Photo.	66
Allied Systems (25)	13	Grand Yachts Inc. (104)	69	Professional Mariner's Ins. (82)	49
Beclawat (26)	44	Great American Insurance (76)	51	Raymarine (83)	c4
Bender Employment (70)	20	Hampton Roads/Tidewater (36)	69	Resolve Fire & Hazard (84)	58
Board of Pilot Commissioners	63	Hornbeck Offshore (77)	70	Sabine Transportation (85)	53
Borel Manufacturing (27)	54	Intercon (37)	25	Sea Enterprises (19)	17
Burrard Iron Works (28)	24	J.H. Breakell (38)	65	Sea School (52)	56
California Maritime (29)	50	Jastram (39)	52	Sea-K's Licensing (86)	46
Canaveral Port Authority (72)	27	Kidde Fire Systems (42)	15	Seamen's Church (53)	53
Caribbean Nautical (30)	61	KVH—InmarTracPhone (12)	2	Seawave (87)	23
Celesticomp	39	Kvichak/Derektor (41)	9	Skookum (54)	42
Cetrulo & Capone (2)	54	Latti Associates (13)	30	Smith Maritime (20)	65
Chapman School of Seamanship (102)	46	Maine Maritime Business School (40)	35	SNAME EXPO (21)	16
Chesapeake Marine Training Institute (3)	60	Maine Maritime Continuing Ed.	51	SOS (55)	56
Clatsop Community College (31)	55	Maptech (44)	7	Standard Communications (56)	c3
ComNav (73)	30	Marine Safety International (45)	10	STAR Center (88)	26
Compass Courses (32)	42	Maritime Historical Lithos (79)	46	Starpath (57)	43
Corliss Nugent & Assoc. (33)	63	Maritime Legal Resources (14)	59	SUNY (58)	50
Cottage Furniture Ltd. (4)	68	Maritime Professional Training (46)	14	Tabak & Mellusi (59)	20
Craft Bearing Co. (5)	31	Maritime Professional Training STCW (99)	58	Titan Maritime (60)	48
Cygnus (6)	12	Mass Maritime (47)	8	Training Resources (61)	27
David Boone Marine Artist (7)	68	MOPS (80)	47	Transas USA (62)	c2
Deansteel (74)	44	Negron/Walport (81)	52	Tugwear (63)	24
Demaree Inflatable Boats (8)	38	New England Maritime (16)	70	USMMA (89)	49
Engineer for California Research Vessel	59	NOAA	18	Van Cappellen (23,22)	17, 69
ENSCO	12	Northeast Maritime (48)	11	Viking Fender (64)	5
Fjord Inc. (Chafe-Pro) (9)	55	OM Ships (49)	60	Washburn & Doughty (65)	20
Floscan (34)	70	Omnihruster (50)	22	Young Weather Instruments (90)	35
Fremont Maritime/India Tango (35)	32	Pilothouse (51)	46	Zidell Marine (66)	70
Furuno (10)	1	Pioneer Research (Steiner) (17)	5		

engine manufacturer "certainly stood behind the engine," providing the necessary support to resolve the engine difficulties.

Flying Cloud is fitted with a Maritime Dynamics ride control system, comprising a T-foil and interceptor on each hull. The T-foil's separation from the hull was not totally unexpected. The vessel's design provides for the mounting bolts holding the T-foil to the hull to shear at a certain stress level, allowing the T-foil to drop away without further damage to the hull, according to Lt. j.g. Joshua Pennington with the U.S. Coast Guard Marine Safety Office in Providence, R.I.

The T-foil is built with a transponder in it, so if it does fall away during an incident, it can be tracked and recovered.

Although the investigation is not yet complete, investigators suspect that after breaking loose, the T-foil bumped the hull several times as the boat moved forward in the shallow water, resulting in the small punctures and minor flooding.

Flying Cloud makes six round trips daily between Hyannis Port on Cape Cod and Nantucket. The high-speed ferry has slashed travel time over the 21-mile route by more than half, making the one-way trip in 55 minutes, compared with a conventional ferry's running time of 2 hours 15 minutes.

Swindler said the high-speed approach has proven itself with "real big numbers ever since the boat came on line. The market is definitely there."

Richard O. Aichele

Megayacht burns at builder's dock in New Orleans

A \$30 million megayacht being built for a New Zealand billionaire caught fire at its outfitting dock and was in danger of sinking for a time.

The 192-foot *Ulysses* was in its final outfitting phase at Trinity Yachts in New Orleans, when a fire began shortly after midnight on July 2. The fire quickly spread to six alarms as over 100 firefighters battled for

over nine hours to extinguish it.

The Port of New Orleans' fireboat *General Roy S. Kelley* helped to fight the fire. At one point, it placed its bow against the port side of the ship to keep it from rolling over. *Ulysses* had begun to list dangerously to port because of the water firefighters had poured on the boat.



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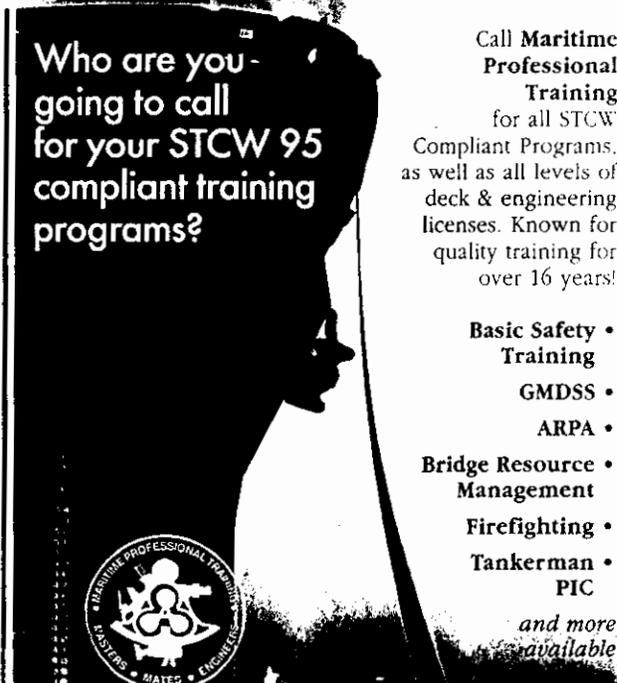
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MARITIME CASUALTIES

the port, the solenoid-actuated directional control valve in the ship's controllable-pitch propeller failed.

"That mechanical failure caused the vessel to go aground in shallow water," Martin said. "The propeller blade got stuck in the full-ahead pitch position."

There was no pollution from the incident.

The cargo was partially unloaded to barges to help refloat the ship. "The ship actually floated once the cargo was taken off again," said Cliff Nelson, port captain for Morehead City Towboat Co., the firm that

towed *Borc* into port after it refloated.

Borc was refloated on the morning of July 11. Although *Borc* was not blocking the channel, the Coast Guard issued a warning to mariners because the vessel's stern was blocking the next navigation aid for ships traveling inbound, according to Martin.

Once the ship was towed to port, a diver inspected the hull and found just cosmetic damage, Martin said. Repairs to the hull were not necessary.

David Tyler

Tug sinks after being struck by its own barge

The 765-hp tug *Seaspan Planet* sank in early July after it was run over by the barge it was towing in the Fraser River near Vancouver, British Columbia.

According to *Seaspan* port captain, Brian Stansbury, the small single-screw tug "flopped" when flood-level river currents pushed the tug's nose 90° to one side in

front of the oncoming barge. One of the tug's two-man crew was on the barge when the sinking occurred, and the tug operator escaped safely.

Salvage operations commenced when river levels receded.

Hugh Ware

Towboat sinks after taking in water through crack in hull

Miss Renee, a 55-foot towboat, capsized and sank in the Houston Ship Channel on July 8. All three crewmen were rescued by the U.S. Coast Guard and were uninjured.

Miss Renee, an uninspected vessel, had been pushing barges in the Intracoastal Waterway. After dropping its tow near Galveston, the towboat was heading north in the Houston Ship Channel when the crew noticed that the vessel had begun to list and that water was coming over the back deck.

According to Lt. Bob Compher of the Marine Safety Unit Galveston, one of the crewmen was sent to investigate the problem in the engine room and discovered that there was a significant amount of water there. Not long after his discovery, the ship began to list to starboard even more. About 20 to 30 minutes after the discovery in the engine room, the boat capsized in the ship channel and sank in 50 feet of water. The vessel came to rest upside down.

The crewmen escaped wearing life jackets and were

rescued by a 41-footer from the Coast Guard Station Galveston.

Subsequent examination of the boat revealed a crack in the aft deck. The cause of the crack has not been determined.

Water came in through the crack and filled the void space below the steering equipment before making its way forward and into the engine room, according to the Coast Guard.

The sinking caused the Houston Ship Channel to be closed for two hours. One-way traffic was restricted for 24 hours so that a salvage team could be brought in to raise the tug.

T&T Marine Salvage Inc. rolled the tug's hull upright using a derrick barge and crane and then raised the hull. *Miss Renee* was removed from the ship channel, dewatered and moved to Port Bolivar Marine Service for inspection and possible repair.

John Snyder

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Casualties



Courtesy U.S. Coast Guard/Andrew Kendrick

Fuel barge pokes a hole in a tanker, spilling 25,000 gallons of oil in a Texas river

An estimated 25,200 gallons of No. 6 oil spilled in the Neches River near Port Arthur, Texas, when fuel barge *Buffalo 405* struck and pierced the hull of the 528-foot Danish oil tanker *Torm Mary* during a fueling operation on Aug. 2, at about 0020.

As a result of the accident, the river was closed to vessels for two days. During the closure seven outbound ships, six inbound ships and 70 barges were delayed.

The barge, owned by Buffalo Marine Service and pushed by the tug *San*

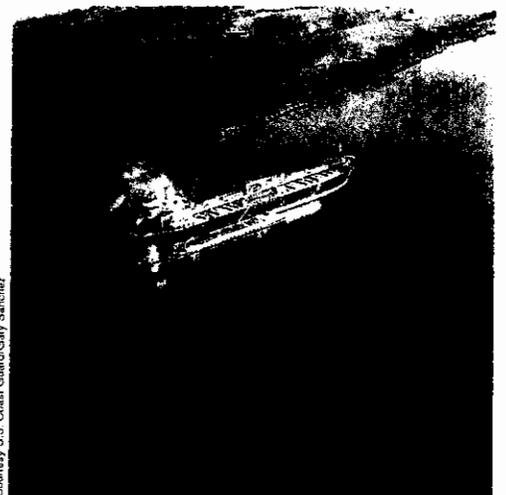
Tomas, was approaching the tanker, which was in the Sun Anchorage. The barge's rub rail struck *Torm Mary* at the starboard aft quarter between 6 and 8 feet above the waterline at a point where the fuel tank and machinery space were separated. The impact resulted in a hole 4 feet long and 6 feet wide in the tanker's hull and caused a leak in the vessel's fuel tank. The cargo tanks, which were full at the time, were not affected. Weather conditions were good at the time of the accident.

The U.S. Coast Guard would not say whether equipment problems or human error were factors in the accident, which remains under investigation.

According to Lt. Ian Bird of Coast Guard Marine Safety Office Port Arthur, the captain of *Torm Mary* immediately began transferring fuel from the leaking fuel tank, and the crew attempted to block the hole in the hull with anything they could find. Booms were deployed and cleanup efforts commenced.

Bird said there was very little damage to the barge.

He said temporary repairs were made to *Torm Mary* on site. The ship then departed to the Gulf of Mexico at 2325 on Aug. 9. Permanent repairs and a class inspection were expected within a month.



Courtesy U.S. Coast Guard/Gary Sanchez

Above left, booms surround *Torm Mary* and *San Tomas* after the tanker and tug were involved in a collision. Above, oil slick is visible on the Neches River near Port Arthur, Texas.

Cleanup efforts continued. Following the incident, a section of the Neches River from Buoy 42 (north of the DuPont plant and the Naval Reserve Fleet) to the Veterans Bridge was closed to all vessel traffic. Coast Guard and state officials examined a 44-mile stretch of the river and determined that 28 miles had been affected by the spill. Cleanup costs are expected to be approximately \$4.5 million.

The river was opened to commercial traffic at 1144 on Aug. 4, although a safety zone has been established just north of the DuPont plant and just to the south of Port Neches Park. Recreational boaters will not be allowed in the safety zone until all of the oil has been removed.

John Snyder

Tugboat hits bottom after pilot heads below for relief

The pilot of the tugboat *Evans McKeil* picked the wrong time to go to the head.

The 2,150-hp tug was pushing a single empty barge, *Ocean Hauler*, upriver on the St. Clair River, at about 7 knots early in the morning on July 10. The St. Clair River forms the border between Ontario and Michigan, south of Lake Huron.

At about 0340 the pilot left the wheelhouse. "He apparently had to use the facilities," said Sgt. Edward

Golden, of the St. Clair County Marine Patrol, in Michigan. "He put the craft on what he assumed was autopilot, and went below. When he came back and checked his course, he apparently didn't realize he was off course."

The barge and tugboat plowed into three docks and a 29-foot-long cabin cruiser and ran aground, according to Golden, causing more than \$100,000 in damages, although there were no injuries. There were six other crew onboard.

The incident occurred about 2 miles north of Algonac State Park. Visibility was good, and the Marine Patrol recommended that the pilot be prosecuted for reckless operation, Golden said.

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Menasha and Paul E tried unsuccessfully to free **Evans McKeil** after it ran aground in the St. Clair River while pushing a barge.

An alcohol test of the pilot was negative, said Corrina Ott of the Commercial Vessel Safety division of U.S. Coast Guard's Marine Safety Office in Detroit. *Evans McKeil* and the barge are owned by McKeil Marine Ltd. of Hamilton, Ontario.

The barge was freed in the afternoon of July 10 by the tugs *Paul E*, owned by McKeil Marine, and *Menasha*, owned by Gordon Marine, of Gananoque, Ontario. *Paul E* towed the barge to Courtright, Ontario.

Efforts to free *Evans McKeil* on



Port Huron Times Herald/Melissa Wawzako

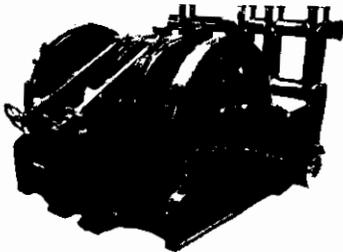
July 10 and 11 were unsuccessful. The vessel was finally freed on the afternoon of July 12 with the help of the workboat *Huron Lady* and

the tug *Manitou*, both owned by Malcolm Marine of St. Clair, Mich., and the tug *Menasha*.

David Tyler

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MARITIME CASUALTIES

Pilothouse staffing levels increased following N.Y. ferry crash

In response to a Staten Island Ferry crash that killed 11 people, the New York City Department of Transportation has begun requiring three people to be in the controlling pilothouse whenever a ferry is leaving or approaching the dock.

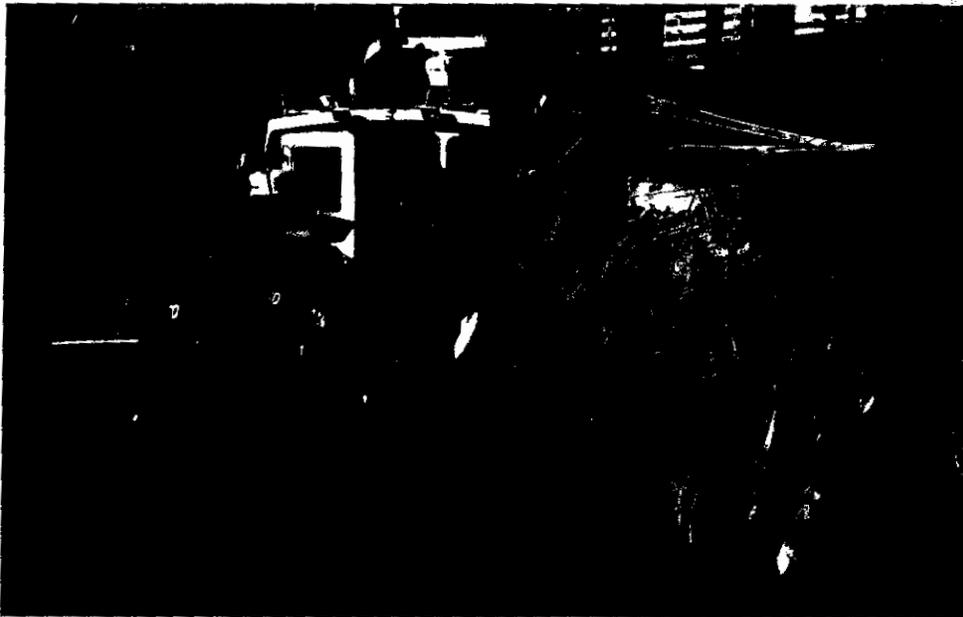
On Oct. 15, 2003, at 1520, the Staten Island Ferry *Andrew J. Barberi*, carrying about 1,500 people, struck a concrete maintenance pier several hundred yards away from its St. George terminal dock on Staten Island. Eleven people were killed and 69 were injured. The 310-foot-long double-ended ferry is 3,335 gross tons and can carry up to 6,000 people. The city DOT operates the eight-vessel system, which transports 65,000 people each day between Staten Island and Manhattan.

The circumstances of the crash have focused attention on the number of qualified mariners who should be in the pilothouse to cope safely with an emergency.

drugs, according to Keith Holloway, spokesman for the National Transportation Safety Board, which is investigating the accident.



Photos courtesy U.S. Coast Guard/Mike Ivozda



Above, damaged areas of Andrew J. Barberi were swathed in blue tarps following a fatal accident on Oct. 15, 2003. Left, a New York City Police Department team searches for pieces of the vessel near the maintenance pier struck by the ferry.

It is still not clear why *Barberi's* assistant captain, who was at the controls at the time of the accident, did not stop the vessel or turn the highly maneuverable boat to avoid the collision. He tested negative for alcohol and

the results of the prescription drug test.

There were also reports that the assistant captain had lost consciousness as the vessel approached the dock, but a nearby crewmember later said the assistant captain

Initial reports indicated that the assistant captain had been taking blood-pressure medication. But subsequent reports said that blood tests after the crash indicated he had not taken any prescription drugs in the 12 to 14 hours before the accident. The NTSB would not confirm

MARITIME CASUALTIES

stood erect and never slumped forward the entire time he was at the helm, according to New York City's Transportation Commissioner Iris Weinshall. She was speaking before a Nov. 4 hearing on the accident before the U.S. House Subcommittee on Coast Guard and Maritime Transportation.

The crewmember said that the assistant captain did not speak in the two minutes before the crash, Weinshall testified. Immediately after the crash, the assistant captain went home and attempted to commit suicide.

Weinshall also cited evidence that the ferry's captain was not in the pilothouse at the time of the crash. City regulations require that the captain be in the operating pilothouse upon docking.

The city of New York has moved to fire both the captain and the assistant captain on the grounds that they did not cooperate with the investigation.

The U.S. attorney for the Eastern District of New York took over the case from state authorities on Oct. 29 and is pursuing a criminal investigation of the accident.

The captain, a U.S. Navy veteran, worked for the Staten Island Ferry system since 1996, and was named provisional captain Feb. 10, 2002, according to Tom Cocola, spokesman for the city DOT. The captain helped save a man who fell overboard in 1991.

The assistant captain, a U.S. Air Force veteran, has worked for the ferry system since 1985 and was named captain July 21, 1996. On May 4, 2003, he was switched back to assistant captain at his request, in order to accommodate his family, Cocola said. It has been reported that the assistant captain was at the controls of a ferry in 1995 when the propeller failed to reverse as it approached the pier. He tried to slow the vessel by heading toward wooden pilings, but it hit the dock, injuring about a dozen people.

Although city regulations required that both the captain and assistant captain be present in the operating wheelhouse, William Bennett, the lawyer for *Barberi's* captain, has said that the rule was not communicated to the crew and not enforced. "I believe that the standard operating procedures that the DOT has been relying on and quoting in the newspapers were never communicated to the captains or assistant captains. (The captain) was acting properly at all times," Bennett was quoted as saying in an article by the Associated Press.

The city transportation department denies that the rule was not enforced. "I know a lot of people are mentioning the whole standard-operating-procedures situation, because some captains and assistant captains have gone to the local media, with anonymity, saying, 'Wait a minute; we never did this,'" Cocola said. "The only

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MARITIME CASUALTIES

evidence we've seen to corroborate that publicly is unnamed sources in newspapers."

"We fundamentally believe that when a boat is in the middle of the harbor, it's the captain who is in charge of the ship," Cocola said.

Cocola said the city has traced standard operating procedures for the Staten Island Ferry back to the 1950s. Those procedures were formalized in 1987 and amended again in October 2001, in response to the terrorist attacks. It is the responsibility of the port captain and the director of ferry operations to supervise the ferry captains, he said. When asked to detail the most recent case of a crewmember being disciplined for not being in the wheelhouse, Cocola replied, "We're still researching that."

As part of the U.S. attorney's investigation, the city was subpoenaed for memos and documents relating to ferry operations back to 1998.

As part of the new rules, the city announced on Oct. 22 that a deck hand will also be assigned to the operational pilothouse at all times. Should the captain or assistant captain be required to leave the pilothouse for any reason, the deck hand can contact that officer immediately via radio. "Let us be clear: During docking, both the captain and the assistant captain should be in the pilothouse at all times," Weinshall said.

All crewmembers were also provided with radios, and a crew check-in system was put in place. All vessels were outfitted with Global Positioning System devices. In addition, ropes are now put up to keep passengers back from the bow on both decks of all vessels "to minimize the risk during hard landings," according to Weinshall.

On Oct. 31, Weinshall announced that the Global Maritime & Transportation School, at Kings Point, N.Y., would begin a review of all ferry operations. Weinshall said that GMATS would investigate vessel operations, human factors, safety issues and management operations. The school is to gather information about the Oct. 15 accident and also review U.S. Coast Guard reports about past incidents.

Ferry crew were to be issued uniforms, and the public address systems on all vessels were to be improved. Starting Oct. 27, city transportation staff began checking vessels at all hours to make sure ferry staff were visible and that the pilothouse was properly staffed.

By adopting the new rules, New York appeared to be catching up with safety standards already in place in other large ferry operations in the United States. Washington State Ferries, for example, has required two licensed officers in the wheelhouse of its vessels at all times for at least the last 30 years.

"It's part of the culture," said Capt. Bill Hughes, who is responsible for navigation electronics and training for the ferry system.

The Washington State Ferries system operates 29 vessels and carries more than 26 million passengers a year. The largest vessels are 460 feet long, over 3,200 gt and can transport 2,500 people, 218 cars and 60 commercial vehicles.

On all trips there is a captain and a quartermaster in the pilothouse. During the night, they are joined by a lookout, according to Capt. Jim Malde, port captain for the Washington Ferries. At times of poor visibility, such as fog, snow, rain or heavy wind, another licensed officer will come to the pilothouse. "You always have a witness in the pilothouse with you," said Malde, who has worked for the ferry system for over 30 years.

This system developed as a way to verify what happens on the bridge. "It's a second set of eyes to be there," Malde said. "Then if anything happens, they are there either to assist or get hold of somebody to help."

Malde said he requires his captains to be vigilant in reporting any damage to vessels or piers and any hard landings. "I put one master back to mate for one year for a hard landing," he said.

Malde could recall only one recent case where injuries occurred as a result of a state ferry colliding with a dock. On June 12, 1998, the 2,477-gt MV *Sealth* hit a dock after its propulsion controls failed, slightly injuring seven passengers and causing over \$2 million in damage to the pier.

The Washington and Staten Island ferries are among the few systems with vessels over 100 gt that transport both people and vehicles, and are classed by the Coast Guard as subchapter H vessels. Most passenger ferry systems in the United States are either under 100 gt and carry more than 150 passengers (subchapter K vessels) or under 100 gt and carry between six and 150 passengers (subchapter T vessels). Although the Coast Guard does provide crew-size guidelines for all ferries, it does not specify the number needed in the pilothouse.

If the Staten Island accident results in rules for minimum staffing levels in ferry pilothouses, the economic consequences for smaller ferry operations could be severe.

Gerry McGovern, who owns RiverLink Ferry System, which operates two vessels under 100 gt that carry 400 and 600 passengers between Philadelphia and Camden, N.J., said that current Coast Guard rules only require one licensed master for subchapter K vessels. To require a second licensed master "would shut the service down," he said.

"Economically, how do you justify paying for that?" McGovern said. "These vessels are small; it's a small-time operation. It doesn't carry the commuter traffic you expect from larger vessels, and the economic justification isn't there."

David Tyler

MARITIME CASUALTIES

Columbia River Bar pilot dies after collapsing on ship

Capt. Paul Jackson, of the Columbia River Bar Pilots, died after collapsing on the bridge of an outbound ship on Oct. 19, 2003.

A crewmember from the pilot boat *Chinook* boarded the ship, bulk carrier *Hoegh Miranda*, within minutes and attempted to resuscitate Jackson. An emergency medical technician from a U.S. Coast Guard 47-foot lifeboat joined in the effort until a Coast Guard Jayhawk helicopter arrived and hoisted Jackson off the ship. He was pronounced dead at Columbia Memorial Hospital in Astoria, Ore.

Jackson, 56, was a graduate of the California Maritime Academy and had worked as a bar pilot since 1986. He lived in Astoria, Ore., where he was well known as the host of a Monday morning radio program.

The collapse of the pilot did not pose a danger to the ship or its crew, according to Capt. Michael Glick, manag-

er of the Columbia River Bar Pilots. "There are always at least four people on the bridge of a ship underway in the river — the pilot, captain, mate and quartermaster — who are all highly trained," Glick said. "The incapacitation of any one of them should not be critical to the safe navigation of the vessel."

In this case, the ship's master did not require any further assistance with pilotage. If he had requested another pilot, an on-call pilot would have contacted the ship by radio to ascertain its position and then would have instructed it to slow down or anchor. The pilot would then have been dropped off at the ship either by helicopter or pilot boat.

All the bar pilots have taken a course in bridge resource management to prepare for emergencies like a member of the ship's bridge team losing consciousness, Glick said.

Peter Marsh

15 killed when Queen Mary 2 gangway collapses at shipyard

A faulty gangway is being investigated as the cause of the deaths of 15 people who were trying to board *Queen Mary 2* at the Chantiers de l'Atlantique shipyard in Saint-Nazaire, France.

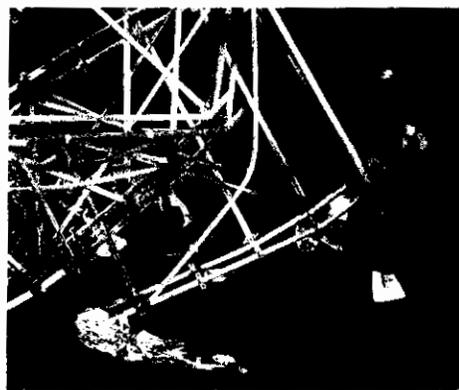
On Nov. 15, 2003, shipyard employees and their relatives were going onboard to see the vessel, which was in dry dock during the final stages of construction, when the 33-foot-long gangway collapsed. About 48 people were on the walkway at the time; they fell about 50 feet to the concrete floor of the dry dock. In addition to the 15 killed, about 30 people were injured in the incident. Eyewitness accounts varied as to whether the gangway buckled in the middle or pulled away from its connection to the quay.

It is a shipyard tradition for friends and relatives of employees to visit a vessel in the final weekends before construction is finished.

Saint-Nazaire prosecutor Pierre-Marie Block said that the

gangway had been changed the day before at the request of shipyard management. Endel, the company that has provided gangways for *Queen Mary 2* since 2002, delivered a gangway that was 3.3 feet wide, when the shipyard wanted one that was 4.5 feet wide, so a new gangway was set up on Nov. 14, according to Block.

Investigators examine the twisted metal of the structure that supported QM2's gangway.



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MARITIME CASUALTIES

Borinquen, according to Boston Eric Willis, a spokesman with the Coast Guard's Seventh District.

Sea Tow, another company that helps stranded boats, also sent out a vessel to look for the missing passengers. Meanwhile, the Sea Rescue vessel and its crew continued on to the marina.

One hour after the search began, the Coast Guard helicopter located the six people who were standing on a reef in about 4 feet of water. One person was immediately airlifted from the reef and received medical attention for cuts and bruises. The remaining five were assisted by the Sea Tow vessel that arrived an hour later, after being directed to the scene by the helicopter. About 20 minutes after that, a Coast Guard small boat arrived to bring the others ashore.

All six passengers told the Coast Guard that they were thrown overboard when the 50-foot towline suddenly jerked their boat.

The Coast Guard's Marine Safety Office San Juan is investigating the incident. The operator of the towboat tested negative for drugs and alcohol.

"We were all lucky that this ended happily," Willis said. "They were lucky it was calm. Sometimes it can be very rough down here."

John Snyder

Destroyer's crew was unaware of ship's position, inquiry told

The officers on the bridge of HMS *Warrington* did not know the position of their ship when the British destroyer struck a charted rock and almost sank in the Tasman Sea in July 2002, a court-martial has been told.

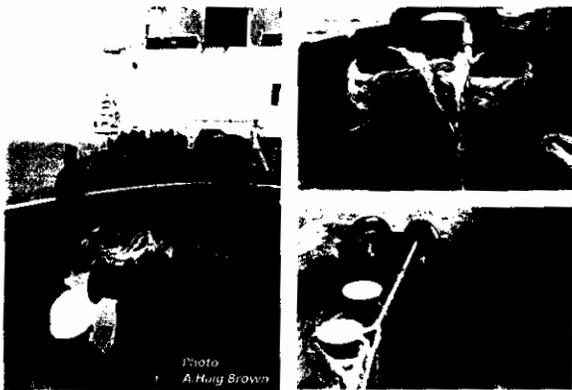
"Not one of the three officers knew where the ship was in relation to the chart, and not one of them paid heed to the developing danger," said Royal Navy prosecutor, Cmdr. Stuart Crozier, at the court-martial.

The Royal Navy Type 42 destroyer with a crew of 253 struck Wolf Rock in the Tasman Sea on July 7, 2002. The accident, involving one of Britain's most modern warships, was a serious embarrassment to the Royal Navy. The economic consequences were also severe. It cost the British government about \$18 million to tow the vessel back to England and an additional \$49 million to repair the ship.

Four of the ship's officers were disciplined as a result of the court-martial, held on Sept. 11, 2003, at

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MARITIME CASUALTIES

the Portsmouth Naval Base. The ship's captain, who was not on the bridge at the moment of impact, was found not to be directly responsible for the grounding and was only reprimanded. Three junior officers — the second in command, the officer of the watch and the navigator — pleaded guilty to charges of negligence. The second in command and the officer of the watch were dismissed from their duties. The ship's navigator was severely reprimanded.

Nottingham was en route from Cairns, Australia, to Wellington, New Zealand, when a crewmember became ill and was taken off the ship to Lord Howe Island. The captain had gone onshore to thank islanders for their help and was returning in the ship's Lynx helicopter, which landed just before the accident.

The ship made several course changes in order for the helicopter to land in 25-knot winds and 12-foot seas. The captain had been onboard ship for less than five minutes and was not on the bridge when it struck Wolf Rock, said Lt. Mark Hankey, a press officer for the Royal Navy.

The court reprimanded the captain for an "inadequate" navigational plan before leaving the vessel.

The court also found that the second in command and the officer of the watch were not experienced enough and that the captain should have taken that into account before he left the ship. It was the navigator's responsibility to check the ship's course.

As the destroyer approached Wolf Rock, the officer of the watch saw breaking waves and said, "What the hell is that? It looks like moonlight on the water," the court-martial was told.

Then *Nottingham* hit the rock.

A set of dividers left on a paper chart may have contributed to the accident, the court-martial was told. Because the dividers covered the position of Wolf Rock, the ship's navigators may not have been aware of the nearby hazard.

"We're not exactly sure who placed them on the chart, but if you're a professional seaman, you know these devices get left on the chart all the time," Hankey said.

There was a lookout on the bridge at the time of the accident. As a result of the incident, the Royal Navy is speeding up its introduction of electronic charts, Hankey said.

The ship sustained several gashes, one as long as



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100 feet, and numerous compartments were flooded. The crew worked for several days to keep the ship from flooding.

Despite disciplining these four officers, Commodore Phillip Wilcocks, president of the court-martial panel, did praise the "immense courage and professionalism displayed by all the officers and ratings in

HMS *Nottingham*." Their actions saved the ship from sinking, he said.

In April 2003, five sailors received the Queen's Gallantry Medal, and an officer was awarded a Member of the British Empire for their efforts to halt the flooding of the ship.

David Tyler and Hugh Ware

Safety board voices concern about unsafe loading of Canadian lakers

Failure to follow the proper loading and deballasting sequence were major factors in the sinking of a Canadian bulk carrier while it was being loaded, according to a report by the Transportation Safety Board of Canada.

Algowood, a 22,558-gross-ton, 730-foot-long vessel owned by Algoma Central Marine Corp. buckled and sank to the bottom on June 1, 2000, while being loaded with aggregates and manufactured sand at Bruce Mines, Ontario. There were no injuries.

The sinking prompted the TSB to express concern about the structural soundness of the rest of the coun-

try's aging laker fleet. All of the country's 70 laker bulk carriers may be "vulnerable to structural failures with serious consequences," the TSB said in its report.

Because Canadian bulkers only operate on the Great Lakes and do not have to comply with the stricter international standards for oceangoing ships, these lakers are built to lower structural, scantling and load-line standards.

"The Board is concerned that mariners may not fully appreciate that deviation from approved loading manuals and loading plans may overstress the structure and lead to catastrophic failures," the report stated.

More importantly, hull problems may not always show up at loading or unloading, and could occur while the vessel is at sea, which could result in the loss of the vessel, the TSB warned.

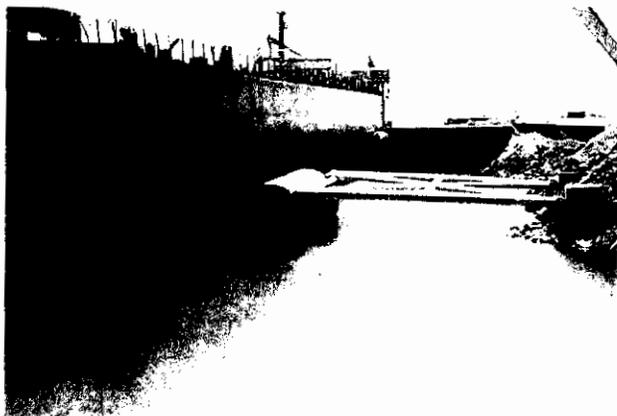
Factors cited by the Board in the *Algowood* sinking included:

- a lack of feedback from engine-room crew to the officer in charge about the progress of deballasting,
- a failure to read draft marks accurately in the dark,
- a last-minute change in loading sequence, which led to extreme stresses on the vessel.

A damage survey done while the vessel was still at

Bruce Mines found extensive buckling and distortion of the shell plating above the waterline on both the port and starboard sides, and localized buckling and fracturing of the side shell and of the port and starboard ballast tank hopper side.

An inspection afterward in dry dock showed structural buckling and extensive fracturing from the turn of the bilge to the bottom shell, port and star-



Above, the hull of Canadian bulk carrier *Algowood* buckled while it was being loaded in Bruce Mines, Ontario. Right, the buckling of the hull resulted in fracture damage to bottom plating in way of the transverse bulkhead between frames 117 and 119.



Canadian Transportation Safety Board of Canada

N.Y. ferry system OKs management reforms in response to Kings Point recommendations

New York City's Department of Transportation (DOT) has begun implementing sweeping reforms of the Staten Island Ferry system in response to recommendations in a report released Feb. 12 by the Global Maritime & Transportation School at the U.S. Merchant Marine Academy at Kings Point.

GMATS was asked to examine the operations and management of the system, following the crash of a ferry in October 2003 that killed 10 passengers. The GMATS report recommended the

creation of the position of chief operating officer to improve oversight of the system. By late March, the DOT had begun interviewing candidates.

That position will pay about \$160,000 and

should be filled by July, according to Tom Cocola, a DOT spokesman.

GMATS will continue to serve as a consultant for the ferry system. Although the length of that relationship has not been defined, "I think we're talking about multiple years," said Brian Holden, division manager for research and special projects at the school.

On Oct. 15, 2003, the 3,335-gt *Barberi*, transporting 1,500 people, struck a concrete maintenance pier several hundred yards away from the St. George terminal dock on Staten Island, killing 10 people. The assistant captain, who was at

the controls at the time of the crash, failed to slow or steer the ferry as it approached land. Even though rules required the presence of both the captain and the assistant captain in the operating wheelhouse, DOT officials claim that the captain was not in the pilothouse.

On Nov. 3, the DOT hired GMATS to assess ferry operations in four areas: vessel operations, human factors, safety and management. The GMATS team was not hired to investigate the accident.

According to the report, the ferry operation is hampered by "a corporate culture within the ferry organization which may not be conducive to operating a first-rate marine transportation system." But Holden said officials from the mayor's office on down have been very cooperative with GMATS and that ferry personnel "wanted to improve and be the best operation they could be."

Two teams from GMATS worked with ferry personnel and city officials from November 2003 through January as part of the analysis of the ferry system's operations. The GMATS report makes the following recommendations:

- Establish a safety management system based on the International Safety Management Code.
- Create a three-member bridge team consisting of licensed deck officers for all vessels. Each member of that team should be qualified in all areas of navigation, communication and other pilothouse technologies.
- Hire a ferry-terminal supervisor, senior port engineer and senior port captain.
- Hire 92 additional crew, including assistant captains, mates and deck hands, and relief personnel. This is needed to run all vessels without requiring crew to



Photo courtesy U.S. Coast Guard/Mark Hvozda

Above, damage done to the interior stairway of the ferry *Barberi* when it struck a maintenance pier, far left, on Staten Island. The ferry system plans to create a new position, chief operating officer, to improve oversight of vessels and their crews.

work too much overtime to meet minimum vessel staffing requirements.

- Perform a salary survey to make sure the ferry system's pay is in line with similar domestic ferry operations.

- Develop and implement comprehensive technical training and professional development for all crew and shore-based personnel. This includes maintaining one vessel in a fully operational status for training.

- Review at-sea casualty and emergency response plans.

- Began planning for implementation of vessel facility security plans.

- Update or install on all vessels automatic radar plotting aids, electronic chart display and information systems, automatic identification systems, and multi-directional speed indicators with alarms.

Cocola said that interviewing of applicants for the crew jobs had begun. He expected one-third of the 92 additional personnel to be hired by the end of the summer. It will cost the city about \$3 million to \$4 million to hire additional personnel, according to Cocola.

The ferry system is also expecting the delivery of three new vessels, he said. After the delivery of the first in the fall, one ferry will be available for training.

David Tyler

Correspondence

by Joel Milton

Poor communication causes a close call on the Delaware

It was a beautiful, sunny winter afternoon in January 2003 when we arrived at the Mantua Creek anchorage across from the Philadelphia International Airport on the Delaware River. We had towed an empty oil barge down from New York Harbor to load at the Girard Point terminal, but our berth wasn't open. With the light barge alongside the tug, we dropped the hook and settled in to wait our turn.

We were also listening with great interest to see how a developing situation within the Delaware's heavy vessel traffic would play out. Coming on watch for the 1200 to 1800 shift, we overheard what later proved to be an unnecessarily and dangerously poor series of communications involving a U.S. Navy cargo ship about 500 to 600 feet in length, its small U.S. Coast Guard escort vessel and the larger merchant ships that needed to pass them. As the vessels approached our

position, we were also able to watch, at close range, the near-collision that resulted from the lack of communication.

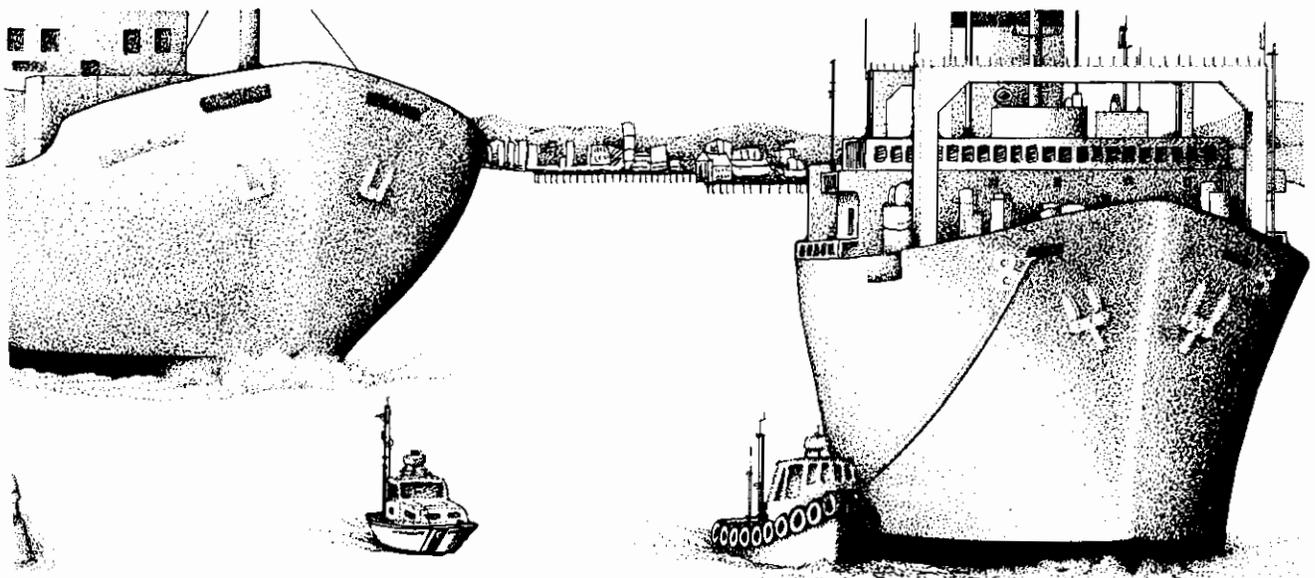
The Navy ship, which had picked up its Coast Guard escort downriver, was northbound above the Commodore Barry Bridge. The Navy ship had just been overtaken by a freighter doing about 16 knots, and a second freighter was closing from astern at a speed slightly faster than theirs. The pilot aboard the second freighter had spent considerable time trying to contact the Navy ship to make passing arrangements.

He eventually succeeded only by jumping in right after the first freighter had finished communicating with the Navy vessel. The first freighter had also had difficulty contacting the Navy vessel initially. It was apparent that, if there was a pilot aboard the Navy vessel, it was probably a Navy pilot who either was not regularly monitoring channel 13 on

the VHF-FM radio, or who was only paying sporadic attention to it.

The Navy vessel was not enthusiastic about being overtaken, and said as much. But the Delaware River pilot aboard the freighter was persistent and informed them that he would, in fact, be passing them. He asked where they would prefer the passing to take place, and it was eventually agreed upon that they would effect the maneuver as they passed the anchorage off Philadelphia's airport. This is a good location for passing because of the deep water in the anchorage, which is south of and immediately adjacent to the channel.

As the situation developed, the Navy vessel reduced speed to dead slow after finding out that it would have to wait for its assist tugs, which were delayed a few minutes while working another ship. The result of this was that they wound up almost dead in the water and some-



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MARITIME CASUALTIES

Six-foot seas cause problems in Nantucket fast ferry's engines

The fast ferry *Flying Cloud* developed problems in both engines as the vessel was two miles away from Nantucket Harbor during a gale on Dec. 2, 2003. As a result of the incident, the U.S. Coast Guard has barred the vessel from operating in seas exceeding 6.5 feet.

The 280-passenger catamaran, with nine passengers and seven crew, was traveling from Hyannis, Mass., to Nantucket in northwest winds of about 25 to 35 knots. *Flying Cloud* is powered by two 1,250-hp Paxman engines, and the hulls are made of aluminum.

Waves were over 6 feet when the starboard engine lost sea suction, according to Lt. John Winters, senior investigator for the Coast Guard's Marine Safety Office in Providence, R.I. The starboard engine went into automatic shutdown at about 1730, according to Capt. Greg Gifford, port captain for the Woods Hole, Martha's Vineyard & Nantucket Steamship Authority, of Woods Hole, which operates the 128-foot-long vessel.

After turning into the waves, a wave struck the vessel in the bow and knocked off what Gifford described as a tonnage panel—a vertical panel attached to the forward-facing bulkhead on the bow. This panel, which measures 4 by 5 feet, protects a luggage area that is not a watertight space. The luggage area has freeing ports and “does not have anything to do with the watertight integrity of the vessel,” Gifford said.

Winters described the panel as a splash guard. “The watertight envelope of the vessel was never in danger,” he said.

Mooring lines are hung on hooks in this luggage section, Gifford said. As water came in, it knocked a mooring line into the water, which then became wrapped around the vessel's port engine shaft, severely reducing power from the port engine. After 20 minutes, the starboard engine was restarted, and *Flying Cloud* made it into port under reduced power.

The mooring line caused a small crack in the fiberglass housing of the port engine shaft, but very little water entered the vessel from this crack, Gifford said.

Winters confirmed that the crack was minor. “The vessel was never in any danger of sinking,” he said.

In early January, the Coast Guard prohibited *Flying Cloud* from operating in seas over 6.5 feet. “The vessel is safe to operate structurally,” Winters said. The problem is how well the engines function in those seas. “We are concerned about the operation of the engines in that sea state.”

Steamship Authority officials said *Flying Cloud* would not run in those seas in any case. “We would not be operating in almost 7-foot seas; that would be certainly wrong,” said Fred C. Raskin, the authority's chief executive. Gifford said the company does not operate *Flying Cloud* from mid-December through March 1 “because there is no call for it.”

David Tyler

Sinking off Scotland leads to questions about watch system



Jambo began taking on water after hitting rocks near Scotland's Summer Isles. The single-hold cargo ship, which was carrying a load of zinc concentrate, sank about four hours after running aground.

The chief officer of the 1,990-gross-ton general cargo ship *Jambo* fell asleep at the helm, causing the vessel to run aground and sink off the coast of Scotland on June 29, 2003, the United Kingdom's Marine Accident Investigation Branch has concluded. All seven of the Polish crew were rescued.



The chief officer had been alone on the bridge for over an hour before the vessel hit a reef off the Summer Isles at 0515 on June 29 in calm seas. He had worked 12-hour days for at least 10 days before the grounding and was unable to sleep before he came onto his shift at midnight, according to the MAIB report.

The AB who served on the bridge with the chief officer was off doing rounds starting at 0355, leaving the chief officer alone. *Jambo's* master ordinarily required an AB to be on the bridge between 2200 and 0600, during periods of poor visibility or when close to land, according to the report. The AB acted as lookout on the bridge during this period but was

also required to check the engine and accommodation rooms every hour. The AB on this watch was a heavy smoker and was given permission by the chief officer to smoke in the mess room during his rounds, since he did not permit smoking on the bridge.

The chief officer fell asleep between 0405 and 0415, missing a course change that would have taken *Jambo* northeast through the Minches, the straits between northwest Scotland and the Outer Hebrides. During that watch, the chief officer was working on voyage and cargo reports and on paperwork for the company's safety management system.

The vessel struck rocks that opened a hole in the bow. The U.K. Maritime & Coastguard Agency dispatched three vessels to the scene. The crew were taken off the vessel, with no injuries, by *Lochinver* of the Royal National Lifeboat Institution, between 0721 and 0859. *Jambo* sank at about 0930.

The Cypriot-flagged vessel was owned by Accent Shipping Co. Ltd. and managed by Reederei Hesse GmbH & Co.



Photos courtesy U.K. Maritime & Coastguard Agency

CORRESPONDENCE

The first consequence of fatigue is loss of judgment

by Mike Adams

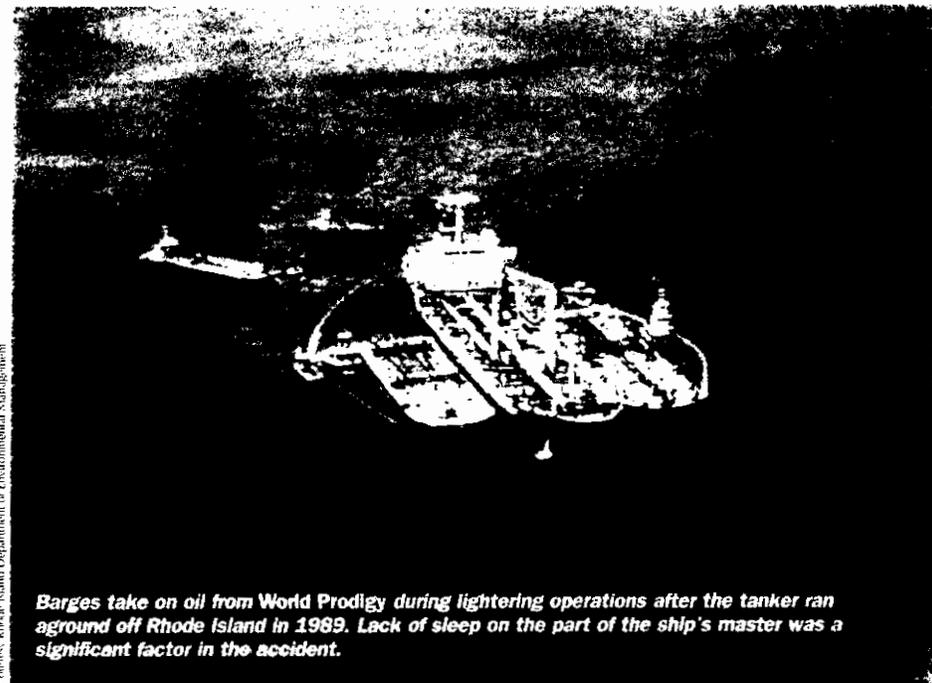
Every professional mariner gets tired. The physical and mental challenges of working aboard a vessel, the lack of "normal" sleep patterns due to standing watches and unexpected changes to schedules all combine to cause fatigue. And fatigue, as numerous studies have shown, leads to mistakes.

Consequently, every professional mariner makes mistakes. Most of our mistakes are caught and corrected before they become a crisis. Before we look at the regulatory and common-sense tools that help us overcome fatigue and thus avoid making mistakes, let's look briefly at two cases where fatigue directly contributed to catastrophe.

The tankship *World Prodigy* with a cargo of 195,000 barrels of diesel fuel approached the entrance to Narragansett Bay on the afternoon of June 23, 1989. *World Prodigy* was no Third World rust bucket. Not quite three years old, she had a satellite navigation system, Decca, loran, radio direction-finder, two radars, two VHF-FM radios, multiple gyrocompass repeaters and rudder-angle indicators, and telephones for intraship communications.

Nonetheless, ships are run by people. *World Prodigy's* watch officer called his captain to the wheelhouse at 0500 on June 22 because of the New England summer fog and fishing vessels. Having had just about six hours of sleep, the captain began conning the ship so the mate could concentrate on navigation and monitoring the radars.

The captain stayed on the ship's bridge all day, through the night, and into the next morning taking only short breaks to eat and getting occa-



Barges take on oil from *World Prodigy* during lightering operations after the tanker ran aground off Rhode Island in 1989. Lack of sleep on the part of the ship's master was a significant factor in the accident.

sional, brief naps on a couch on the bridge. But those naps were short, and he was up far more than he was resting.

By 1600 on the afternoon of June 23, the visibility had increased to 10 miles. The captain continued to conn *World Prodigy* because the ship was about to embark a pilot. He reduced speed, shifted the steering from automatic to manual and sent the lookout below to assist the boatswain in rigging the pilot ladder.

Then *World Prodigy* received a telex directing her to offload at two terminals instead of one and asking the master to calculate, "as soon as possible," the ship's estimated draft after the first offload. *World Prodigy's* captain sent the on-watch chief mate below to use the ship's stability computer to make the computations. This left the captain alone in the wheelhouse except for the helmsman.

At 1628 the master ordered "dead slow ahead," but *World Prodigy* was still making over 4 knots as the captain fixed his position and spoke with the pilot boat. After 10 minutes, he grew impatient with the chief mate's tardiness in completing the draft calculations. So the captain went to the back of the wheelhouse and began doing his own computations using a pocket calculator. This left the helmsman as the only person in the forward part of the bridge.

Two minutes later the pilot boat saw *World Prodigy* and told the captain to make an immediate 90° course change to port. Before the master could respond, *World Prodigy* struck a rocky ledge, damaging 16 cargo tanks and spilling 300,000 gallons of diesel oil into Narragansett Bay. The captain had, by then, been up and on watch for almost 36 hours.

Not surprisingly, the National Transportation Safety Board found that the captain's "acute fatigue" was the probable cause of the ship's grounding. Mishaps involving less obvious cases of fatigue also exist.

In June of 1995 the passenger vessel *Star Princess* was making a routine voyage along the Alaska Inside Passage. State law mandated that ships transiting these passages have two licensed pilots onboard so that one of the pilots could continuously direct the vessel's movements while the other rested.

So it was on *Star Princess*. The two pilots shared watch-standing duties on a six-on, six-off basis until the ship arrived at Skagway early on June 22. When *Star Princess* departed for Juneau late the same day, the pilots decided to split the remaining 10.5 hours of watch in half.

The second pilot came on watch at about 0040 on the morning of June 23. At 0125 he sighted *Fair Princess* on a reciprocal course about 6 miles to

the south. Neither *Star Princess*' nor *Fair Princess*' pilot was concerned; both believed their ships could pass port-to-port between the navigational hazards of Poundstone Rock to the west and Sentinel Island to the east without colliding. At 0142, with *Fair Princess* on her port bow at a safe distance, *Star Princess*' starboard side grounded on Poundstone Rock. The passengers were all debarked from the damaged ship. Repairs and loss of revenue during repairs amounted to more than \$27 million.

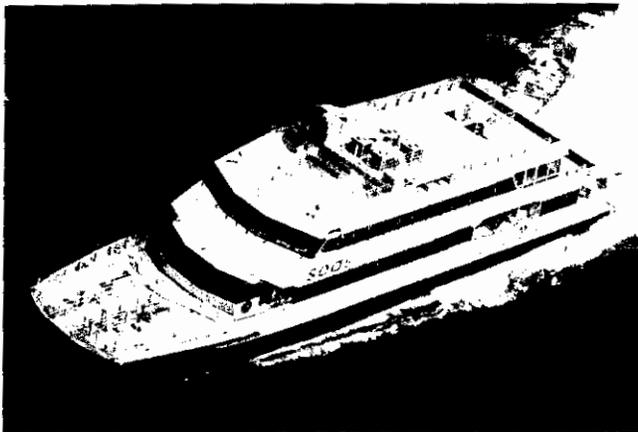
Star Princess' pilot had been on watch for less than an hour. In the 24 hours before that he had a total of about five and a half hours on watch. In the 12 hours before that, he had two hours of watch. In other words, he had more than 27 hours of rest in the 36 hours before the grounding, including 18 continuous hours without duty just before his final watch. Nonetheless, he was suffering from fatigue. How can this be?

This man had a disorder known as

sleep apnea, a condition in which a sleeping person stops breathing, causing him or her to wake up suddenly. This waking may occur hundreds of times each night, but it is so short in duration that the individual often does not realize he or she woke up. Nonetheless, anyone who wakes up this much each night is going to be tired. The pilot's sleep apnea was not diagnosed until after the grounding. He was tired and no one, not even he, suspected it.

Here then is the first step to counteract fatigue: Guard against undiagnosed sleep disorders. Routine medical examinations may turn up such problems. (Or they may not, as was the case for the pilot of *Star Princess*.) It is more likely, however, that those who know an individual best (spouse, parents, children, shipmates) will see the symptoms of chronic fatigue that mean a thorough evaluation is in order.

However, individuals with genuine sleep disorders are rare: Less than 10



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percent of everyone in the country suffers from sleep apnea. For the remaining 90 percent of the population, the most obvious solution for fatigue is to get adequate rest each day. Most humans need eight hours of sleep, preferably eight continuous hours, in a 24-hour period. That is often difficult for shipboard watchstanders. Even a four-on, eight-off watch schedule will barely provide eight hours of continuous rest, and many smaller workboats have a six-and-six watch schedule.

Lately some companies have been experimenting with a nontraditional watch-standing schedule that guarantees each watch stander a continuous off-watch period of at least 10 hours to improve the probability of eight continuous hours of sleep.

Even if we are getting the required amounts of sleep, there is one more thing that will cause us to suffer fatigue: work. That sounds obvious, but at the end of watch, whether it is midnight or eight in the morning, the watch stander is tired. And, being tired, he or she will begin to suffer from fatigue no matter how much rest he or she got before watch.

The Code of Federal Regulations now includes the STCW (International Convention on Standards of Training, Certification and Watch-keeping for Seafarers) rest standards, which mandate a minimum of 10 hours off watch in any 24-hour period, including at least six continuous hours of rest. Other CFR work-rest rules pre-date STCW and are still in effect. Furthermore, the Oil Pollution Act of 1990 (OPA '90) imposes still other rest requirements for tanker crews.

Despite these regulations, there are court cases that indicate a reluctance by the legal system to enforce these rest rules in favor of the mariner. Furthermore, there are gray areas in the regulations that seem to allow, or even encourage, additional work hours. Thus, since the rules alone will not solve the problem, professional mariners must seek other solutions.

Formal studies about fatigue tend to prove the very things we know from our own experience. When we're tired,

we overlook things, our perceptions diminish, we become impatient with ourselves and others, we find it difficult to concentrate, and we tend to concentrate on one thing to the exclusion of all others.

Knowing the causes and consequences of fatigue, what are the symptoms we can watch for? The first is impaired judgment. Unfortunately, that means the fatigued individual may not realize that he or she is tired.

Thus we must learn to watch for signs of fatigue not just in ourselves, but in our shipmates.

Secondly, someone who is tired becomes less willing to talk about anything, let alone his or her fatigue. Once again, trying to tell someone else that he or she is tired means an uphill battle against the effects of fatigue.

Third, an individual suffering from fatigue is more likely to make mistakes or simply not do some things that

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should be done; i.e., take shortcuts. Simultaneously, someone with multiple jobs to do may concentrate on just one task while ignoring others, thus getting even further behind, leading to more shortcuts and a downward spiral in performance.

How do we deal with all this?

We can overcome the third consequence of fatigue, shortcuts and errors, by using standardized procedures and checklists. When we stop following our normal procedures, we have to ask ourselves if those changes are being caused by fatigue.

World Prodigy's captain effectively left his helmsman alone in the wheelhouse as the ship approached the pilot station, counter to his usual practice. Even though he had asked for another mate to come to the bridge, when that mate did not show up, the captain never got anyone else.

The second consequence of fatigue, decreased communication, is the most difficult to overcome. If someone ignores us, we tend to ignore him or

her in return. *Star Princess'* pilot not only failed to make radio contact with *Fair Princess*, he had not even discussed his ship's navigation with his own crew for almost 30 minutes prior to the grounding. Poor communication was also a factor in the *World Prodigy* grounding. Although the captain talked with the pilot boat about his arrival, he misunderstood the location of the boarding area. Rather than ask for clarification, the captain remained silent.

The first consequence of fatigue — loss of judgment — is perhaps the most dangerous. Since *World Prodigy's* captain understood his responsibilities for the safe navigation of his ship, he had been on the bridge for almost a day and a half because of the fog and heavy traffic. Since he also understood his chief mate's duties, he told the chief mate to do the draft calculations. He even had the good sense to call for another officer to join him on the bridge as the ship approached the pilot station.

But then his judgment faltered. When the extra mate did not show up, he made no attempt to locate anyone else to assist him. When the draft computations took more than 10 minutes, he started his own calculations. Alone on the bridge except for the helmsman, he began to assume all duties (lookout, navigator, ship handler, radar observer, stability calculator, radio operator, supervisor).

Deteriorating judgment, concentration on secondary matters and failure to communicate, all hallmarks of fatigue, were the characteristics shown by *World Prodigy's* captain in the minutes before his ship grounded.

We must learn to understand the causes of fatigue, recognize its symptoms, and do something about it if we are to avoid *World Prodigy's* fate. •

Mike Adams is a master mariner and captain of a large oil spill response vessel. He is a Coast Guard-certified STCW instructor for bridge resource management and basic safety.

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Tanker spills crude oil in the Delaware River near Philadelphia after hitting cast-iron pipe

What may prove to be the largest oil spill in the history of the heavily trafficked Delaware River occurred on Nov. 26 when a 15-foot piece of cast-iron pipe pierced the hull of a Cypriot-flagged oil tanker as the ship was approaching its berth.

ing from the tanker. At about the same time, *Athos I* developed an 8° list to port and lost power. The crew quickly located the leak and transferred the oil to other tanks to avoid further spillage.

The following day, divers found a

6-foot gash in the No. 7 center cargo tank and the No. 7 ballast tank. Another underwater inspection on Nov. 28 revealed a smaller puncture near the larger gash.

Initially, 30,000 gallons was thought to have leaked from the tanker. That estimate was raised to 473,500 gallons on Nov. 30 by Capt. Jonathan Sarubbi, the U.S. Coast Guard captain of the Port of Philadelphia.

It was unclear if the missing oil spilled into the river or flowed into other spaces on the ship, such as ballast tanks. If the oil did end up in the river, the loss would surpass the record for the Delaware of 300,000 gallons spilled by a tanker that ran aground near Claymont, Del., in 1989.

After entering Delaware Bay on the afternoon of Nov. 26, *Athos I* paused briefly off Cape Henlopen, Del., to take on a pilot from the Pilots' Association for the Bay and River Delaware, and two security guards from the U.S. Coast Guard. The 21-year-old single-hull tanker rode the tide up the Delaware, drawing 36.5 feet in the 40-foot-deep ship

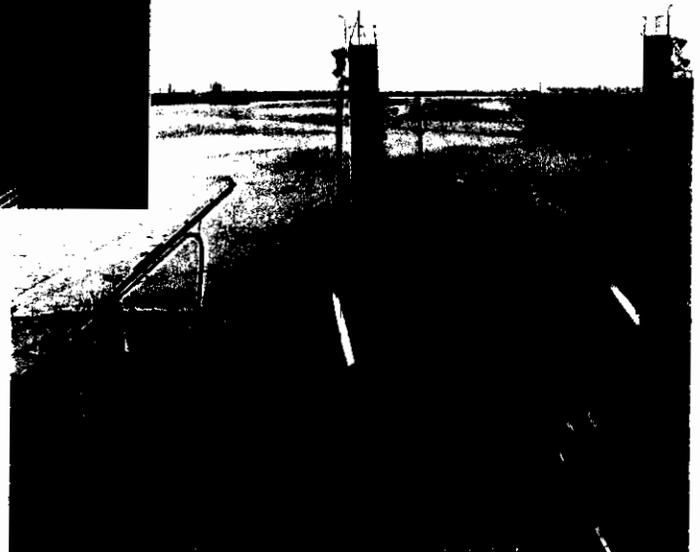


Photos courtesy U.S. Coast Guard

The incident occurred around 2115 as the 750-foot *Athos I* approached the Citgo asphalt refinery in West Deptford, N.J., with a cargo of 325,000 barrels, or nearly 14 million gallons, of heavy Venezuelan crude oil.

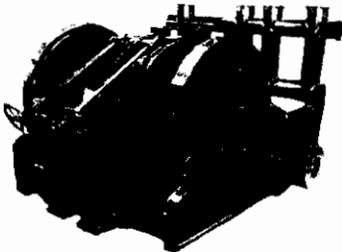
Crewmembers aboard two assisting tugboats noticed an oil slick com-

Athos I began listing 8° after it struck a pipe on the riverbed. The ship was carrying more than 13 million gallons of crude oil. An estimated 470,000 gallons spilled into the river. Right, the remaining oil was transferred from the tanker to lightering barges.



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channel. At about 2100, after passing beneath the Commodore Barry Bridge and with a docking pilot aboard, *Athos I* made a 90° turn to starboard to approach the Citgo dock.

There is no evidence at this stage of the investigation to indicate any piloting or navigation errors, the Coast Guard said.

Four days after the accident, the slick from *Athos I* covered a 44-mile stretch of the Delaware from the Tacony-Palmyra Bridge that links Burlington County, N.J., and north-east Philadelphia to the Salem, N.J., nuclear power plant on Artificial Island about five miles downstream from the Delaware Memorial Bridge.

The power plant was shut down for several days after the spill, when the slick came dangerously close to its cooling-water intakes. Oil containment booms were placed around the intakes, and the power plant was not damaged, according to the Public Service Electric & Gas Co., the plant's operator.

The concentration of spilled oil was heaviest along the 10-mile stretch of the river between the southern end of Little Tinicum Island off Essington, Penn., and the Schuylkill River, which enters the Delaware at Philadelphia.

The heavily industrialized Port of Philadelphia was closed for three days while salvage teams and environmental cleanup workers descended on *Athos I*. Nearly 50 ships, primarily tankers and bulk carriers, were held either at their riverside berths or at the Big Stone Beach anchorage in Delaware Bay.

The port was partially reopened on Nov. 30, significantly easing congestion that was rapidly building up and down the Delaware. Twelve ships entered the port and three departed

when the Coast Guard gave them the green light. An additional 23 were waiting to depart, and another 25 were either in Delaware Bay or at sea waiting to come upriver, according to the Coast Guard.

The ship's owners, Tsakos Shipping and Trading SA, quickly assumed responsibility for the spill and said it occurred as the ship struck a submerged object while moving slowly toward its berth.

Initially, speculation about what *Athos I* might have struck ran the gamut from spikes planted in the river bottom to impale British warships during the Revolutionary War, to lost equipment or sunken vessels that have accumulated on the bottom over the centuries. Then on Dec. 7, divers found the 15-foot-long curved pipe.

The pipe was located by sonar in the anchorage about 700 feet from the Citgo dock. Preliminary tests of paint scrapings from the pipe and *Athos I* showed a positive match. *Athos I*'s GPS track indicated that the tanker had passed over the pipe as it approached the dock.

The pipe was recovered for further testing, the Coast Guard said.

Before the discovery of the pipe, attention had focused on a 14-foot-diameter propeller and section of propeller shaft that were lost from the U.S. Army Corps of Engineers dredge *McFarland* on April 23, 2004. *McFarland* lost the propeller and shaft near the spot where *Athos I* is believed to have struck an underwater object. The channel was closed for three days, but sonar surveys failed to find any trace of the propeller.

Still unknown is just how much oil was recovered either from the river or the shoreline, how much is floating below the surface and how much is



Senior Agent John Meehan, of the U.S. Fish and Wildlife Service, shows a Canada goose that died as a result of the oil spill. In addition to the environmental damage, the accident resulted in the closing of the Port of Philadelphia for three days. A nuclear power plant in Salem, N.J., was forced to close for several days when the oil slick came close to the plant's cooling-water intakes.

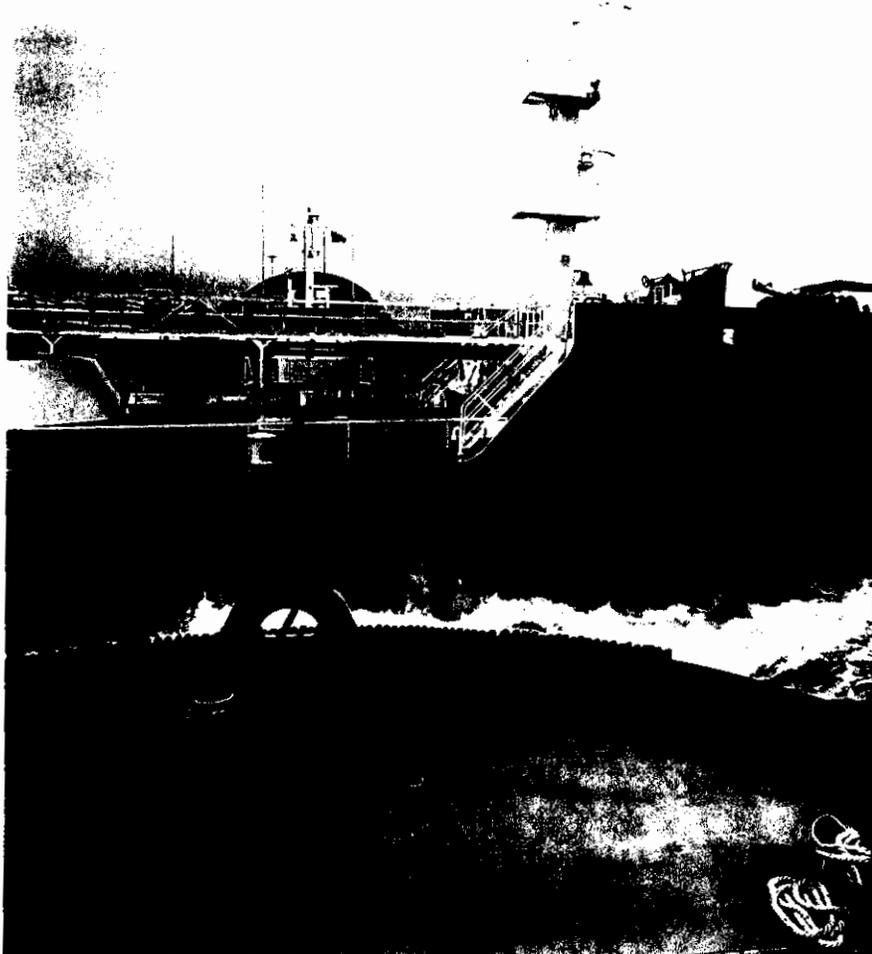
Courtesy U.S. Coast Guard

lying on the bottom, like a huge asphalt cap.

To prevent oil-stained hulls from possibly spreading the heavy crude oil throughout the river, outgoing ships were required to have their waterlines cleaned with high-pressure steam. The decontamination process was made discretionary after the first few days, the Coast Guard said.

The day after the port captain reopened the river, he imposed a new restriction, presumably to last until the lost-propeller question is resolved. Under the new decree, vessels drawing more than 34 feet can operate in the 40-foot-deep channel only at high tide.

Tony Muldoon



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Two men presumed dead after tug sinks while towing barges in Strait of Georgia

Two crewmen are missing and presumed dead after their tug sank about 50 miles northwest of Vancouver, British Columbia.

The 44-foot tug and its two-person crew were towing construction barges from New Westminster on the Fraser River to Texada Island in the Strait of Georgia.

According to Peter Ward of the Transportation Safety Board of

First in the tow, the 133-foot *McKenzie* carried a 200-ton crane with spuds. *M.B.D. 32* was open-decked.

The tug and tow left New Westminster at about 1700 on Nov. 5, 2004, anticipating a 12-hour passage. After leaving the Fraser River and passing Sands Head Light, *Manson* entered the Strait of Georgia, where its course was monitored

by Victoria Marine Communications and Traffic Services (MCTS).

Weather conditions were described by the Canadian Coast Guard as poor, with rain, a south-east wind of 30 to 35 knots, and 4- to 5-foot following seas. *Manson* continued on its northwesterly course and entered the Comox MCTS zone at 0230. Just before switching frequencies to Comox, a radar observer at Victoria MCTS advised the tug that the after barge might have broken loose. This information was relayed to Comox MCTS, which asked the tug if it had indeed lost a barge. *Manson* confirmed that it had but that the situation was "under control."

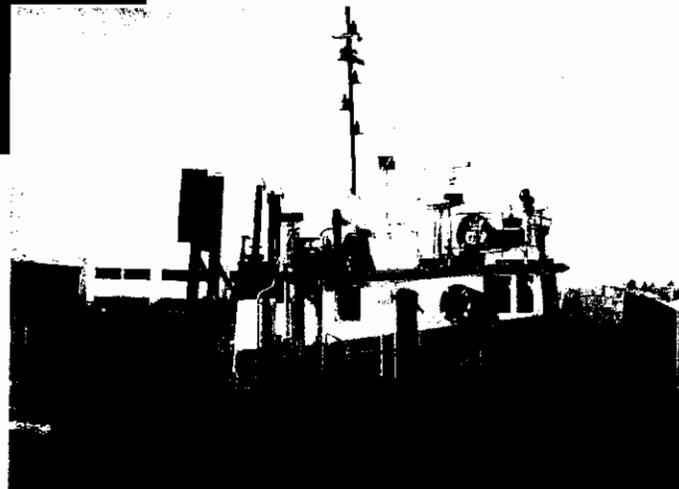
Comox MCTS continued to monitor the tug's progress over the next half hour. At 0310 the tug contacted Comox MCTS to say that it was having difficulty steering but did not require assistance. This was the last communication from *Manson*.

At 0330 the Victoria Joint Rescue Coordination Centre received a signal from an EPIRB registered to the tug, and rescue efforts commenced. Three Canadian Coast Guard vessels, three nearby tugs



Canada, the tug *Manson*, owned by Empire Tug Boats Ltd., of New Westminster, was towing two barges on a 1,000-foot wire hawser. The barges, *McKenzie* and *M.B.D. 32*, were connected to each other by a 250-foot synthetic pendant in a tight towing configuration commonly used on the Fraser River.

Above, *M.B.D. 32*, an open-deck construction barge, was linked to a crane barge by a 250-foot-long synthetic pendant. Right, the barges were being towed by *Manson*, a 44-foot tug shown here in an older photo.





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and a Canadian Armed Forces Buffalo aircraft and a hovercraft aided in the search for survivors.

Ward said search crews found a trace of oil and some debris, including the tug's empty life raft, which had been deployed by hydrostatic release, but they found no trace of the two men or the tug. Searchers abandoned hope of finding the men alive on Nov. 8 and turned their efforts to retrieving the bodies and locating the tug.

The drifting *M.B.D. 32* was picked up by one of the assisting tugs. *McKenzie* remained stationary on the scene, leading rescuers to believe the tug was at the other end of the tow wire, which led straight down into the water. Neither of the barges showed any evidence of damage. Sonar and a video-equipped submersible device were used to search for the tug, but still nothing was found.

Ward said a decision was finally made to haul up the tow wire. It came up with ease, and once recovered, the bitter end failed to indicate any break or damage except for a minor kink about 12 feet long.

According to Ward, the TSB is exploring a number of scenarios that may have caused the vessel to sink. One strong possibility is that a following sea may have flooded the lazarette containing the steering gear. This could have happened if an access hatch had been left open while the crew tried to determine the cause of the steering problem.

The good condition of the tow wire suggests that it unwound from the drum. Ward said that raised questions about how that could have happened. Was it deliberately released by the crew in an effort to

drop the tow, or did the hydraulic brake slip as the vessel sank?

Ward noted the sinking might also spark a safety discussion of crew requirements. Although the tug met Canadian crew requirements for the trip and the captain was an experienced mariner knowledgeable about the route, bad weather, minimal crew, two barges and the fatigue of nine hours on watch may have contributed to the tug's difficulties.

This is the third time *Manson* has sunk. The first occurred dockside when the engine room flooded while the tug was taking on fresh water. Apparently the water supply line was left open; when the tanks were full, the overflow passed through vents and into the bilge.

The second incident was in June 2000, while *Manson* was maneuvering a crane barge. The tug was stemming a river current during a freshet, when the tug was pinned against the barge by debris and took on water. There were no fatalities in either of the incidents. Since the last sinking, the tug was completely refitted and, according to Transport Canada spokesman Rod Nelson, has had "clean inspections." The tug's current inspection certificate was due to expire in 2005.

Initial attempts to locate the tug were hampered by bad weather and the depth of the water, about 800 feet, but searchers still have hope that it will be found. Ward said it would be very difficult to determine the cause of the sinking without recovering the vessel.

John Manley, an owner of Empire Tug Boats, described the vessel as sound.

John Snyder

Natural-gas platform off Texas catches fire after being struck by 355-foot freighter

An unmanned natural-gas transfer platform, High Island 207, caught fire after being struck by the freighter *SCM Athina* about 17 miles off the coast of Galveston, Texas. The collision occurred on Nov. 5, 2004, at around 0300.

The 355-foot *SCM Athina* was outbound from Houston, bound for Freeport, Texas, in clear weather and 3- to 4-foot seas. At 0315, watchstanders at U.S. Coast Guard Station Galveston received a call reporting an offshore fire that could be seen from land. That call was followed by a 0330 call from *SCM Athina* confirming that the vessel had hit an unmanned platform.

Two crew vessels that were in the vicinity, *Deanne McCall* and *Seabulk Star*, extinguished the blaze on the lower decks of the platform, according to Lt. Nick Wong of U.S. Coast Guard Marine Safety Unit Galveston.

Lorne Clay, captain of *Seabulk Star*, said he was asleep when his crew alerted him to flames on the horizon. Clay said he and his crew readied their firefighting equipment and immediately headed for the burning platform to see

if they could help. They used their vessel's fire monitor to help extinguish the blaze on the lower platform.

Once on the scene, the Coast Guard and emergency response crews from EOG Resources Inc., the company that owns the transfer platform, conducted a preliminary assessment of the damage and secured all of the gas lines by midmorning. However, the firefighting equipment on the good-

The platform was marked and well lit, but there were no aids to navigation in the immediate area.

Samaritan vessels did not have the range to reach the upper deck of the platform, and the upper deck fire continued to smolder during the day until finally extinguishing itself.

Elizabeth Ivers, a spokeswoman for Houston-based EOG Resources said

her company was still trying to determine the extent of the damage and could not yet estimate the cost of repair.

SCM Athina's starboard superstructure was seriously damaged, and the vessel's starboard hull received minor scrapes above the waterline. Its starboard lifeboat was totally destroyed.

The Coast Guard directed the freighter and its crew of 16 Russians to the Galveston Fairway Anchorage about 15 miles away, according to Lt. Joe Leonard, an investigator with MSU Galveston. At the anchorage, the Coast Guard boarded the vessel to interview the crew and assess the damage. Once deemed seaworthy by the Coast Guard, *SCM Athina* was allowed to proceed to Houston for further inspection and repairs.

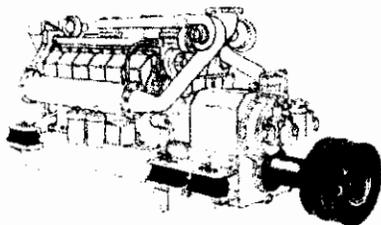
Wong said the platform was marked and well lit, but he noted there were no aids to navigation in the immediate area. Wong said the case was still under investigation and the investigators would be looking into a number of possible causes, including mechanical failure. He said the accident did not result in any injuries or pollution.

SCM Athina is registered in Antigua and Barbuda, and is owned by Sudkap Shipping Co. Ltd.

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Bridge closes early, nearly severing Boston tug's raised helm station

Michaela McAllister, a 124-foot tugboat, was damaged Nov. 7, 2004, when a bridge in the Boston area was lowered before the tug had passed through.

The Andrew McArdle Bridge, which spans the Chelsea River between East Boston and Chelsea, Mass., struck the tug's raised helm station. The accident happened at about 0450 in clear, calm weather, as the boat, owned by McAllister Towing, of New York, was passing through the 225-foot manned bascule bridge.

According to Lt. Keith Hanley of U.S. Coast Guard Marine Safety Office Boston, three light tugs were headed up the river from Boston Harbor. The harbor tugs *Liberty* and *Freedom*, owned by Boston Towing & Transportation Cos., of East Boston, were preparing to assist a ship, and *Michaela McAllister* was going to pick up a tow. The three tugs waited near each other for the bridge to open and then proceeded through. *Liberty* and *Freedom* passed without incident; but as *Michaela McAllister* passed through the opening, the bridge began to close and then struck and bent the 40-foot-high aluminum helm structure. There were no injuries, Hanley said.

When the accident occurred, members of the crew were on deck at the stern of the tug, where they had been making up lines on deck in preparation for their tow.

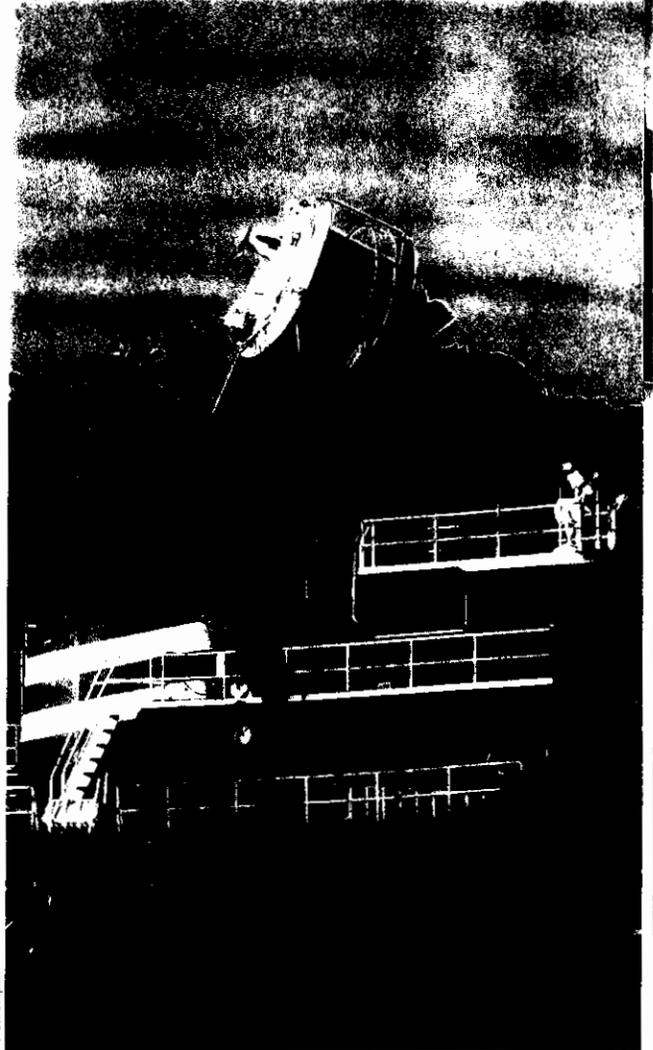
Blaine Bisenga, mate aboard the 92-foot *Freedom*, said all three tugs were "stacked up" while waiting for the bridge to open and would have been in sight of the bridge operator. The Coast Guard could not confirm

the position of the tugs and said there was a sharp turn to be made as vessels approached the bridge. While inbound to the bridge from Boston Harbor, Bisenga radioed the bridge operator to say that two boats, *Liberty* and *Freedom*, would be coming through shortly. Immediately following his communication, Bisenga said he heard the *McAllister* tug tell the bridge operator that it would be following the other two through. Bisenga said he then heard the bridge operator acknowledge the third boat.

Bisenga said he heard the closing horn from the bridge but did not look astern as *Freedom* and *Liberty* made their way up the river. *Liberty* and *Freedom* continued on, and *Michaela McAllister* proceeded to Boston Towing's dock so the damaged helm could be removed and secured to its deck for transport to the repair yard.

In a conflicting report, the Boston Police Department's Harbor Patrol Unit interviewed the bridge operator. The bridge operator told police he had only communicated with two tugs, *Liberty* and *Freedom*. After they passed he said he signaled that the bridge was about to close. Supervisor of Bridges for the City of Boston, John Doherty, could not be reached for comment.

Brian Buckley McAllister, vice



Michaela McAllister was the last of three tugs passing under a bascule bridge over the Chelsea River when the span was lowered prematurely.

president and general counsel for McAllister, said his company is holding the bridge operator responsible for the accident. He said damage to the tug amounts to "hundreds of thousands of dollars" and will put 1 1/2 crews out of work until the repair work is completed. McAllister said he is grateful no one was in the upper wheelhouse at the time and that "none of the guys working on the back deck were injured."

John Snyder

Barge punctures hull of docked cruise ship

A barge punctured the hull of a cruise ship docked at Pier B at the Hilton Key West Resort & Marina in Florida on Nov. 5, 2004.

The 66-foot tug, *Huey L. Cheramie*, owned by IMMC/Huey L. Cheramie Inc. of Galliano, La., was pushing a 166-by-40-foot empty dredge spoil barge when, at about 0800, the barge struck the 916-foot *Enchantment of the Seas*, operated by Royal Caribbean Cruises Ltd. The accident left a 6-foot-long hole the shape of a football and a 50-foot scrape about 6 feet above the waterline on the cruise ship's port bow, according to Royal Caribbean spokesman Michael Sheehan.

The tug and its tow were in the Key

West Harbor channel passing alongside the moored ship, port to port, when the barge hit, according to Petty Officer Ryan Doss of the U.S. Coast Guard Marine Safety Office Miami.

Ensign Josh Harrington, a spokesman at Coast Guard Station Key West, said the channel adjacent to Pier B is 300 feet wide. Given the width of the channel and sufficient depth of water to either side of it, Harrington did not think the area posed any unusual challenges to navigation for a tug and tow of this size. Weather conditions at the time of the accident were reported to be good.

The Coast Guard and representatives of Royal Caribbean worked quick-

ly to assess the damage, and temporary repairs were made at the wharf. Once the repair work was inspected and approved by the Coast Guard, *Enchantment of the Seas* was permitted to continue on its four-day itinerary, which included a stop in Mexico.

"The ship was not delayed very long," Doss said. "Their departure was only delayed a few hours."

The crew of the tug was tested for drugs and alcohol, but the results were not yet available.

The accident did not result in any injuries or pollution, Doss said. *Enchantment of the Seas* was carrying 2,040 passengers and 741 crewmembers. The accident remains under investigation.

John Snyder



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Container barge runs aground in Florida after breaking towline

A parted tow wire led to the grounding of a 250-foot container barge on jetties at the mouth of the St. Johns River near Jacksonville, Fla., on Nov. 11, 2004.

The tug *Spence* was towing the 6,000-ton container barge *Guantanamo Bay Express* when it broke loose and ran aground on the north Mayport jetties. The tug and tow, both operated by Transatlantic Lines LLC of Jacksonville were en route to the U.S. Naval Station at Guantánamo Bay, Cuba.

The tug and tow departed the port in winds up to 30 knots and 12-foot seas. At around midnight, soon after the vessels left the dock, the tow wire parted, said Chief Warrant Officer David Cook, a spokesman with the U.S. Coast Guard Seventh District in Jacksonville. The loaded barge drifted and grounded on the rocks of the nearby jetty.

Titan Maritime LLC of Fort Lauderdale, Fla., was contracted by Transat-

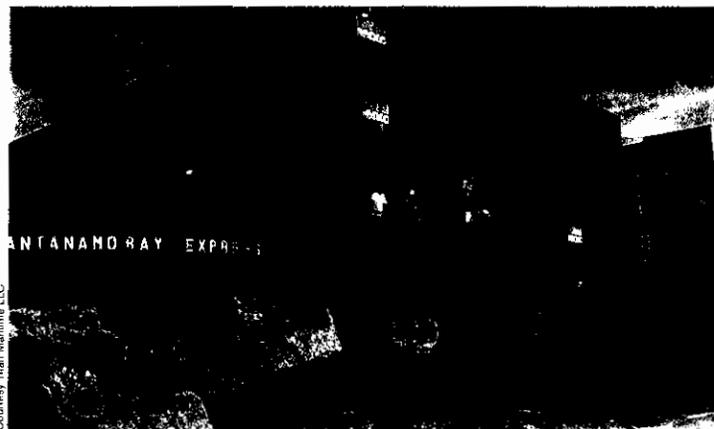
lantic to undertake the salvage operation.

Titan mobilized two contract tugs from Smith Maritime in Green Cove Springs, Fla. Titan deployed crews and equipment from its Fort Lauderdale headquarters.

Once on the scene, Titan determined the grounding had breached six void spaces on the barge's port side, according to Titan salvage master Wes Woessner.

The salvors blew compressed air into the void spaces to refloat the vessel so the tugs could move it to safety. The barge was refloated on the tide at 1830 on Nov. 12, and towed to safety. At about 0230 the barge was moored at the Blount Island Marine Terminal, where it was unloaded in three hours before being towed to Atlantic Dry Dock for repairs.

"From mobilization to breakdown,



Courtesy: Titan Maritime LLC

Winds were in excess of 30 knots when the barge broke loose from its tug. Salvors refloated the barge by blowing air into its void spaces.

the entire operation took four days, but the barge was off the rocks in hours," Woessner said.

The accident did not result in any injuries. Woessner said the tow wire broke about 3 inches behind the Spelter socket, a fitting connecting the towing wire to the bridle.

Cook described the cause of the accident as "pretty simple; the wire broke."

John Snyder

New York sightseeing boat hits unknown object in Harlem River

The Circle Line Sightseeing Cruises' *Sightseer XII* struck an unknown object at about 1715 on Oct. 31 while in the Harlem River, near the Third Avenue Bridge, penetrating the hull in the rudder compartment.

The 165-foot-long vessel was on a cruise around Manhattan, which began at 1530 from Pier 83, Circle Line's headquarters on the Hudson River near midtown Manhattan.

After striking the object, the captain of the vessel, which was carrying 135 passengers, contacted the U.S. Coast Guard and proceeded to the Yankee Stadium Ferry Landing, according to Petty Officer 2nd Class

Mike Hvozda, a Coast Guard spokesman.

"They knew that they struck something, so in order to be on the safe side, he pulled over to the nearest dock," said Andres Sappok, Circle Line's general manager. "They realized the boat was taking on some water, but she was never any danger to anybody."

The passengers were evacuated in about 10 minutes, and there were no injuries.

Officials have not determined what the object was, according to Hvozda. It knocked a hole in the rudder compartment, measuring about 6 to 8 inches long and 4 inches wide. "They were never in any danger of sinking because

the compartment was small and the watertight integrity of that compartment wasn't broken," Hvozda said.

The vessel took on about 6 to 8 feet of water in the compartment. The vessel was to be towed to a shipyard on Staten Island to survey the damage.

Sappok said the company could not give an estimate of the damage to the ferry. In the 11 years he's been with the company, Sappok said, this is the first time one of the Circle Line vessels has been damaged by an unknown object. "There's a lot of driftwood and stuff, but that obviously doesn't cause this kind of damage," he said.

David Tyler

Tug and barge topple aid to navigation in the Detroit River

The entire tower of a 42-foot-high Canadian light station on the Detroit River was destroyed early in the morning on Sept. 11 by *Barge A-397* which was being pushed by the 3,600-hp tug *Karen Andrie*.

The tug was heading upriver, along the Canadian side of the border, pushing the 270-foot-long *Barge A-397*, which was carrying ballast, according to Matthew P. Stump, environmental and safety director for Andrie Inc., of Muskegon, Mich., which owns the vessels. The barge struck Bar Point Light D33 at about 0600, according to Stump. There were no injuries and no environmental damage, he said.

The light station consisted of a four-story concrete pedestal with a square concrete building topped by a tower. The light was about 46 feet above the water at Hackett's Reach in the Detroit River. After the incident, all that remained of the light station was the pedestal. The light was built in 1962.

The tower was demolished," said Wendy Bonvie, supervisor of field services for the Canadian Coast Guard Base Amherstburg. "It was a substantial structure; it was quite a rock."

A temporary, flashing yellow light was set up on the pedestal. A diver was sent out to investigate the integrity of the base below the waterline, Bonvie said.

There was no damage to *Karen Andrie*; the barge sustained damage, but Stump would provide no details.

The U.S. Coast Guard allowed the tug and barge to go to Toledo, Ohio, for repairs, according to Gail Crossman, a spokeswoman for Transport Canada. The master of the tug is cooperating with Transport Canada's request for information,

Crossman said, but could not provide any other details of the investigation. The Transportation Safety Board of Canada is also investigating the incident, according to Jean Cotreau, spokesman for that agency.

David Tyler

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Undetected heart ailment led to fatal I-40 bridge accident, NTSB rules

An abnormal heart rhythm that could not be detected in a physical exam was probably the reason the captain of the towboat *Robert Y. Love* fainted just before his tug and tow went off course and struck a highway bridge, according to the National Transportation Safety Board.

The accident on May 26, 2002, resulted in the deaths of 14 people.

The towboat was pushing two

empty barges when the captain lost consciousness. The lead barge then struck a pier on the Interstate 40 bridge over the McClellan-Kerr Arkansas River Navigation System. The impact knocked down a 503-foot-long section of the bridge, and eight cars and three semitrailer trucks hurtled off the bridge and into the water.

The NTSB, which issued its accident report on Aug. 31, 2004, made several recommendations. One of them calls for the U.S. Coast Guard to evaluate the effectiveness of wheelhouse alerter systems on inland towing vessels. These devices would be designed to set off an alarm when an operator ceases to be in control of a vessel.

Marine Transport Co., of Vicksburg, Miss., which owns *Robert Y. Love*.

Other recommendations include asking the Federal Highway Administration to revise its system for rating bridges in need of replacement or repair to take into consideration the risk of impact by a vessel. The NTSB has also suggested that the FAA develop a system to warn motorists so they can stop in case a bridge does collapse.

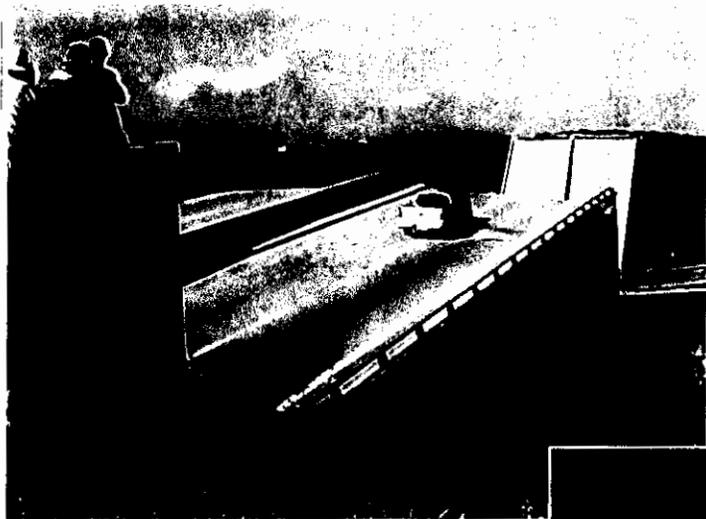
On the day of the *Robert Y. Love* accident, the captain of *Love* suddenly lost consciousness at about 0745, while piloting the towboat and two barges upriver. The lead barge struck a pier in the I-40 bridge, about 200 feet west of the navigation channel. At 0700, the on-duty deck hand had talked with the captain for about 30 minutes. He later told investigators the captain did not seem sick or seem to have anything wrong with him.

The captain said the last thing he remembered before the accident was aligning the tow to go under the bridge and passing a green navigation buoy to port, about a third of a mile from the bridge, according to the report.

The captain told investigators, "I remember looking out to the side of the buoy and then looking back at the bridge, and after that I don't remember (anything)," according to the report.

Because the tow was traveling at about 6.7 miles per hour; the transit time from the navigation buoy to the bridge was estimated to be about four minutes. The NTSB estimates that this is about how long the captain was unconscious.

That time span is significant, because it suggests that if the boat had



Above, eight cars and three trucks drove off the I-40 bridge after the span collapsed. Right, the bridge piers on either side of the navigation channel had fenders to protect them, but the tug and barge ended up hitting an unprotected pier. Below, chart shows route the vessels took before hitting the bridge.

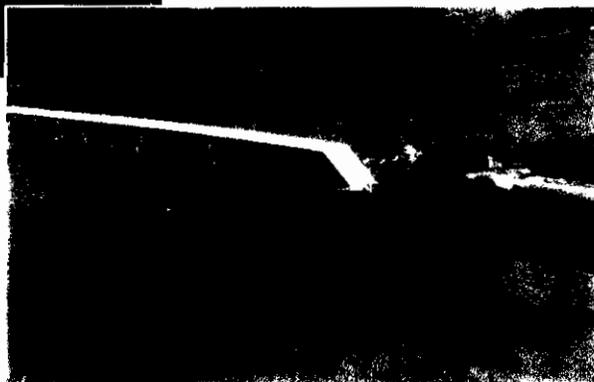
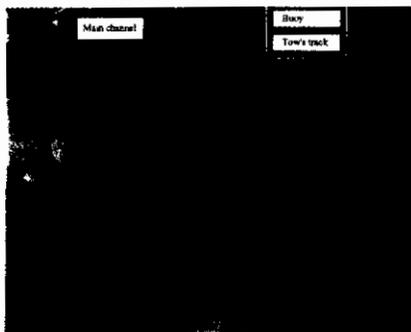


Photo by AP/Wide World, (bottom) AP/Wide World



Three U.S. towing companies are already using wheelhouse alerter systems, according to Ellen Engleman Connors, the NTSB's chairman: the American River Transportation Co. (Artco), of Decatur, Ill.; Kirby Inland Marine, of Houston; and Magnolia

been equipped with an alerter system, there would have been enough time for some other member of the crew to respond to an alarm and take control before the tow hit the bridge.

The captain, who was put on disability after the accident, had held an uninspected vessel operator's license for almost 30 years. He told the NTSB he had passed under the I-40 span "hundreds of times."

At the time of the accident, the weather was mild and river conditions were calm. The barge tow was small, the

barges were empty, and there were no external conditions, such as high wind or rain, that would have affected the captain's ability to control the tow, according to the NTSB report. Excessive maneuvering was not required to pass through the navigation channel under the bridge, which was 296 feet wide.

The captain, who was 60 at the time of the accident, tested negative for alcohol and drugs. He was working a six-on/six-off shift. In the 72 hours before the May 26 incident, the captain experienced "significant disrup-

tion to his work-related sleep patterns," according to the NTSB report. On May 24, he cut his normal six hours of afternoon sleep by three hours. He stayed awake all night May 24 and all morning May 25. On the morning of May 25, he slept for four hours when he would normally be awake. He also drove for 10 hours to meet *Robert Y. Love*, missing his afternoon sleep period. In that 72-hour period, the captain had a sleep deficit of 10 to 11.5 hours, according to the NTSB.

Despite that deficit, the NTSB concluded that his loss of consciousness was probably not due to falling asleep. According to investigators, the captain described losing consciousness "all at once," which is not typical of falling asleep.

The captain also said he had taken Benadryl for a sinus headache between 2315 and 2330 just before going to sleep the night before the accident. Benadryl, a trade name for diphenhydramine, is an over-the-counter antihistamine often used to treat allergies. In over-the-counter doses, the medication commonly results in drowsiness and has measurable effects on doing complex motor tasks, according to the report.

Although his performance may have been subtly impaired by the low level of diphenhydramine in his blood and it may have made him more prone to falling asleep, the NTSB does not think the drug contributed to his incapacitation.

The captain's most recent Coast Guard-required physical was on Nov. 3, 1997, and showed no medication use or medical problems. At that physical, the captain said he did not have a history of heart or vascular disease, dizziness or fainting. After the accident, the captain did state that he suffered

Golf course conversation led to invention of alerter

The rudder-monitoring alerter system being used by the American River Transportation Co. (Artco) and Magnolia Marine was invented and is being sold by Wood River Electronics Inc. in Illinois.

Steve Dowdy, company president, said his system is tied to the vessel's steering linkage. "You don't have to change course or anything; just wiggle the linkage," Dowdy said.

Dowdy came up with his alerter in the wake of the *Robert Y. Love* incident. While playing golf with a friend who works at Artco, Dowdy said someone should do something. His friend replied, "You're in the electronics business. You do something."

In about six weeks, Dowdy said he came up with a prototype that was installed in September 2002 on an Artco vessel. "It seemed to work fine, and the captains didn't have a problem with it," Dowdy said.

Dowdy's system has two separate alarms. One alarm, consisting of a buzzing noise and a flashing LED light, can be programmed to go off if the operator doesn't touch the steering mechanism for between 1 minute 15

seconds and 2 minutes. If the operator does not respond in 20 seconds, a second alarm goes off in five other locations in the vessel, including the captain's cabin, the galley and the crew lounge. This system is independent of the ship's general alarm. The alarm keeps sounding until a crewmember comes up to the wheelhouse, Dowdy said.

His system, which costs about \$1,800 to install, is now on more than 150 vessels, Dowdy said. Companies that use it include Marquette Transportations Co., of Paducah, Ky.; Memco Barge Line, of Chesterfield, Mo.; and American Commercial Barge Line LLC, of Jeffersonville, Ind.

Magnolia installed Dowdy's alarm on all 16 of its vessels. The company likes it because "it has less moving parts and is based on proven technology," said Lester Cruse, port captain for Magnolia Marine. "It's a good system. It's very cost effective."

Capt. James Scheffer, chief of the Major Investigations Division for the National Transportation Safety Board, said of the alerters, "The board thinks this is a promising safety improvement. The indications from Magnolia and American River (are) that they are working fine, and I would say the majority of the crew (likes) it."

David Tyler

some dizzy spells at home, which he thought were caused by overexertion.

He told investigators he felt dizzy and sick on May 22 while on the towboat *Jennie Dehmer* and that he lay down and felt fine for his next watch.

Extensive testing after the accident did not find a cause for the captain's loss of consciousness. A stress test after the accident found that the captain's heart was normal. After an invasive procedure, it was discovered that the captain had coronary artery disease. His doctors then recommended a test that attempts to create an abnormal rhythm in the heart. After that test, the captain had a device implanted that shocks the heart if it goes into an abnormal rhythm.

Given that the captain apparently fainted because of an undiagnosed medical condition, the NTSB concluded that a wheelhouse alerter might have prevented this accident.

"If the *Robert Y. Love* had been equipped with such a system on the day of the accident, other crewmembers onboard the vessel may have been alerted to a problem in the wheelhouse and may have been able to prevent the accident," NTSB Chairman Conners wrote in a Sept. 9, 2004, memo to Adm. Thomas H. Collins, commandant of the Coast Guard. "Therefore, the Safety Board concludes that the presence of either another crewmember in the wheelhouse or a wheelhouse alerter system might have resulted in timely action that could have prevented this accident."

Kirby Inland Marine is using a system to detect physical movement in the wheelhouse, according to Capt. James Scheffer, chief of the Major Investigations Division for the NTSB. If there is no motion in the wheelhouse, the system sounds an alarm to

alert the crew. This detection system ignores movement close to the deck, so the alarm will still be sounded if a person falls to the deck and thrashes around.

Artco and Magnolia Marine are using a rudder-monitoring system, in

which an alarm sounds if the operator does not attend the helm (see sidebar). Artco put the steering-based system into all 30 of its long-haul towboats and 30 tug or harbor boats, according to the NTSB.

David Tyler

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New Alaska high-speed ferry strikes mooring dolphin when departing Skagway

The Alaska Marine Highway System ferry *Fairweather* rubbed against the mooring lines of a nearby cruise ship and struck a mooring dolphin while departing Skagway, Alaska, on Sept. 21.

As a result of the impact with the dolphin, *Fairweather* suffered a crack in the seam of its aluminum plating at the port bow gunwale about 15 feet above the waterline. The 238-foot high-speed ferry did not actually hit the cruise ship, Holland-America's *Zaandam*, but the mooring lines were "chafed significantly," according to

Lt. j.g. Daniel G. Bushbaum, of the U.S. Coast Guard Marine Safety Office Juneau.

The damage did not affect operations, and there were no injuries on either vessel.

The \$40 million *Fairweather* was delivered to the AMHS in March 2004. On the delivery trip from the shipyard in Connecticut to Alaska, *Fairweather* lost one of its four MTU engines because of improperly installed exhaust manifold parts. Since then the ferry has been operating on three engines until a replace-



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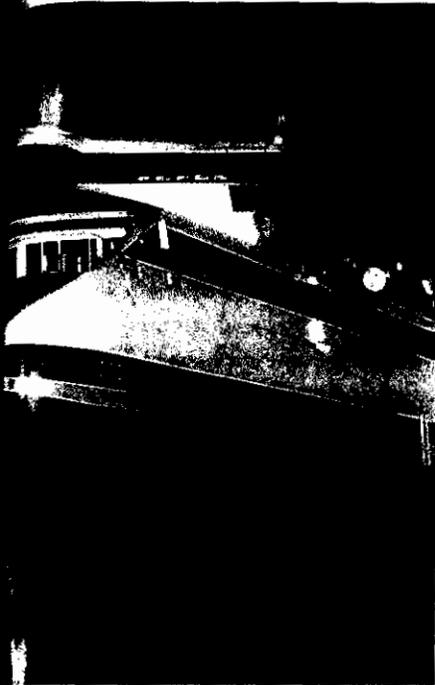
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Off the Antarctic coast, November 1999: three boats re-enacting the Shackleton expedition of 1914-16 and a DIB 28' River Freighter outfitted as an IMAX camera platform for filming "The Endurance." Photo courtesy of Vineyard Productions.

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ment can be installed during scheduled maintenance in October.

With only three of its four engines working, *Fairweather* has been prohibited from operating in currents over 3.5 knots and winds over 25 knots. According to Nona Wilson, spokeswoman for AMHS, it is unclear whether the reduced power was a factor in the recent accident. Strong winds and the vessel's high freeboard may have been contributing factors, she said. Normally *Fairweath-*

Fairweather was delivered to the Alaska Marine Highway System in March 2004. Since going into service, the ferry has been operating on just three engines. The fourth has been inoperative because of problems with the exhaust manifold.

er only uses two engines when mooring or leaving the dock.

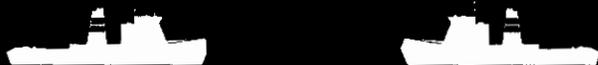
Inspectors from AMHS and the Coast Guard inspected the vessel following the incident. Temporary repairs were made to the damaged hull plating in Juneau, and the ferry returned to limited service on Sept. 23.

The incident is still under investigation by AMHS and MSO Juneau.

At the time of the incident the weather conditions were clear, but winds were estimated to be about 25 knots, gusting to 30 knots.

"At the time of the allision, no engines were reportedly engaged," Bushbaum said.

John Snyder



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maritime casualties

Tanker damages Mississippi ferry landing after losing steerage near New Orleans

The 813-foot Greek-flagged tanker *Astro Altair* lost steering and struck the state-owned Algiers ferry landing near New Orleans on Aug. 30, 2004. The ship damaged the ferry landing ramp and pontoons, rendering the ramp and the landing unusable.

The double-hulled tanker laden with crude oil was northbound in the Mississippi River when the accident occurred at about 1430. According to Lt. Cmdr. Cheri Ben-Iesau of U.S. Coast Guard Marine Safety Office New Orleans, the tanker was one mile below Algiers Point (Mile 95)

were immediately on scene to assist the tanker. The landing is used by ferries that operate between New Orleans and Algiers Point. At the time of the accident the ferry was on the New Orleans side of the river.

Damage to the tanker was limited to a gash in its port bow about 30 feet above the waterline. The Coast Guard and maritime surveyors inspected the ship on site to be sure there was no risk of pollution before the tanker was towed to the Ama Anchorage at mile 115-117.

Astro Altair was then towed to the Grandview Anchorage above the



Astro Altair sustained damage to its bow when it hit a ferry landing and pontoons. The ship was trying to round Algiers Point when it lost control of its rudder.

and preparing to round at half speed. As *Astro Altair* approached the point, the pilot ordered the rudder to port, but the steering did not respond. The captain sounded the alarm. The pilot then ordered full speed and the rudder to starboard to avoid hitting the Algiers Point ferry ramp and its pontoon landing, which extend out into the river. This bend in the river approaches 90° and is one of the sharpest in the river, Ben-Iesau said.

The tanker also released eight to nine lengths of anchor chain in an effort to stop or slow the vessel. Tugs

Gramercy Bridge, where it underwent further inspection before being moved to the St. James Sugar Dock, a petroleum unloading facility at mile 157.7.

Ben-Iesau said that at the time of the collision, the tanker had aboard a pilot belonging to the New Orleans-Baton Rouge Steamship Pilots Association. She said the cause of the steering loss and subsequent collision were still under investigation and that no pollution or injuries were associated with the incident.

John Snyder

Containership runs aground in St. Lawrence River

The 604-foot Maltese-flag container-ship *Horizon* grounded in an 800-foot-wide section of the St. Lawrence River near Tracy, Quebec, about 100 miles northeast of Montreal. The incident occurred on July 24, 2004, at about 1500 in good weather on a straight section of the river.

The vessel, which had a pilot onboard, strayed outside of the channel and grounded in the mud, according to Pierre Ledrun, a spokesman for Transport Canada in Montreal. So far inspections have not revealed any breaches of the hull or any other significant damage to the ship, Ledrun said. Salvage plans call for unloading the containerized cargo to barges and transporting them ashore. Salvors will then refloat the ship with the aid of tugs.

John McPeak, assistant traffic manager for Zim Israel Navigation Co., which charters the ship from its owner Tsakos Shipping & Trading, said the fully loaded vessel left Montreal and was outbound for Hamburg, Germany. McPeak said that once all the cargo was unloaded, it would be transported to nearby Sorel, Quebec.

Horizon was refloated on Aug. 4, 2004, at 1700. If *Horizon* is deemed seaworthy after inspection, it will be reloaded in Sorel and continue on its voyage. McPeak cautioned that even if no damage occurred as a result of the grounding, towing the ship out of the mud could cause structural problems. "We'll just have to wait and see," he said.

McPeak said the unloading would take a long time because all of the filled

containers were below and many empty containers had to be unloaded first.

Martin Blouin of the Canadian Coast Guard's public affairs office in Montreal said the cause of the grounding is under investigation. He said the incident has not caused any pollution and that there were no injuries.

John Snyder

Car carrier strikes fender of bridge in San Francisco Bay

An inbound car carrier, the 650-foot *Pacific Highway*, struck a concrete fender on the Richmond-San Rafael Bridge in San Francisco Bay on July 11. The accident occurred at about 1630 in good weather with a pilot onboard. *Pacific Highway*, registered in Panama, was bound for Benicia, Calif.

According to investigating officer Lt. Christopher Hochschild of the U.S. Coast Guard Marine Safety Office San Francisco, *Pacific Highway's* hull was breached amidships on the port side. The impact with the bridge fender resulted in a small gash 3 inches long and 2 inches wide about 3 feet above the waterline. Temporary repairs were made in Benicia, and permanent repairs were to be done when the ship returned to a shipyard in Asia. Damage to the bridge, which was not closed to vehicular traffic, is still being assessed.

At the time of the accident, the surrounding area had a fair number of recreational craft. Hochschild said he could not comment on whether any other vessel was involved in the accident.

John Snyder

HUMBOLDT STATE UNIVERSITY



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Human Resources

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TIDEWATER COMMUNITY COLLEGE

Circle No. 64 on the reader service card.

Timothy W. Fulham
15 Windsor Road
Wellesley, MA 02481

004114

February 22, 2005

Karen Kirk-Adams
Cape Wind Energy EIS Project
U.S. Army Corps of Engineers, New England District
696 Virginia Road
Concord, MA 01742

RE: Comments on the Cape Wind DEIS

I am writing as a citizen of the Commonwealth of Massachusetts.

In summary, I think the costs of erecting this wind farm exceed by a wide margin the benefits proposed.

I wish to emphasize the following reasons for why I am opposed to the project:

Flawed process for reviewing Cape Wind's Proposal. This proposal should be delayed until comprehensive rules can be developed for installing wind turbines in federal waters, just as there are for oil, gas, and other natural resources. In addition, I understand that Army Corps cannot grant property rights and the Corps typically regulates obstructions to navigation, not power plants.

Land give-away. Cape Wind would occupy 24 square miles of public lands for free. I believe this is an imposition on taxpayers.

Sanctuary status violated. I understand state waters are an ocean sanctuary that prohibits electricity generation. The Sound has been nominated twice for federally protected status and should be protected as a marine sanctuary.

Boating dangers. I believe the project would crowd main navigation channels for cargo ships, ferries, and fishing boats. The risk of collisions with the turbine towers would increase especially during fogs and storms, for which the area is known. The Steamship Authority and Hy-Line Cruises, which together transport over three million passengers to and from the Islands every year, oppose the project because of its safety threat.

Aviation danger. Over 1,000 flights a day during the summer transect the Sound at heights as low as 500 feet. Local air traffic controllers oppose the project because they view it as "an accident waiting to happen", and local airports are concerned due to turbine height.

004114
FEB 23 2005
CONCORD MA

Commercial fishing impacts. Hundreds of fishermen work Horseshoe Shoal and make half their annual income from the catch. Risk of turbines collision or gear catching in the spider web of cables between the towers will largely preclude fishing in the area. Placing 130 turbines and miles of cabling in the sea bed will cause elevated turbidity, which will smother bottom-dwelling organisms, kill juvenile fish, and drive off adults. Nantucket Sound fishery will suffer.

Bird kill. The Sound is densely populated by birds onshore. Offshore wind energy experience suggests bird kill could range from 1898-6643 deaths per year. Cape Wind estimates only 364.

Excessive subsidies. The public would be paying Cape Wind to build the wind plant. Cape Wind would occupy public land for free and gain millions of dollars per year in subsidies. An economic study by The Beacon Hill Institute estimates Cape Wind would receive a subsidy of \$241 million from state and federal sources.

High cost. Offshore wind costs twice as much as gas fired electricity and significantly more than onshore wind. To survive financially, this project would need continued government subsidies through out the life of the project.

Risky technology. Cape Wind is the first offshore wind plant in US. Offshore wind is immature; only 2% of wind power in the world is offshore. Denmark's flagship offshore project recently experienced significant technical failures. All 80 turbines in the two-year-old facility had to be dismantled, and brought ashore for costly repairs. 3.6 MW proposed technology is not commercial; the only installation is a 7 turbine demonstration project in Ireland.

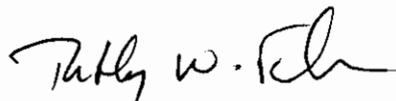
Backup generation costs. Wind is intermittent and requires backup. What is need for backup power, and who pays? What are the true benefits, given the need for backup?

Alternatives exist. Alternatives to achieve the same benefits for lower costs need to be evaluated prior to permit decision. Review land based wind, energy conservation, and plant upgrades – scenarios that don't compromise the Sound.

Deeper water locations. Why can't the project be further offshore? Some European countries are requiring minimum 12 miles offshore. Moray Firth in Scotland is being built in water depths of 130 feet and more than 12 miles offshore.

Decommissioning. Provisions for repairs and dismantlement must be made. How much will Cape Wind need to guarantee and post up front?

With thanks for considering my objections to this project,



Timothy W. Fulham

Comment Sheet
On Draft Environmental Impact Statement (EIS)
For the proposal for an Offshore Wind Project
In Nantucket Sound

004115

Name: SHIRLEY A. FISHERAddress: 115 Old Stage Rd
CENTERVILLE MA
02632Phone Number (Please include area code): 508 775 1637Email Address: HERONMAN@AOL.COM

Please state your questions/comments in the space below:

Since the Cape Wind project was initiated, I have made every effort to keep an open mind and to become an educated layperson. I have read summaries of the DEIS/DEIR report, attended three public meetings, and discussed the issues with numerous friends here on Cape Cod. I have tried to balance the global warming, dependence on fossil fuels, and clean air arguments (among others) vs. impacts on the environment, unregulated public "ocean land", and beauty of Nantucket Sound arguments, to name a few.

After listening to the various view points and attempting to digest the "scientific" data, I conclude that this is the wrong project for the wrong reason, the wrong size, the wrong location and the wrong time. It is seriously flawed with inaccurate and nonlongitudinal data. Economic data on energy savings is not conclusive. There is no indication of compromise or mitigation or analysis of alternative locations on the part of Cape Wind developers. I am in full agreement with the Cape Cod Commission's conclusion asking for at least, a supplemental DEIS/DEIR.

Please fold this questionnaire in half, affix two stickers or pieces of tape, and mail it to the address listed on the other side.

Ask this fundamental question: do the probable BENEFITS AS PROPOSED BY CAPE WIND OUTWEIGH THE POTENTIAL RISKS? THE ANSWER IS NO. This project should NOT be permitted.

Telecom

004116

Hello Karen,

My name is Jerome Melaventi, at 375 School Street, in Watertown, Massachusetts, and my phone number is 617-924-6036. No need to call me back, just want to give you, I don't know if I will be able to get to an email to email. I just want to give you a heads up or a comment about the capewind project. I know today is the deadline, so I know you are very busy, I'm sure.

I am fully fully in support of it, So I just want to go on record saying so. Ah... so for, I think it is so crucial. There's so much information ah... that is leading us forward, we need to do this, ah... we need to be a leader.

Ah... Denmark has already don this, they have actually been a great success, tourism, industry, and fishing degree has increased buying, ah... and there is another one for plans and there are only good things and we really really need to get on board with renewable energy resources and this is a great way to do it. And it could be the um... ah... forteller of things to come, and it could fate a wonderful great industry for the Boston area, Quincy shipyard, for all over.

But if we can start here and have them also numbers around the country, I think it is wonderful and I would love, certainly love to have one in my backyard. And I am a frequent visitor/vacationer to the cape, Falmouth, ah... Martha's Vineyard um...and I would love to see a windmill off in the horizon, even though they will hardly be visible at all, most times. But I don't see it as an eyesore at all, I think it will increase tourism, businessstry in the fishing, recreation industry. They will want to go out and check them out.

Um... and a ah.... There is such an ah... so many, so many reasons for it. The only reason I can see not for it is just the peoples fear or or unawareness of the benefits and if 75% of the cases needs, please, please, please approve it.

Thank you so much Ba-Bye

Good luck with the process, I know you are so busy, but ah. Congratulations to you all over there for doing such a good job and reviewing everything.

Thank you very much, Ba-Bye

Adams, Karen K NAE

From: RdMcCrary@pstcc.edu
Sent: Thursday, February 24, 2005 4:52 PM
To: Energy, Wind NAE
Subject: Ensure 'Cape Wind' Project Is Safe for Wildlife

004117

Colonel Thomas Koning
U.S. Army Corps of Engineers
696 Virginia Road
Concord, MA 01742-2751

Dear Colonel Koning,

Before you approve or deny a permit to erect 130 turbines in Nantucket Sound, please require the developer to conduct the thorough studies recommended by the U.S. Fish and Wildlife Service and the Massachusetts Division of Fisheries and Wildlife.

Specifically, the environmental review of this project should include:

- Three full years of visual observations of birds
- 12 months of radar observations of flying wildlife
- A thorough and timely review of the project's potential effect on wildlife, including marine mammals

These factors will help determine whether the Cape Wind project is in the best interests of both the public and wildlife.

As it is written, the U.S. Army Corps of Engineers' draft environmental impact statement is hopelessly flawed, because it ignores relevant information and draws conclusions based on inadequate research.

This project could be the first marine wind energy facility in the United States. As such, it will set a precedent for other offshore renewable energy projects.

Please require a rigorous, scientific review of its environmental effects. Clean air and healthy wildlife populations are not mutually exclusive. We need both.

Sincerely,

Richard McCrary
401 S Gallaher View Rd
#234
Knoxville, Tennessee 37919

Adams, Karen K NAE

From: drag0nfli_2000@yahoo.com
Sent: Thursday, February 24, 2005 5:22 PM
To: Energy, Wind NAE
Subject: Ensure 'Cape Wind' Project Is Safe for Wildlife

004113

Colonel Thomas Koning
U.S. Army Corps of Engineers
696 Virginia Road
Concord, MA 01742-2751

Dear Colonel Koning,

Before you approve or deny a permit to erect 130 turbines in Nantucket Sound, please require the developer to conduct the thorough studies recommended by the U.S. Fish and Wildlife Service and the Massachusetts Division of Fisheries and Wildlife.

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Sincerely,

Tabitha Wilkes
10533 Evangeline way
Dallas, Texas 75218

Adams, Karen K NAE

From: midnight@aol.com
Sent: Thursday, February 24, 2005 6:13 PM
To: Energy, Wind NAE
Subject: Ensure 'Cape Wind' Project Is Safe for Wildlife

004113

Colonel Thomas Koning
U.S. Army Corps of Engineers
696 Virginia Road
Concord, MA 01742-2751

Dear Colonel Koning,

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Sincerely,

Katherine Mittnight
462 Second Ave
Troy, New York 12182-

Adams, Karen K NAE

From: noelgmg@aol.com
Sent: Thursday, February 24, 2005 7:21 PM
To: Energy, Wind NAE
Subject: Ensure 'Cape Wind' Project Is Safe for Wildlife

004120

Colonel Thomas Koning
U.S. Army Corps of Engineers
696 Virginia Road
Concord, MA 01742-2751

Dear Colonel Koning,

Before you approve or deny a permit to erect 130 turbines in Nantucket Sound, please require the developer to conduct the thorough studies recommended by the U.S. Fish and Wildlife Service and the Massachusetts Division of Fisheries and Wildlife.

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Sincerely,

Grace Gonzalez
700 Delphi Drive
Lafayette, Colorado 80026

Adams, Karen K NAE

From: mercyoflove@comcast.net
Sent: Thursday, February 24, 2005 9:09 PM
To: Energy, Wind NAE
Subject: Ensure 'Cape Wind' Project Is Safe for Wildlife

004121

Colonel Thomas Koning
U.S. Army Corps of Engineers
696 Virginia Road
Concord, MA 01742-2751

Dear Colonel Koning,

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Please require a rigorous, scientific review of its environmental effects. Clean air and healthy wildlife populations are not mutually exclusive. We need both. Thank you for taking time to read my mail.

Sincerely,

LaDonna Wernersbach
110 S. Crestwood Blvd.
DeSoto, Texas 75115

Adams, Karen K NAE

From: annbliz@sbcglobal.net
Sent: Friday, February 25, 2005 3:30 AM
To: Energy, Wind NAE
Subject: Ensure 'Cape Wind' Project Is Safe for Wildlife

Colonel Thomas Koning
U.S. Army Corps of Engineers
696 Virginia Road
Concord, MA 01742-2751

004122

Dear Colonel Koning,

Before you approve or deny a permit to erect 130 turbines in Nantucket Sound, please require the developer to conduct the thorough studies recommended by the U.S. Fish and Wildlife Service and the Massachusetts Division of Fisheries and Wildlife.

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Please require a rigorous, scientific review of its environmental effects. Clean air and healthy wildlife populations are not mutually exclusive. We need both.

Sincerely,

ANN BROWN
1550 IRON POINT RD
SUITE 323
FOLSOM, California 95630

Adams, Karen K NAE

From: atchisoj@hoffman.army.mil
Sent: Friday, February 25, 2005 6:58 AM
To: Energy, Wind NAE
Subject: Ensure 'Cape Wind' Project Is Safe for Wildlife

Colonel Thomas Koning
U.S. Army Corps of Engineers
696 Virginia Road
Concord, MA 01742-2751

004123

Dear Colonel Koning,

Before you approve or deny a permit to erect 130 turbines in Nantucket Sound, please require the developer to conduct the thorough studies recommended by the U.S. Fish and Wildlife Service and the Massachusetts Division of Fisheries and Wildlife.

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Sincerely,

Jacque Atchison
14327 Rehfield Court
Dale City, Virginia 22193

Adams, Karen K NAE

From: bkind2animals@comcast.net
Sent: Friday, February 25, 2005 11:36 AM
To: Energy, Wind NAE
Subject: Ensure 'Cape Wind' Project Is Safe for Wildlife

Colonel Thomas Koning
U.S. Army Corps of Engineers
696 Virginia Road
Concord, MA 01742-2751

004124

Dear Colonel Koning,

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Sincerely,

Alfredo KUBA
500 W. Middlefield Rd.
Mountain View, California 94043

Adams, Karen K NAE

From: silentbob20@yahoo.com
Sent: Friday, February 25, 2005 2:08 PM
To: Energy, Wind NAE
Subject: Ensure 'Cape Wind' Project Is Safe for Wildlife

004125

Colonel Thomas Koning
U.S. Army Corps of Engineers
696 Virginia Road
Concord, MA 01742-2751

Dear Colonel Koning,

Before you approve or deny a permit to erect 130 turbines in Nantucket Sound, please require the developer to conduct the thorough studies recommended by the U.S. Fish and Wildlife Service and the Massachusetts Division of Fisheries and Wildlife.

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Sincerely,

Molly McCormick
995 South Glenhurst
Birmingham, Michigan 48009

Adams, Karen K NAE

From: cats1234@juno.com
Sent: Friday, February 25, 2005 5:27 PM
To: Energy, Wind NAE
Subject: Ensure 'Cape Wind' Project Is Safe for Wildlife

Colonel Thomas Koning
U.S. Army Corps of Engineers
696 Virginia Road
Concord, MA 01742-2751

004126

Dear Colonel Koning,

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Please require a rigorous, scientific review of its environmental effects. Clean air and healthy wildlife populations are not mutually exclusive. We need both.

Sincerely,

Janet Shoemaker
155 Sam Hill Rd
Guilford, Connecticut 06437

Adams, Karen K NAE

From: dori_roy@sbcglobal.net
Sent: Friday, February 25, 2005 6:52 PM
To: Energy, Wind NAE
Subject: Ensure 'Cape Wind' Project Is Safe for Wildlife

Colonel Thomas Koning
U.S. Army Corps of Engineers
696 Virginia Road
Concord, MA 01742-2751

004127

Dear Colonel Koning,

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Please require a rigorous, scientific review of its environmental effects. Clean air and healthy wildlife populations are not mutually exclusive. We need both.

Sincerely,

Dori Legard
13243 Armaga Springs Rd
Austin, Texas 78727

Adams, Karen K NAE

From: jfsea@msn.com
Sent: Friday, February 25, 2005 7:04 PM
To: Energy, Wind NAE
Subject: Ensure 'Cape Wind' Project Is Safe for Wildlife

Colonel Thomas Koning
U.S. Army Corps of Engineers
696 Virginia Road
Concord, MA 01742-2751

004128

Dear Colonel Koning,

Before you approve or deny a permit to erect 130 turbines in Nantucket Sound, please require the developer to conduct the thorough studies recommended by the U.S. Fish and Wildlife Service and the Massachusetts Division of Fisheries and Wildlife.

Specifically, the environmental review of this project should include:

- Three full years of visual observations of birds
- 12 months of radar observations of flying wildlife
- A thorough and timely review of the project's potential effect on wildlife, including marine mammals

These factors will help determine whether the Cape Wind project is in the best interests of both the public and wildlife.

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Sincerely,

Janette Freer
47 Howard Hill Rd.
#201
Jaffrey, New Hampshire 03452

Adams, Karen K NAE

From: tonysladek@hotmail.com
Sent: Saturday, February 26, 2005 10:48 PM
To: Energy, Wind NAE
Subject: Ensure 'Cape Wind' Project Is Safe for Wildlife

Colonel Thomas Koning
U.S. Army Corps of Engineers
696 Virginia Road
Concord, MA 01742-2751

004129

Dear Colonel Koning,

Before you approve or deny a permit to erect 130 turbines in Nantucket Sound, please require the developer to conduct the thorough studies recommended by the U.S. Fish and Wildlife Service and the Massachusetts Division of Fisheries and Wildlife.

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Sincerely,

tony sladek
1202N 75th St - #154
downers grove, Illinois 60516

Adams, Karen K NAE

From: luckysquirrel420@hotmail.com
Sent: Sunday, February 27, 2005 1:06 AM
To: Energy, Wind NAE
Subject: Ensure 'Cape Wind' Project Is Safe for Wildlife

Colonel Thomas Koning
U.S. Army Corps of Engineers
696 Virginia Road
Concord, MA 01742-2751

Dear Colonel Koning,

Before you approve or deny a permit to erect 130 turbines in Nantucket Sound, please require the developer to conduct the thorough studies recommended by the U.S. Fish and Wildlife Service and the Massachusetts Division of Fisheries and Wildlife.

004130

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Sincerely,

Maggie Lakota-Ryan
580 Saratoga Drive
Chicago Heights, Illinois 604111915

Adams, Karen K NAE

From: blackcat@ecoisp.com
Sent: Sunday, February 27, 2005 6:08 PM
To: Energy, Wind NAE
Subject: Ensure 'Cape Wind' Project Is Safe for Wildlife

Colonel Thomas Koning
U.S. Army Corps of Engineers
696 Virginia Road
Concord, MA 01742-2751

004131

Dear Colonel Koning,

Before you approve or deny a permit to erect 130 turbines in Nantucket Sound, please require the developer to conduct the thorough studies recommended by the U.S. Fish and Wildlife Service and the Massachusetts Division of Fisheries and Wildlife.

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Sincerely,

Alecs Sakta
PO Box 17688
Tucson, Arizona 85731-7688

Adams, Karen K NAE

From: marthawdb@aol.com
Sent: Sunday, February 27, 2005 6:49 PM
To: Energy, Wind NAE
Subject: Ensure 'Cape Wind' Project Is Safe for Wildlife

004132

Colonel Thomas Koning
U.S. Army Corps of Engineers
696 Virginia Road
Concord, MA 01742-2751

Dear Colonel Koning,

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Sincerely,

Martha Bushnell
502 Ord Drive
Boulder, Colorado 80303-4732

Adams, Karen K NAE

From: aleciadawn72@yahoo.com
Sent: Sunday, February 27, 2005 8:18 PM
To: Energy, Wind NAE
Subject: Ensure 'Cape Wind' Project Is Safe for Wildlife

004133

Colonel Thomas Koning
U.S. Army Corps of Engineers
696 Virginia Road
Concord, MA 01742-2751

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Please require a rigorous, scientific review of its environmental effects. Clean air and healthy wildlife populations are not mutually exclusive. We need both.

Sincerely,

alecia folsom
4928 boykin dr
north charleston, South Carolina 29420

Adams, Karen K NAE

From: serenity@gate.net
Sent: Monday, February 28, 2005 12:59 AM
To: Energy, Wind NAE
Subject: Ensure 'Cape Wind' Project Is Safe for Wildlife

Colonel Thomas Koning
U.S. Army Corps of Engineers
696 Virginia Road
Concord, MA 01742-2751

Dear Colonel Koning,

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Sincerely,

Anisha Hyers
2035 Sparrow Lane
Blackshear, Georgia 31516

009134

Adams, Karen K NAE

From: ncsuga_grad@yahoo.com
Sent: Monday, February 28, 2005 10:05 AM
To: Energy, Wind NAE
Subject: Ensure 'Cape Wind' Project Is Safe for Wildlife

Colonel Thomas Koning
U.S. Army Corps of Engineers
696 Virginia Road
Concord, MA 01742-2751

004135

Dear Colonel Koning,

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Please require a rigorous, scientific review of its environmental effects. Clean air and healthy wildlife populations are not mutually exclusive. We need both.

Sincerely,

Arlen Clark-Foos
311 Jockey Club Dr
Athens, Georgia 30605

Adams, Karen K NAE

From: Florentine Films/Hott Productions, Inc. [hott@florentinefilms.org]
Sent: Monday, February 28, 2005 1:40 PM
To: Energy, Wind NAE
Subject: Cape Wind

To whom it may concern:

I support the Cape Wind project in Massachusetts. This is the best way to provide safe, clean energy.

Larry Hott

--

004136

SAVE OUR SOUND
alliance to protect nantucket sound

004137

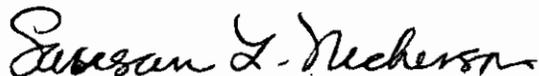
February 24, 2005

**Karen Kirk Adams
Cape Wind Energy EIS Project
U.S. Army Corps of Engineers
New England Division
696 Virginia Road
Concord, MA 01742**

Dear Karen Kirk Adams:

This fax is a hard copy of the Alliance to Protect Nantucket Sound's revised Executive Summary that was received by your office today. Please use this copy.

Thank you,



**Susan L. Nickerson
Executive Director**

Executive Summary – Alliance to Protect Nantucket Sound Comments on Draft EIS for Proposed Cape Wind Associates Energy Plant

CONCLUSIONS

The Cape Wind Associates (CWA) energy plant DEIS is seriously flawed; the review process is legally insufficient; and the proposed project is not in the public interest. The DEIS overstates the benefits of the proposed plant and understates the negative impacts and risks. In addition, the proposed project fails under many state and federal environmental laws. In light of these factors and others, the Corps must deny the Cape Wind application outright. If the Corps intends to continue its review, it must, at the very least, remedy the tremendous holes and glaring deficiencies in the existing review through a supplemental EIS.

The CWA project can never be approved at the federal, state, and local levels. Rather than continuing to pit the mutually compatible environmental goals of ocean conservation and renewable energy against each other, the Corps and CWA need to agree to a consensus-based process that removes Nantucket Sound and similar areas from risk while facilitating and expediting the review and approval of properly-sited renewable energy projects.

BACKGROUND

The Alliance to Protect Nantucket Sound (APNS) has assembled a team of experts to prepare comments on the DEIS. The APNS review of the DEIS is based upon the principles of protecting Nantucket Sound and its multiple public interest values by promoting a national system of ocean governance, establishing a comprehensive regional program for the development of wind energy and other forms of “clean energy,” implementing an effective approach for combating air pollution and greenhouse gas emissions, and securing full cooperation between the Commonwealth and the federal government to protect and manage the ocean areas off the coast of Massachusetts.

THE REVIEW PROCESS IS FLAWED

The DEIS presents a biased discussion of the permit application and promotes the project, rather than analyzing it critically and objectively under federal and state laws, and suffers from serious technical deficiencies and errors.

In addition to the serious flaws in the DEIS, the procedure that the Corps has used to review the proposed wind energy plant is not adequate. The process conflicts with the goals of achieving comprehensive ocean governance and developing a renewable energy program. As supported by the recent decision of the First Circuit Court of Appeals in *Alliance to Protect Nantucket Sound v. U.S. Department of the Army*, there is no legal authority to allow private use of Nantucket Sound for wind energy development. CWA does not have permission from the federal government to use the Outer Continental Shelf (OCS) for its proposed project, and the Corps has no power to give it away. The Corps is required to address this issue as part of its permit application review, and its refusal to do so at this point in time is illegal and a disservice to the public. Nor is the Corps the appropriate agency to conduct the review of a project of this nature. The Corps itself has admitted it lacks expertise on these energy and offshore land issues. There are no standards to guide agency decision-making; there has been no programmatic review of offshore wind resources to identify preferred locations; and there has been no effort to comply with well-established principles of ocean governance.

THE PROPOSED PROJECT IS NOT IN THE PUBLIC INTEREST

The CWA application fails the public interest test under which section 10 permits must be judged. The purported benefits of the project are overstated, while the negative impacts are minimized, incorrectly analyzed, or ignored. Consequently, CWA's permit application must be denied.

The impacts of the proposed project are overwhelmingly negative. A review of each of the public interest factors indicates that the project weighs heavily against the public interest. Only one factor, energy, can be regarded as positive, and even this factor is speculative and of minimal benefit. The energy this project would produce is not needed now, and would be generated at a location where it is not of any benefit for the foreseeable future. The air quality benefits are unquantified and unexplained or insignificant. The same is true for greenhouse gas emission reductions. By contrast, there are numerous serious negative impacts. Fourteen of the public interest factors face negative effects, and many of these are very significant. These negative effects greatly outweigh the minor positive impacts.

As shown in the following matrix, the proposed project results in negative impacts under virtually every relevant factor included in the public interest test. The few factors for which the project has neutral or slightly positive consequences do not overcome the extreme negative effects. For this reason, the Corps must deny CWA's application.

FIGURE 1. SUMMARY OF PUBLIC INTEREST FACTORS

§ 320.4 FACTOR	PUBLIC INTEREST EFFECT			
	Positive	Not Applicable	Insignificant	Negative
General Environmental Concerns- Air Quality	✓*		✓*	
Energy Needs	✓**		✓**	
Conservation				✓
Economics				✓
Aesthetics				✓
Wetlands				✓
Historic Properties				✓
Fish and Wildlife Values				✓
Flood Hazards		✓		
Flood Plain Values		✓		
Land Use				✓
Navigation				✓
Shore Erosion and Accretion		✓		
Water Supply and Conservation		✓		
Water Quality				✓
Safety				✓
Food and Fiber Production			✓	✓
Mineral Needs				✓
Considerations of Property Ownership				✓
The Needs and Welfare of the People				✓
<p>*Section 10 does not have a specific factor to address the purported air quality benefits upon which CWA stakes its claim of project benefits. For purposes of this review, air quality issues are considered under the "general environmental factor." Although we have assigned this factor a positive impact, this is done recognizing the speculative and insignificant nature of those benefits.</p> <p>**As discussed in detail in these comments, the energy benefits of this project also are vastly overstated.</p>				

SUMMARY OF PUBLIC INTEREST FACTORS

General Environmental Concerns - Air Quality Impacts

CWA has attempted to justify its proposed project on purported improvements to air quality, reductions of harmful emissions, and combating global warming. However, the Corps and CWA have applied a conceptually flawed air pollution analysis that seriously overstates the benefits of the project. CWA and project supporters rely on air benefits as the principal justification for the proposed action. To the extent these benefits exist at all in certain limited areas, they are inconsequential.

The DEIS's most basic air quality claim is that construction of the proposed plant would lead to reductions in emissions of health-damaging pollutants from other New England power plants. The DEIS estimates the value of the resulting health benefits at \$53 million per year. This is the largest single benefit claimed for the project, exceeding even the claims made for the value of cheaper electricity.

The DEIS makes this claim by first assuming that the proposed project will generate 1,489,200 megawatt hours of electricity a year. The DEIS claims, in effect, that the proposed project will "back out" an equal amount of electricity from fossil generation.

In fact, if the proposed project were constructed, it would not cause any reduction in these emissions, because of the nation's air pollution regulatory system that the DEIS does not mention. Moreover, even if such a back-out were to take place – and it will not – the amount of the back-out and any associated benefits would be dramatically smaller than the DEIS indicates.

The DEIS claim rests on a basic misunderstanding of how the air pollution control system already works to control power plant emissions in New England and around the country. These controls take the form of "cap and trade" programs. Such programs forbid the covered power plants, in the aggregate, to emit more than a defined "cap" amount of pollution. The government issues "allowances" to emit that amount and allocates them to individual power plants. No power plant can legally emit pollutants that it does not hold allowances to cover.

A cap and trade program makes clear that constructing the proposed project would not "back out" any emissions. Under a cap approach, whether that increased demand is met by the proposed project or by a fossil plant, emissions will remain the same.

Even taken on its own terms, the back-out analysis in the DEIS overestimates the amount of power the proposed project would generate and the amount of pollution that would be backed out.

The DEIS takes two different and inconsistent approaches to calculating the emission reduction benefits associated with the fossil-generated power it claims the proposed project will back out. At some points, the DEIS calculates this amount by referring to the emissions rates of the marginal contributor to the New England power pool, as calculated by ISO-NE for the year 2000.

However, in making the key computation of \$53 million in annual health benefits stemming from backed-out pollution, the DEIS abandons this approach, and assumes instead that the proposed project would back out power from the Brayton Point and Salem Harbor plants, two of the dirtiest suppliers in the entire system.

There is no justification for this second approach. If any emissions are backed out, they will be emissions from the marginal producer. Correcting for this error by using the DEIS's own marginal emission rates would reduce the health benefits claimed by the DEIS by about two-thirds.

Moreover, even this figure is materially too high. Marginal emissions rates will decline steadily over time as air pollution requirements get tighter. Simply using 2002 data instead of the 2000 numbers in the DEIS reduces the calculated health benefits to \$7 million.

General Environmental Concerns – Greenhouse Gas Emissions and Climate Change

The greenhouse benefits are not sufficiently large to justify the construction of the proposed project. The project's direct contribution to greenhouse gas reduction would be miniscule and temporary. The proposed project is one of the least cost-effective ways of reducing greenhouse gas emissions.

The DEIS claims that "once online the [Cape Wind] project could displace equivalent energy production from fossil plants that would otherwise annually emit on the order of 1,000,000 tons of carbon dioxide." Once again, the Corps has relied on outdated information provided by CWA in their original submittal, without acknowledging or incorporating more recent information that was readily available.

Over 7,400 MW of generating capacity have been added to the NEPOOL power supply over the past three years. This represents over 20% of the total generating capability within New England. Most of this capacity comes from highly efficient, natural gas-fired, combined cycle, generating facilities with state-of-the-art emission control equipment. The addition of this generation has had a significant impact on the marginal emissions rates in New England.

Based on the most recently available data, the numbers presented in the DEIS to support the CWA project are grossly overstated, as shown in the table below:

Comparison of Emission Reduction Calculations
DEIS Numbers vs Revised Values Based on Latest Available Data
(Tons/Year)

Emissions Reductions	Carbon Dioxide	Sulfur Dioxide	Nitrogen Oxides
As Presented in DEIS	1,108,039	4,606	1,415
Based on Most Recent (2003) Data	877,883	1,489	521
Most Recent Data as a % of DEIS Data	79.2%	32.3%	36.8%

These values represent but a fraction of total annual world greenhouse gas emissions. Since global warming is equally caused by all emissions of greenhouse gasses worldwide, these figures describe the proposed plant's potential contribution to global warming control. The air pollution and global warming benefits the DEIS claims for the proposed project are exaggerated by at least one order of magnitude. The proposed project would not reduce air pollution materially. Such an insignificant contribution cannot be justified in light of the negative effects on a unique and environmentally sensitive area such as Nantucket Sound. Air quality and climate change issues are important to address, but the CWA project is the wrong way to do so, a fact the DEIS fails to present due to its flawed analytical approach.

Energy Needs

The proposed project is not necessary to meet future regional energy needs. While the DEIS claims there is a need for power in 2008, updated and geographically relevant analysis shows that there is no need for power in New England until the 2013-2015 timeframe. By that time, other technologies and forms of renewable energy would come online (including deepwater offshore wind) that would make the sacrifice of Nantucket Sound truly unnecessary. Cost-effective and efficient sources of renewable energy are clearly desirable, but the CWA project fails to meet this description. The DEIS fails to present a clear picture of how the CWA project fits into the overall energy picture.

There are several problems with the analysis put forth in the DEIS. First, the 1.9% growth rate of electricity demand quoted in the DEIS refers to the growth rate for electricity for the United States, not the growth rate of demand in New England, which is projected at only 1.3% over the ten-year analysis period of the CELT report.

Second, the DEIS refers to a report written by LaCapra Associates in 2002, in which it conducted an analysis of the need for power in the New England region based on

the NEPOOL CELT report from the spring of 2002. Since that time, there have been two more CELT reports published by NEPOOL.

Third, LaCapra made adjustments to the Available Generating Capacity based on its own judgments of unit retirement schedules with no documentation of the assumptions used to make these judgments. By prematurely retiring these units in their analysis, it appears that LaCapra has created an artificial need for power in 2008.

Using the most recent NEPOOL CELT report issued in April 2004 and LaCapra's own criterion of 15% as the minimum reserve margin requirement before any additional generation is needed in New England, the next incremental MW of capacity is not needed until 2013. Assuming that funding of Demand Side Management (DSM) programs continues beyond 2010 (a highly probable event), the need for power would be extended beyond 2013.

The bottom line is that, according to NEPOOL's 2004 CELT report data and applying LaCapra 15% reserve margin, there is no need for power until well into the next decade. With added emphasis on DSM, this need could be postponed until well beyond the 2015 time frame. In consideration of these factors, the proposed project would have no impact whatsoever on the energy needs of the region.

Conservation

It is clear that a negative finding on the conservation factor is required due to Nantucket Sound's status as a sanctuary under Massachusetts law; its qualification as a federal marine protected area (MPA) under Executive Order 13158; and its qualifications for national marine sanctuary status. Under Massachusetts law, the very features of Nantucket Sound that would be *destroyed* by the CWA energy plant are specifically protected.

Economics

The DEIS grossly understates the economic impact of the project. The proposed project would have minimal impact, if any, on the region's consumption of fossil fuels and only minor reductions in air pollution. At the same time, it would result in the degradation of an ecological asset that plays a key role in the area's economy, substantial costs imposed on many different groups, and significant economic risks. The costs and risks of the project outweigh the potential benefits by a vast margin.

The DEIS does not account for all of the direct costs of the proposed project, e.g., the loss of revenue for the use and occupation of public lands and waters. The costs for major repairs and decommissioning also are underestimated in the DEIS.

Output overestimated:

The proposed project will likely produce less electricity than estimated and any electricity it produces probably would not displace electricity derived from fossil fuels, but rather electricity derived from other renewable sources of energy: biomass, landfill gas, or wind resources elsewhere. Consequently, the cost-savings for consumers and the human-health benefits would be far less than estimated.

The DEIS is expected to weigh the project impacts against its anticipated benefits. The two largest stated project benefits—a claimed \$25 million in reduced power costs and \$53 million in public health benefits—are directly proportional to the assumed facility power output – i.e., 1,489,200 MWh. To quantify benefits, the DEIS relied exclusively upon the project proponent's own power output estimates and studies while making no attempt independently to validate their claims.

CWA project performance is not justified using existing wind performance data. The output used to compute benefits (1,489,200 MWh) is equivalent to an annual capacity factor of 36.3% (if 468 MW) to 40.5% (if 420 MW). This performance claim far exceeds current operating experience at existing wind farms. Recent operating experience of existing New England land-based wind projects is Searsburg, Vermont, at 20.4% in 2003; Hull, Massachusetts, at 26.9% for project lifetime; Princeton, Massachusetts at 21.6% for 2002; and the more recent Madison, New York, wind project at 19.2% in 2003. The DEIS provides no evidence to support the claim for a 35-50% better performance than the Hull, Massachusetts, project located along the Massachusetts coastline that may have somewhat similar prevailing offshore wind and icing conditions.

While there are no U.S. offshore wind facilities, such facilities exist in Europe. The Danish offshore wind turbine performance in 2003 averaged only 29.4% in 2003 and 31.9% for the first 11 months in 2004. The Danish project most similar to the proposed project, the 160 MW Horns Rev wind plant in the North Sea, averaged only a 24.1% capacity factor in the first 11 months of 2004.

The existing operating data from both U.S. onshore and European offshore projects are unable to support the use of an average project capacity factor above 30 percent. The EIS contains no onsite wind tower data to confirm the developer's much higher power output estimate, despite the fact that CWA constructed a so-called data tower for that very purpose.

Overall, the combination of the historical wind turbine operating data and the projections using existing local wind datasets suggests that a lower project capacity

factor of 25-30% (1,025,000-1,230,000 MWh) should have been used to calculate wind project impacts, not 36% (1,489,200 MWh).

Tourism, fishing, and property values:

The proposed project is likely to have significant, negative impacts on the value of recreational activities and on the area's tourism industry, with tourists perhaps reducing annual spending by \$57 - \$123 million.

It is also likely to affect the fishing industry negatively. One hundred thirty turbines, located in an area where currents are strong, would pose a significant hazard and cause the industry to avoid the area altogether, causing participants in commercial fishing a significant loss in income or giving rise to additional costs and risks of fishing among the turbines.

A broader review of all the relevant evidence indicates that the project is expected to lower property values, both directly, by degrading the scenic amenities of properties with views of Nantucket Sound, and indirectly, by depressing the area's recreation/tourism industry.

The DEIS also does not consider economic risks associated with the proposed project, such as financial risks, ecological risks, and navigation risks.

Overstated cost savings:

The DEIS suggests that one of the largest benefits of the proposed project would be a \$25 million annual savings for New England customers based upon a March 2002 LaCapra study. The analysis is built upon an overly optimistic power output (1,486,000 MWh) and the assumption that the wind project output would have significant effect on marginal costs during peak demand prices. A review of the wind data and operating experience suggests that the proposed project output would be far less than assumed in the analysis. In addition, the project output during the high-cost peaking summer demand periods was often minimal to none at all. The combination of these factors suggests that the March 2002 LaCapra study significantly overstated the "annual savings."

Second, the simplified DEIS analysis does not reflect the net costs since it excludes the large subsidies being paid by the taxpayers and ratepayers that offset these purported "annual savings." The LaCapra calculations exclude the taxpayer subsidized federal tax credits, ratepayer-subsidized renewable energy credits, state-subsidized corporate tax exemption, and local tax exemptions. According to the Beacon Hill Institute (BHI), public subsidies will be made available in the form of a federal production tax credit with a present value estimated at \$98 million, state green

credits estimated at a value of \$125 million and accelerated depreciation that has a present value effect of approximately \$58 million, for a total of \$281 million.

Aesthetics

The DEIS fails to conduct an analysis of the aesthetic impacts of the proposed project. The Corps has failed to follow its own guidance in this regard. It limits the scope of aesthetic impacts to historic properties. In addition, the DEIS fails to evaluate the impact to the culture and economy of Cape Cod and the Islands of changing the dominant views from a natural seascape to an enormous industrial facility. It is widely recognized that tourists and recreationists are attracted to the aesthetics of Cape Cod's seascape and cultural heritage associated with the traditional maritime lifestyle. The DEIS recognizes that the aesthetic impacts to all the properties that it considers are "adverse," even to properties that are as far away as 15 miles. It is therefore reasonable to anticipate that these adverse effects will be detrimental to the tourism and recreation-related economy of the Cape and Islands.

Wetlands

Wetlands impacts are equated with section 404 jurisdiction, which now applies to the project site as a result of the clarified and expanded state boundaries. The CWA wind-energy plant will have negative effects on wetlands through work associated with cable installation. If proper precautions are taken, this impact will not be significant, but it will be negative. More significant are the impacts associated with the use of erosion mats (or rip-rap if the mats are not effective) around the monopiles. These mats are designed to trap sand and will result in alteration of the sea floor configuration, as well as impacts to benthic species covered by the mats. These mats constitute fill under section 404, and no permit application has been filed for this purpose.

Historic Properties

The DEIS demonstrates that the proposed project will violate federal historic preservation laws and weigh heavily against the public interest by causing immitigable adverse impacts to certain historic properties and failing to consider potential impacts to others.

The proposed project will directly and adversely affect two historic properties of exceptional national significance to the United States that have been designated by the Secretary of the Interior as National Historic Landmarks: the Nantucket Historic District and the Kennedy Compound. Under section 110f of the National Historic Preservation Act (NHPA), the Corps must minimize harm to both of these properties

to the "maximum extent possible." In this case, the only way to meet this obligation is to mandate that the CWA project be constructed outside of Nantucket Sound.

Second, the Corps' failure to consider visual effects to numerous historic properties violates section 106 of NHPA. That provision requires federal agencies to consider visual effects to any property "included in *or eligible for* inclusion in the National Register." At the request of APNS, a qualified historian has identified at least 23 historic properties not assessed by the Corps, including two properties included on the National Register, one property that has been determined eligible for inclusion, and at least 20 properties that are eligible for inclusion on the National Register.

Fish and Wildlife Values

Even a cursory review of the impacts of the proposed project on fish and wildlife resources leads to the conclusion that the project will significantly adversely impact wildlife. The proposed development will substantially alter important habitat for many species and result in ongoing disturbance to the ecosystem. Although the DEIS has not adequately evaluated a number of these impacts, and therefore cannot reach any rational conclusion regarding the scope of the potential impacts, it is nonetheless apparent that the project will have serious negative impacts on fish and wildlife values. Consequently, the public interest in fish and wildlife values is not served by approval of this project.

Land Use

The CWA wind energy plant will have negative public interest impacts on land use. There is a profound negative land use impact derived from the fact that the project would be located on the federally-controlled, public trust lands and waters of Nantucket Sound. CWA does not have, and cannot obtain, any property right or authorization for this purpose. It will "use" this federal "land," in violation of the public trust, with no compensation to the U.S. Treasury or right to do so. CWA would exclude other parties from making use of this public land and water resource, again with no right or authority to do so. It would be in trespass on federal property, and create land/water use conflicts with many other parties who seek to use the Sound for recreation, fishing, navigation, transportation, aesthetic enjoyment, sand dredging for beach replenishment, and other activities. There also will be numerous adverse effects under the land use factor as determined by the Cape Cod Commission Act. These deficiencies and the flaws in the DEIS have caused the Cape Cod Commission staff to call for a supplemental EIS.

Navigation

The proposed plant is incompatible with the marine transportation needs of the area and creates unacceptable risks to the environment and shipping. The DEIS analysis fails to address these impacts adequately. The placement of the proposed Horseshoe Shoal, Tuckernuck Shoal and Handkerchief Shoal sites are at odds with common international practice and threaten disruption of Nantucket Sound's Main Channel. The negative impacts of this project to marine transportation and public safety are significant and broad, and they pose unnecessary and unacceptable risks to cruise liner, ferry, oil transport, fishing and recreational vessels and their users.

The CWA project fails to make allowances for keeping wind plant boundaries at a suitable distance from established navigation channels and ferry routes, indicating a lack of understanding of the area in which hazards to safe navigation are posed by the wind plant. A review of existing offshore wind facilities reveals that, in contrast to the Nantucket Sound proposals, offshore wind facilities worldwide have been purposely located miles away from any active shipping channels. The Horseshoe Shoal proposal is placed directly adjacent (800 feet) to the Nantucket Sound Main Channel. In this location, no protection is afforded, as is repeatedly claimed in the DEIS, to prevent large ship and tanker collisions with the many turbines to be built along the Main Channel.

The DEIS conveys a false sense of safety and security about the risks that the turbines pose to ships, boats, passengers and the environment. It dismisses the real risks presented by vessels blown off-course, whose machinery or steering fails or whose operators make mistakes. The DEIS also claims that "physical water depth restrictions" limit the potential for a vessel to collide with a turbine. In fact, nearly 80% of the turbines are in deep enough water to be struck by the deepest vessels that routinely use the Main Channel. Such large vessels traveling at 10 knots would have less than one minute to react before traversing 800 feet and striking the nearest wind tower.

The DEIS wrongly concludes that the Cape Wind energy project will have no adverse effect on civil and military radar and communications. The United Kingdom's (UK's) Maritime and Coastguard Agency (MCA) completed a recent analysis and concluded that the presence of a wind facility produced strong maritime radar distortion not only on vessels operating within the wind energy plant but also on vessels operating up to 1½ nautical miles from the wind facility. The study also noted interference with ship collision avoidance systems, with VHF radio communications, and potentially with aircraft communications on distress frequencies. The MCA has recommended a follow-on study to further examine this interference and to recommend minimum distances that wind energy plants should be located from

navigation channels and shipping routes. The Corps has not addressed these public interest concerns.

The UK Ministry of Defence also assessed the impact of wind facilities proposed to be located within the line of sight of air defense, air traffic control, and weather radar. As a result, the UK has established a list of safeguarded sites, consisting of 40 airports and military sites, where the authorities must formally review any proposed WTG installation. These are serious potential concerns for the Cape Wind project, and they have not been addressed by the Corps.

The DEIS fails to address the safety and navigation concerns that have been repeatedly expressed by the most frequent users of the waterways of Nantucket Sound. The DEIS contains no record of letters from The Woods Hole, Martha's Vineyard and Nantucket Steamship Authority and Hy-Line Cruises, expressing safety objections and concerns over the project. It also fails to address in any meaningful way the serious concerns of the Masters and crews of the ferry boat lines carrying thousands of passengers on the long-established routes directly adjacent to the proposed wind project.

The DEIS provides no discussion or analysis to establish a baseline of pollution incidents and consequences within the vicinity of the proposed wind facility. The DEIS provides no significant information or data concerning the impact that construction, operation and decommissioning of the facility will have on the frequency, size or consequence of marine pollution incidents for the proposed sites or to Nantucket Sound. In contrast, a recently conducted independent study which examined the result of a probable tankship/turbine collision revealed extensive contamination adversely impacting and killing especially sensitive biological resources in the Nantucket Sound ecosystem resulting from such an occurrence. This study clearly indicates the need for additional spill impact analysis by the project proponent to facilitate a more realistic environmental impact review by the public and local, state and federal governments. It also demonstrates clearly the negative public interest effects of the CWA project under this factor.

Water Quality

The impacts of the project to water quality have not been adequately addressed. The discharge of a pollutant to waters of the United States requires a National Pollutant Discharge Elimination System permit. The location of the project also means that the discharge must comply with EPA's Ocean Discharge Guidelines. The Guidelines require that EPA determine whether a proposed discharge will result in "unreasonable degradation of the marine environment." The DEIS does not adequately discuss the issue of wastewater discharges or the Ocean Discharge Guidelines. As noted above,

this failure, combined with the oil spill risk created by the project, compels a negative public interest finding.

Safety

The DEIS for the proposed project inadequately addresses a number of issues that either directly or indirectly affect the public's safety and well-being in the region. These include: extreme weather impacts on the proposed facility; worker safety and facility access; and exposure to oil and hazardous substances. The proposed project may present safety hazards to employees/contractors of the proposed offshore facility. Transit to and from the facility may become difficult, and docking in heavy seas and winds may present significant safety hazards. Effects of hurricane/extreme storm events on public safety for onshore and offshore alternatives are not addressed in the DEIS.

Discussions with current and retired Steamship Authority and Hy-Line Cruise personnel and other local pilots revealed that seasonal sea ice does interfere with navigation in Nantucket Sound, requiring aggressive ice breaking activities during significant ice events. Further, given substantial ice occurrence in Nantucket Sound, the DEIS should address issues such as the likely rafting of ice around the offshore structures, the immediate proximity of the proposed plant to the Main Channel, and the risks posed by ice thrown from rotor blades.

The nine surrounding coastal towns have expressed concern over the devastating environmental effects of an oil spill within the confined shoreline of Nantucket Sound. In their letters, the Boards of Selectmen demanded that the potential effects of an oil spill be properly charted and disclosed for proper evaluation by local, state and federal agencies prior to the release of the DEIS. An independent analysis was conducted on potential spill impacts from either: 1) a tanker collision with a turbine, or 2) the transformer and diesel oils stored on the transformer platform. The result indicates that a significant oil spill event in Nantucket Sound would directly impact the Sound, Cape Cod, Martha's Vineyard, Nantucket, Vineyard Sound, proximal portions of the Atlantic Ocean and the Elizabethan Islands. Significant direct and indirect adverse impacts to the rich biological, cultural and recreational resources of the area would occur in the event of such a spill, potentially resulting in additional substantial impacts to public safety (through contaminated seafood ingestion and dermal exposure to spilled oil) and the regional economy (through adverse impacts to the fishing industry, aquaculture and tourism). A tanker collision with a wind turbine, whether rupturing two or all of the tanker's cargo tanks, would severely impact the Nantucket Sound ecosystem, killing especially sensitive fish and shellfish resources and wildlife. The larger spill is predicted to coat 217 miles of coastline, and cover

425 square miles of the Sound's surface and 869 square miles of the subsurface of the Sound.

The DEIS fails to consider in its public interest review the hazard of allowing vessels to approach the wind towers. A safety radius should have been investigated to protect: 1) the boating public and ferries from a blade breaking from its hub and being thrown; 2) vessels with masthead heights exceeding 75 feet; and 3) small boats losing control in eddy currents generated by the tower foundations. The failure to address these issues, as well as the problems noted above, compels a negative public interest finding under this factor.

Food and Fiber Production

It is likely that the proposed project will have a negative impact on food and fiber production. The construction and operation of the proposed plant will cause a localized disturbance to marine life. There will almost certainly be a reduction in productivity over the 24-square mile area and beyond. Turbidity plumes and sedimentation resulting from construction activities, scour, and anchor sweep have been greatly underestimated. The likely impact of this disturbance is that juvenile and adult fish would move away from the plumes and leave the area. Others would suffer lethal or sub-lethal effects. Seemingly localized impacts would cause population changes accumulating up the food chain with less and less predictable results higher up the trophic scale.

The fisheries community that has evolved at Horseshoe Shoal is dependent upon an open, sandy shoal environment. Conversion to a habitat dominated by high relief structures with their associated sounds, vibrations, and locally changed water flow patterns would disrupt the current finfish communities. Lacking anti-fouling protection, the turbines would quickly become encrusted with barnacles, seaweed, mollusks, etc. These 130 mini-ecosystems would likely attract some species and be avoided by others. The net effect is to cause a negative impact on fishing productivity.

Mineral Needs

The CWA wind energy plant will conflict with mineral needs. The Town of Barnstable has filed for the rights to dredge for sand on Horseshoe Shoal. This sand is needed for replenishment of eroding beaches. This proposed activity would be conducted under existing regulations, which clearly create a right for Barnstable to do so. The CWA project, which would interfere with this lawful dredging activity, can obtain no rights to use Horseshoe Shoal. In addition, the massive wind energy project

would impede these dredging rights by removing areas from access, creating navigation problems, and interposing on any rights awarded to the Town.

Considerations of Property Ownership

The resources of Nantucket Sound are the public trust property of the general public, and they cannot be taken over by this private development company. The affected OCS area is under the control of the United States and cannot be alienated without an act of Congress. Moreover, CWA seeks to avoid paying anything for the use of this property, by providing competitive bidding, rents or royalties. There could be no more dramatic examples of a *negative* property ownership.

The project will also negatively affect private property rights. This project will result in a large decline in property values for all landowners included within the viewshed of the CWA energy project. This fact is documented in the economic analysis prepared by the Beacon Hill Institute, where it is projected that property values will decline an estimated \$1.35 billion.

The Needs and Welfare of the People

The fact that the previous factors are *overwhelmingly negative* means that “the needs and welfare of the people” will be harmed by the CWA wind energy plant.

This conclusion is bolstered by the strong negative impact this project will have on other factors such as national security. As discussed above, the effects of this project on national security are significantly adverse, particularly given the interference that this project will have on domestic security detection systems.

The DEIS wrongly concludes that the Cape Wind energy project will have no adverse effect on civil and military radar and communications. Several British offshore wind energy projects have been canceled, denied or delayed because of interference with defense surveillance radar and air traffic control systems. The UK Ministry of Defence (MOD) has blocked five offshore wind farms because they could interfere with military aviation radar and the flight paths of nearby bases. The Corps has not addressed this potentially serious issue as it relates to the Cape Wind project. This concern was further raised in November 2004, when three regional airports, concerned about the 400,000 flights a year within the region, filed a formal appeal of the FAA’s determination of “no adverse effect.” This FAA appeal is still under investigation.

The DEIS overlooks the military PAVE PAWS early warning radar system, located on Otis Air Force Base, which is the backbone of the east coast terrestrial air defense system from Canada to Florida. PAVE PAWS is located approximately 20 miles

from the primary and alternative wind energy plant sites. The negative effect of wind facilities already noted in the UK may compromise the integrity of the east coast air defense system.

In addition, public recreation will be seriously harmed by the project. The affected area is popular for use by recreational boaters, and will be removed from such use. Moreover, the scenic value of the entire affected recreational resource will be seriously degraded by the project. The U.S. Coast Guard's ability to protect the surrounding coastal areas from illegal activity and security threats, and its search and rescue (SAR) missions for small boats, fishing vessels and survivors, will be impeded by the wind facility's presence. There will be clear identifiable conditions and circumstances, such as fog or high winds, when the mere presence of the WTGs will preclude a quick SAR response and rescue by a Coast Guard helicopter. This will likely delay both the search as well as the rescue response within the 24-square mile area of the wind facility until a Coast Guard boat can arrive on-scene only to be faced with radar, VHF tracking and possible communication interference attributable to the WTGs.

As shown by this discussion, the public interest factors weigh heavily against this project. When they are considered together, it is clear that the permit application fails the public interest test by an overwhelming margin.

OBJECTIONS BY STATE REQUIRE PERMIT DENIAL

The necessity of denying the permit application is even more compelling when the Commonwealth's objections are taken into account. Governor Romney has expressed the Commonwealth's clear opposition to this project. The views of affected states must be accorded special deference under both Corps regulations and the President's recent Executive Order on Facilitation of Cooperative Conservation.

As has been evident from the start of the review process, the official position of the state is one of total opposition to the project. Governor Romney, Attorney General Reilly, Senator Kennedy, and Congressman Delahunt, the Representative for the region, have each, on numerous occasions, expressed their opposition to the proposed project. For example, Governor Romney testified at a Corps hearing on December 7, 2004, in which he stated, "I've seen wind farms, and they are not pretty. If we want them in Massachusetts, we'll build them, but not here on Nantucket Sound." At that same meeting, Attorney General Reilly commented, "I support renewable energy, but there is a right and a wrong way and this is the wrong way. . . . This is no wind farm, it's a power plant." Each of these state officials has expressed opposition in formal letters as well. As such, the Corps must take those comments into account as "a reflection of local factors of the public interest." The Corps must defer to the position

of the State and affected local governments and deny the application. The Corps' section 10 regulations require that the permit be denied due to state opposition.

THE PROJECT FAILS UNDER MANY FEDERAL AND STATE ENVIRONMENTAL LAWS

The application fails under a host of environmental laws, including the Coastal Zone Management Act, Endangered Species Act, Marine Mammal Protection Act, Migratory Bird Treaty Act, National Historic Preservation Act, the federal public trust doctrine, and State laws, including the Massachusetts Ocean Sanctuaries Act, the Energy Facilities Siting Board statute, the Massachusetts Waterways statute, the Cape Cod Commission Act, and the Massachusetts Coastal Zone Management program. These legal violations are additional reasons that the permit application must be denied.

THERE ARE SIGNIFICANT PROCEDURAL DEFICIENCIES UNDER THE NATIONAL ENVIRONMENTAL POLICY ACT (NEPA)

There are numerous federal and state law procedural deficiencies that afflict the Corps' review of the proposed project. The DEIS is insufficient because the applicant has played an improper role in virtually every aspect of the NEPA process; the DEIS is not objective; the Corps has failed to conduct a programmatic EIS; the DEIS relies on inadequate and incomplete data; and the DEIS fails to consider the proper state boundaries.

THE ALTERNATIVES ANALYSIS IS INADEQUATE

The DEIS fails to review alternatives adequately. It does not establish an appropriate EIS purpose and need statement, uses an illegally constrained alternatives review, and fails to identify and adequately address project impacts.

The DEIS purpose and need statement is crafted narrowly to advance the applicant's profit-making goals, not the public interest, and violates NEPA. The Corps' overly restrictive purpose and need statement compromises the entire review of the CWA project and invalidates the DEIS. The narrow terms of that statement, particularly the limitation of a "utility-scale renewable facility (200 MW or larger)" designed to deliver electricity solely to "the New England grid" are intended to produce a specific result, i.e., approval of the applicant's preferred alternative on Horseshoe Shoal. In fact, the record of power projects in New England demonstrates that there is no basis for equating the "utility scale" limitation with 200 MW; the record for such projects in New England is 20 MW. This is the threshold used by the American Wind Energy Association. By impermissibly restricting purpose and need, the Corps also has limited the review of alternatives to only a very few sites and only one technology.

The DEIS fails to consider any technology other than wind in any area other than the immediate vicinity of Nantucket Sound. Such an approach violates NEPA.

The Corps' alternative analysis is further invalidated by the improper screening criteria used to identify alternatives. With respect to project risk, the Corps does not account for the differential risk of onshore wind versus offshore wind. Most of the wind projects in the world are onshore. Onshore technology is an established and reliable technology, whereas offshore technology is much less mature and is still evolving.

The criteria used by the Corps are applied without regard to trade-offs that exist between different elements of the criteria. For example, land-based sites can often be economic with less wind than offshore, yet the same wind class screen is used for both.

The Corps criteria also do not consider the issue of economic viability. Failed plants are not in the public interest. Thus, the Corps needs to review the developer's financial plan for the project sufficiently to ensure that the project is viable. This is particularly relevant since there is such a large inventory of projects that, while not bankrupt, are sufficiently non-performing that their owners have turned them over to the bank. The public has a right to know this information and comment on it especially since a public trust resource is at stake.

A second aspect of economic viability deals with the issue of what happens in the event the plant needs to be removed, either as a result of a premature event or at the end of its useful life. The Corps must ensure that the developer has made separate arrangements so that when and if the plant needs to be dismantled, there are sufficient funds to do this, which were separate from the funds related to building and operating the plant.

The screening criteria also are flawed because they rely upon outdated information on transmission capacity and make false assumptions on the nature of purported "bottlenecks" in the system.

By failing to use a valid set of screening criteria, the Corps did not consider at least eight alternative sites, still under the unlawfully narrow purpose and need statement of the DEIS. These sites easily fit within NEPA requirements for reasonable alternatives, and the failure to account for them renders the DEIS invalid.

If a proper purpose and need statement is developed--to provide a feasible utility-scale, clean energy project (i.e., greater than 20 MW) within the Northeast (Canada/United States) and Mid-Atlantic region, for which the public interest advantages outweigh the costs to the public interest--a reasonable set of alternatives

would be identified. These alternatives include offshore wind projects (including deepwater sites that would be available before there is a regional energy need), onshore wind projects, other forms of renewable energy, and clean energy projects that provide substantially similar or better benefits for the public.

THE WIND ENERGY PLANT WILL DESTROY THE SANCTUARY STATUS AND MARINE PROTECTED AREA VALUES OF NANTUCKET SOUND

All state waters within Nantucket Sound are designated as a marine sanctuary under State law. The purpose of that designation is to protect the very values of the Sound that would be destroyed by the project, including its scenery and overall ecology. The unique nature of the Sound also has caused it to be placed on the list of areas for consideration as a federal marine sanctuary. The designation of the state waters qualifies the entire Sound for MPA status under Presidential Executive Order 13158. For the Corps to comply with that Order, it would have to deny this permit application because it will cause harm to the protected values of the Cape and Islands Ocean Sanctuary.

The DEIS is deeply flawed in its complete failure to address the special status of Nantucket Sound as: a sanctuary under State law; an area that meets the federal definition of an MPA; and an area that is subject to National Marine Sanctuary review. This failure leaves the Sound vulnerable to projects like this one, which will destroy the very values that give the Sound these features deserving of protection. This failure is especially inappropriate, since it is possible to have *both* under a proper decision-making process: protected status for the Sound, and offshore wind in properly-sited locations.

NEITHER THE CORPS NOR CAPE WIND HAS ADDRESSED THE CLARIFIED STATE BOUNDARIES

It has now been announced that the Massachusetts boundary extends into the project site. This is a self-executing, factual determination that carries with it full Massachusetts regulatory jurisdiction and the State's power plant prohibition in marine sanctuaries. It also makes the lands and waters within the clarified boundary part of the Cape and Island Ocean Sanctuary. These are major changes that both the Corps and CWA knew were forthcoming, yet the DEIS is silent on the issue. The failure to address the application of Massachusetts jurisdiction to this project requires a supplemental EIS.

THE DEIS IS FILLED WITH TECHNICAL DEFICIENCIES

The Alliance commissioned over 30 technical consultants to review the DEIS. In the short, and inadequate, public review period provided by the Corps for the multi-

volume DEIS, these consultants developed over 400 pages of comments on the deficiencies of the document. The message of these comments is clear: the DEIS is a result-oriented, technically deficient review that does not meet professional or legal standards. Further review of the CWA proposal therefore requires a supplemental EIS.



COMMONWEALTH OF MASSACHUSETTS
MASSACHUSETTS SENATE

STATE HOUSE, BOSTON 02133-1053

SENATOR JARRETT T. BARRIOS
MIDDLESEX, SUFFOLK & ESSEX DISTRICT
ROOM 309, STATE HOUSE
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E-Mail: jbarrios@senate.state.ma.us

COMMITTEES
PUBLIC SAFETY (CHAIR)
HEALTH CARE (VICE CHAIR)
HUMAN SERVICES
THIRD READING

February 22, 2005

Karen Kirk Adams
Cape Wind Energy Project EIS Project Manager
Corps of Engineers, New England District
696 Virginia Road
Concord MA, 01742-2751

004138

Dear Ms. Adams:

I am writing to express my support for the Cape Wind Project being reviewed by the Army Corps of Engineers. Wind energy is a step forward along the path to cleaner energy that will reduce our state's reliance on the dirtier energy sources contributing to global warming. Clean energy production also promises to generate thousands of new jobs for our state's residents.

The emission of toxic gases as a byproduct of traditional power plants poses both a risk to the distinct landscape of New England, and, more importantly, to the health of its residents. These harmful gases not only contribute to global warming which is responsible for an increase in both temperatures and sea levels, they also pose frightening health risks for the state's residents.

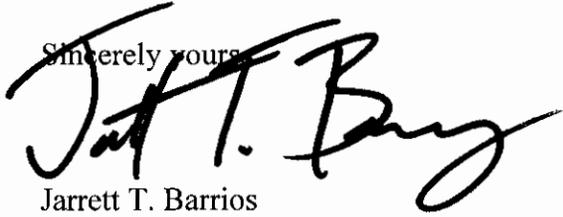
The fossil fuels emitted into the air are major contributors to asthma, respiratory illnesses, and even death. The Environmental Protection Agency estimated that fossil fuel power plants in Massachusetts are responsible for 300 premature deaths, over 700 heart attacks, and over 8,000 asthma attacks each year. Nationally, power plants are responsible for 23,600 deaths, 38,200 heart attacks, and 554,000 asthma attacks per year, as reported by the National Campaign against Dirty Power.

As the rates of reported cases of asthma continue to skyrocket across the country, a simple remedy is the construction of clean energy production. The draft environmental impact statement (DEIS) being considered by your agency found that the Cape Wind Project will reduce greenhouse gas emissions by over one million tons each year. Furthermore, Cape Wind will economically benefit the consumers of New England. The wind farm will produce 74% of Cape Cod, Nantucket, and Martha's Vineyard's electric

daily needs, with the output of 454 megawatts of power annually. The project would also generate thousands of new construction-related jobs. Equivalent to 1% of the electricity used in New England, the power created by Cape Wind would replace 113 million gallons of oil per year. According to the state's Energy Facilities Siting Board, New England consumers will collectively save approximately \$25 million a year on electricity prices, while Massachusetts residents will save about \$10 million.

The construction of the Cape Wind Project is a necessary to promote cleaner air, jobs for future, and less reliance on polluting energy production. Thank you very much for your attention in this matter. If I can be of further assistance, please do not hesitate to contact me at (617) 722-1650. I am,

Sincerely yours,

A handwritten signature in black ink, appearing to read "Jarrett T. Barrios". The signature is fluid and cursive, with the first name "Jarrett" and last name "Barrios" clearly legible.

Jarrett T. Barrios
STATE SENATOR

Cc: Ellen Roy Herzfelder, Secretary, Executive Office of Environmental Affairs
David Borrus, Pile Drivers' Local Union 56
Erik Gehring, Boston Climate Action Newtwork

23 FEB 2005

Janis Aldridge, Inc.

17th - 20th Century Furniture, Engravings &
Decorative Accessories

604139

RECEIVED

FEB 23 2005

Dear Colonel Koning,

I have been a summer resident & business owner in Nantucket for 30 years. Like many other residents, I enjoy the pristine views from our island and would hate to see them ruined by gigantic windmills. I cannot imagine anything uglier to look at from land, from sea, or from air.

Aside from being an aesthetic nightmare, I would hate to know how many innocent little birds will get mauled by windmills while going about their daily business.

Sailors & ferries will be forced to navigate (an already tricky route) thru these windmills, which will raise the risk of an accident. As if we need any more accidents!

Please - do not go thru with this proposal. It will be a disaster!

Janis Aldridge
Sawyer

GEORGETOWN
2900 M Street, N.W.
Washington, DC 20007
Phone: 202-338-7710
Fax: 202-338-5301

NEW YORK
16 East 77th Street
New York, NY 10021
212-288-5882

NANTUCKET
6 Coffin at Washington Street
Nantucket, MA 02554
Phone: 508-228-6673
Fax: 508-325-0589



A NOTE FROM
Isabelle Savoy



004140

I live in W. Yarmouth, near
the ocean. It is beautiful
if they put the Wind Mills
up it will destroy the fish
birds and the fishermen who
make a living. You live in
Concord not near the ocean
how would you like it in
your backyard? We would
not gain anything from
this Cape Wind only another
waste.

A concern
lover of the Cape.

MSPCA

Bringing kindness and comfort to needy animals.

Catherine D. Thomson
12 Mill Road
Harwich Port, Massachusetts 02646

February 21, 2005

004141

Dear Colonel Koning,

Having attended meetings of the Alliance to protect Nantucket Sound, I have tried to keep an open mind about the wind project in Nantucket Sound. At this time, I see no reason how the wind farm could possibly be the highest and best use of this site.

As long as the wind project is located in an exposed area with a good wind, there is no value in situating it in an area where it could damage or harm fishing boating, tourism wildlife cause oil pollution etc, etc

Please register my vote as NO.

Thank you. Sincerely, Catherine D Thomson

State of Rhode Island and Providence Plantations

SENATOR
DAVID E. BATES
Deputy Minority Leader
65 Primrose Hill Road
Barrington, Rhode Island 02806
District 8

Room 120, State House
Providence, Rhode Island 02903

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Senate Chamber

Committee on Commerce
Housing and Municipal Government

Committee on
Constitutional and Gaming Issues

Committee on Financial Services,
Technology and Regulatory Issues

Committee on Labor

February 17, 2005

004142

Karen Kirk-Adams
U. S. Army Corps of Engineers
New England District
Cape Wind Energy EIS Project Manager
696 Virginia Road
Concord, MA 01742

Dear Ms. Kirk-Adams:

I write to express my strong support for the Cape Wind project. This project would add a considerable amount of clean and renewable electricity to the New England electrical grid. In 2004, the Rhode Island legislature enacted a renewable portfolio standard for the purpose, among others, was to reduce air emission and foster economic development in new generating technologies. I am pleased to say that I was one of the primary sponsors of this pivotal legislation.

I respectfully urge you to complete your review of this proposal with a prompt and favorable decision. This has been one of the most rigorous regulatory processes in the history of the region and has confirmed that there are no serious environmental impacts of the proposal that could offset its overwhelming public benefits.

I also urge you to act promptly because the full amount of Cape Wind's output will be needed shortly in order to meet the requirements of New England's various RPS programs and greenhouse gas commitments. Our Rhode Island RPS, for example, requires a 3% renewable content by 2007, with higher amounts required in the following years. These public goals can only be met with the timely approval of renewable projects of the commercial scale proposed by Cape Wind.

Thank you for your consideration and prompt attention to this matter.

Sincerely,

David E. Bates
DEPUTY MINORITY LEADER

DEB:plm

RECEIVED
FEB 18 2005
SENATE CHAMBER

Karen Kirk Adams
Cape Wind Energy Project
EIS Project Manager
Army Corps of Engineers
New England District
696 Virginia Rd.
Concord, MA 01742-2751

004113

Dear Ms Adams:

Thank you for providing me with the opportunity to comment on the preparation of the Environmental Impact Statement (DEIS) for the Cape Wind Energy Project. My messages are simple. First, I feel that we need to develop wind power for New England and that every effort should be made to choose an appropriate off-shore site for this proposed project. Second, I am concerned about building the project in an area where there are lots of flying birds. Thus, the alternatives in Nantucket Sound must be examined more fully, and compared with the alternative that is further off-shore, near Tuckernuck Island. This comparison should be fully developed in the revision of the DEIS (FEIS). If it is determined that that the risks to endangered birds (roseate terns and piping plovers) would be less off of Tuckernuck Island, then this location should be given consideration for permitting.

Thank you very much,

Joanna W. Crawford
Joanna W. Crawford
20 Old Concord Road
Lincoln, MA
01773

February 24, 2005

RECEIVED

FEB 25 2005

01742-2751

Feb 19 1953

To US Army Corps of Engineers

304144

I am writing you this note just to let you know how much I agree with the effort your dept. is putting into the Wino-Tann project. I believe putting another power source powered by wind/sun is the way of the future.

When I drove along the Cape Cod canal and see the vulnerability of these bridges with links strong cut across the water and the power plant sitting there being fed a fuel source of gas or oil. God knows how long that will last, I have to believe in using the wind or sun for future power.

Bob DeCarry
9 Par 3 Court
Mashpee Ma
02649

RECEIVED
FEB 20 1953
ENGINEERING
DIVISION

NOTE: I sent my contribution to Hyannis as the name letter suggested.

CHARLES & BARBARA BIRDSEY

004145

Comments on the Draft Environment Impact Statement for the Proposal for an Offshore Wind Project in Nantucket Sound

To: Karen Adams, Project Manager
US Army Corps of Engineer, New England District
696 Virginia Road
Concord, MA 01742

I am a resident of Cape Cod and have been for most of my life. I have seen many changes over the years, some for the good, and others not so good.

A few years ago there was talk about a wind farm on Horseshoe Shoals and at first I did not pay much attention, nor did others thinking it ~~someone's~~ crazy idea and it will go away. Well, it ~~isn't~~

Now we are faced with the reality that there is a chance that it may happen. I have read most of the pros and cons of the project, attended meetings and read reports. Very credible organizations such as the Center for Coastal Studies see the need for permanent protection of Nantucket Sound and other waters surrounding Cape Cod. The Alliance to Protect Nantucket Sound has done a great job in bringing the issues to light. I don't need to go into all of the problems this project would/could create. Cape Cod does not want it nor need it.

The bottom line is that I feel the draft EIS is totally inadequate in consideration of the many negative environmental impacts that Cape Wind would bring.

Thank you for your consideration.

Sincerely,


Charles J. Birdsey

To: Colonel Thomas Koenig

Fax: 978-318-8303

cc: MEPA

Fax: 617-626-1181

Date: 2-24-05

4145
~~004146~~

Re: Comments on The Cape Wind DEIS

From: Christopher D. Birdsey
23 Hilliards Highway
West Barnstable, MA 02668

Job	7671	Date	2/25/05	# of pages	3
	Koenig	From	J. M. Osephuk		
	US Army Corp Eng	Co.	Full Spectrum Colls		
Phone #		Phone #	978-287-5849		
Fax #	978-318-8303	Fax #	978-318-9303		

This Fax inadvertently sent to
978-318-9303 + is being
forwarded to correct #
978-318-8303

**To: Colonel Thomas Koning:
U S Army Corps of Engineers
696 Virginia Road
Concord, Ma 01742**

I am a Cape Cod native and tax paying citizen, also one of the thousands concerned for the welfare and future of Nantucket Sound. I believe if this proposal were to become a reality the results would be disastrous. We all want a cleaner planet in conjunction with seeking alternate means of producing energy for our children. But, on that same note, a healthy earth should also preserve its natural beauties. Let's be honest, Nantucket Sound is one of the few beautiful places left for local residents and tourist to enjoy. People come here to get away, see our pristine views and gorgeous shorelines, not to look at the horizon and see industry.

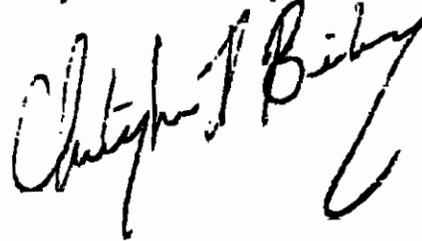
The dangers Cape Wind presents to navigation, wildlife, geography and aesthetic beauty clearly outweigh the advantages.

The project, only 4 miles from some of the Cape 's shore, poses a nightmare for mariners. Being a tugboat Pilot myself, and having worked on several different kinds of boats, I'm quite certain that the many commercial vessel's that transit the Sound will find it extremely difficult to deal with increased congestion, especially in reduced visibility. To perform rescue operations in less than perfect conditions such as high winds, rough seas and strong currents are a sure recipe for damage and possibly loss of life. Suppose a tug and her tow become separated and the barge drifts into the structures. Or imagine if the self-propelled tanker Great Gull loses power and becomes entangled, puncturing her holds and spilling petroleum? What about those inexperienced sailors at the helm of their new 65ft sloop carelessly sailing to close or lost in fog? Today there are more recreational boaters than ever before. Believe me, in summer, it seems like they all come to Nantucket sound. In like manner low flying aircraft in bad weather will experience difficulty avoiding these massive structures.

I would also like to point out that, like many others, I do not think the Draft EIS adequately addresses the number of issues effecting wildlife and their habitat. It is well known that this is a major migratory route for many species some of which are highly endangered.

I seriously believe that Horseshoe shoals and all of Nantucket Sound is and should always be a marine sanctuary. Thank You for listening.

Sincerely,
Captain Christopher D Birdsey

A handwritten signature in black ink, appearing to read "Christopher D Birdsey". The signature is written in a cursive, somewhat stylized font.

February 24, 2005

To: U.S. Army Corps of Engineers

From: Maura McGroarty

P.O. Box 1746

Oak Bluffs, Ma 02557

Re: "Windmill" Project

4146

RECEIVED
FEB 25 2005
U.S. ARMY CORP OF ENGRS

Please, please, please do not think every-
one on the Cape and Islands is opposed to
this conservation (albeit a private enterprise)
project. Ideally our government would have
thought of doing such projects long ago for
the public's benefit - it never happened nor
was it likely to happen. The United States
has to do more conservation of resources and
find cleaner, less damaging sources of
energy than is currently the case. If this
project's benefits outweigh the detriments
(which I understand are minimal) it should
be approved.

People from small communities such as the Cape
and Islands (especially those of us who work
and have restricted time for meetings) are
careful about expressing points of view that
may be contrary to a popular, well-funded,
political group. Please be aware of that as

McGroarty
02 557-1746

you decide whether this project is approved. Actually, I would hope that politics or emotional public opinion are not a consideration in place of factual data.

It is very interesting to see who are the leaders/supporters of the opposition to the Cape Wind project - generally, on Martha's Vineyard, they are in the forefront of conservation issues. The NIMBY mindset is alive and well here!

Finally, I find it ironic that one of the Cape towns (Barstable, I believe) will propose dredging the designated area to replenish their beaches. Although this action is probably only obstructionist, it does reflect the negative, at all cost, perspective of the project's opponents.

Please, please, please give your approval. There is such a long way to go - the sooner we achieve renewable energy options, the better all of us will be.

Maura McGroarty

004147

Dear Secretary Herzfelder and Ms. Adams

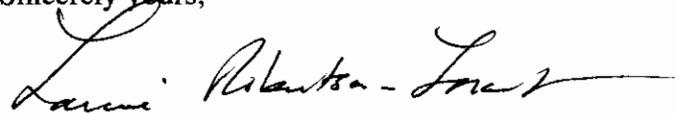
The evening of the public hearing on the wind farm at MIT, I placed a written version of my spoken comments in the box designated for that purpose.

I am further submitting herewith six articles, which include two op-ed pieces I wrote for the *Standard-Times* of New Bedford. My articles are entitled "Wind Power Could be an Economic Engine for the City" and "SouthCoast Deserves Public Hearing on Wind." With them, I am also submitting John Bullard's piece on "The Environmental Justice of Wind Project," plus an editorial called "Leaders must take a new look at wind project, a letter from a Mattapoisett resident who attended the Yarmouth hearing, and a news article on Susan Tierney's support for the wind farm.

From what I heard at MIT, you will be receiving many eloquent and persuasive letters in support of the wind farm near Nantucket, and I support the many well-informed people who spoke that night.

Thank you for your consideration.

Sincerely yours,



Laurie Robertson-Lorant, Ph. D.
3 Meadow Street
So. Dartmouth, Mass. 02748

RECEIVED

APR 17 2006

SECRET

The environmental justice of wind project

YOUR VIEW

From 1986 to 1992, I was the mayor of New Bedford. I lost my last election by 390 votes because I sited a sewer treatment plant in a neighborhood that wanted clean water but didn't want to be near the plant. I am very familiar with NIMBY (Not in My Back Yard) and all the clever fake arguments used to disguise it.

I also serve as a volunteer president of the Board of the Coalition for Buzzards Bay. From 1993 to 1998 I was Director of the Office of Sustainable Development in the National Oceanic and Atmospheric Administration. Now I am president of an education program that teaches college students about the ocean.

I submit my comments, not in any official capacity, but as a citizen. I support Cape Winds application and the review process currently under way by the U.S. Army Corps of Engineers. I believe the findings in the draft environmental impact study show that the benefits will far outweigh any harm and that the project should proceed without delay.

should be independent decisions.

While no project is without risk, I conclude that the risk to birds, to fish habitat, to navigation, to commerce and other interests in Nantucket Sound is minimal. I find that the argument that we are allowing private ownership of a public resource without compensation to be inconsistent. The people who argue this have not called for compensation by the owners of Brayton Point or Canal Electric, who have "taken" our public resource of clean air without compensation (I have had asthma my entire life).

They do not argue that commercial fishermen should compensate us for taking fish that are a public resource. I agree that the federal, state and local governments should set up a process for private use of public waters. But based on how little has been done to date on this important topic, why make further delay a tactic to kill this project?

This project should be approved and we should work hard and fast to get "ocean zoning" in place. But they

people who are out of their sight. I have no sympathy.

The visual impact is hard to argue with facts or logic. It is in the eye of the beholder. I find the wind farms beautiful. Others I know do not. I find the smoke plumes that come out of Canal Electric to be ugly (as well as unhealthy), but on most days the wind projects opponents do not have to look at (or breathe) those plumes.

And that leads to my final point: economic justice. I live in New Bedford where we have always looked at smoke stacks, factories, outfalls, jails, railroads, hurricane barriers and all the other things that society needs. A year and a half ago, we looked at 98,000 gallons of No. 6 fuel oil wash up on our beaches because the incompetent barge operator couldn't find his way all the way to Canal Electric.

We breathe polluted air from last-generation power plants. Our young people give their lives in Iraq protecting a foreign source of oil. The good people in the Vineyard, Nantucket and the Cape who do not want their view "spoiled" benefit because so many of the "ugly necessities" get provided by

I am not out to "Save the Earth." I think Earth will do a great job of that herself. The question for me is whether there will be a place for us humans in that picture or whether we will foul our own nests to a degree where earth becomes uninhabitable. What are the consequences of climate change? Who knows for sure? Severe weather, mini ice ages, sea level rise, spread of disease. I don't know but we are running an experiment with the only planet we have. What are the consequences of renewable energy? Cleaner air. New jobs. Better health.

I cannot agree with those who purport to support wind power but say not here, not now. "If not now, when? If not us, who?"

John K. Bullard is the president of the Sea Education Association in Woods Hole. This was his testimony at the public hearing on the Cape Wind project. The public is encouraged to comment before Feb. 2, 2005, by e-mail or in writing to the U.S. Army Corps of Engineers. You can e-mail public comments to wind.energy@usace.army.mil.

Standard - Times 12/26/05

Wind power could be economic engine for city, SouthCoast 11/30/04

YOUR VIEW

✓ **Dr. Laurie Robertsen-Lesant** of Dartmouth is a full-time visiting lecturer in the Education Department at UMass Dartmouth and the author of "Melville: a Biography."

hog houses. The other is the disposition of the NStar property once earmarked for the New Bedford Oceanarium.

According to the paper, Sen. Mark Montigny expressed his opposition to the mayor's willingness to turn the NStar plant over to the Redevelopment Authority. Sen. Montigny has called for "an extended, transparent planning process that solicits input from the state's development agency, the local legislative delegation, the New Bedford City Council, local business leaders and the public" — in other words, a comprehensive and coherent plan subject to community participation and public review.

The mayor likes to call himself a "man of vision," but in the vital matter of clean, renewable energy, he has been blind to the realities and opportunities of wind power and other sources of renewable energy.

On Nov. 18, the South Coast Chapter of Clean Power Now met for a

Any plan for the healthy future of New Bedford and the SouthCoast must be based on sound environmental policy as well as economic concerns.

presentation and film on Denmark's North Sea wind power project.

Although we invited Mayor Kalisz to our meeting, he did not favor us with either a reply or an appearance. If he had attended the meeting, he would have learned that the new Vestas blades are noiseless, durable and harmless to migratory birds, and that the manufacture of wind turbine blades in New Bedford would create hundreds of new manufacturing jobs paying \$19 to \$23 an hour.

According to Commonwealth Development Chief Douglas Foy, keynote speaker at the recent Sustainability Conference at the Massachusetts Institute of Technology, one of the key ingredients of a thriving urban center is a vibrant waterfront. It's not surprising, therefore, that

General Electric wants to locate a wind turbine manufacturing plant in New Bedford, which is a deepwater port and a free-trade zone conveniently situated between ports and markets in Long Island and in Canada. From GE's point of view, the NStar site would be the perfect site for the manufacture of wind turbine blades.

The building has 70-foot high ceilings, and New Bedford has the necessary ship and (with the new freight yard) rail-based transportation infrastructure and the right educational infrastructure for training a multi-skilled workforce.

This is a tremendous opportunity for economic and environmental development that New Bedford cannot afford to lose. Any plan for the healthy future of New Bedford and the SouthCoast must be based on sound environmental policy as well as economic concerns.

We need jobs that train young people for secure lifelong careers — jobs that pay well, give medical benefits and pensions, and don't contribute to the degradation of the natural environment and the current increase in physical and mental health problems.

Opportunities for young people in cutting-edge industries such as wind

power and other innovative technologies would go a long way to reducing the poverty and hopelessness that cause drug addiction and lethal gun violence in the city's streets.

Wind power is the cleanest and cheapest and most evenly distributed source of power on the planet. Most European Union countries are way ahead of us in reducing their dependency on fossil fuels, protecting the environment and improving public health.

If community leaders and politicians would collaborate with GE's wind turbine engineers and environmental scientists from UMass Dartmouth's School for Marine Science and Technology, Woods Hole Oceanographic Institute, Mass Audubon and MIT, New Bedford could become a regional center for cutting-edge environmental technology such as wind power and green buildings that would create jobs in research and development as well as manufacturing.

This kind of interdisciplinary thinking, along with the proposed reconnection of the city's waterfront to the historic district and the new arts and education district a few blocks uptown, could make the whaling city's long-overdue renaissance a reality.

The SouthCoast is fortunate to have a regional newspaper as attuned to the relationship between economic and environmental issues as The Standard-Times. The Sunday, Nov. 20 edition was an especially striking example of this, and striking contrast to The Cape Cod Times, which appears to support news about global climate change, dangerous toxins in the fish we eat and a harmful invasion of sea squirts that live on sewage near Georges Bank. There was good news in the form of official opposition by Senators Kennedy and Kerry to the construction of a liquefied natural gas terminal in Fall River as well as active citizen opposition to the re-licensing of the outmoded Pilgrim nuclear power plant.

Other good news included a piece on the nearly-completed freight and commuter rail yard on the reclaimed brownfields site along Heman Melville Boulevard and another on local towns that plan to install wind turbines.

Two articles pointed to issues that have not been resolved, however. One dealt with the urgent need to implement Smart Growth policies to preserve the open space that is rapidly being gobbled up and developed for shopping malls and outsized, energy-

The Standard - Times

11/30/04

...tive high school. She is
 ...lumn and MCAS, but
 ...es the curriculum can be
 ...in a much more
 ...ve, integrated, hands-on
 ...n than goes on at most
 ...reprehensive high schools.
 ...Iso believes students will
 ...ately retain this learning
 ...1 longer because it is
 ...ant to their lives.
 ...ie charter high school
 ...it not be for everyone, but
 ...ght be just the right place
 ...tudents who need that
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 ...Shakeel Najjar didn't even
 ...ler the city's 3,500-
 ...it high school when she
 ...the charter high school.
 ...ith such a big school,
 ...s a lot of pressures on the
 ...nts that don't even relate
 ...oolwork," she said,
 ...g that there is pressure to
 ...ress a certain way and act a
 ...ertain way.
 ...Shakeel said she wants to
 ...ocus on her academic work
 ...without those distractions. "I
 ...think this is a better program
 ...o prepare you for college. And
 ...t works for people who are
 ...determined."
 ...Parents and students who
 ...are interested in learning more
 ...about the charter high school
 ...can call to arrange a visit.
 ...Enrollments will be accepted
 ...until Feb. 28 for the 2005-06
 ...academic year.
 ...For more information, call
 ...the school at (508) 979-4242.

SouthCoast deserves public hearing on wind

YOUR VIEW

In Sunday's Standard-Times, David Kibbe reported that most of those who attended the public hearing sponsored by the Army Corps of Engineers last Thursday at the Massachusetts Institute of Technology spoke in support of the Cape Wind project, which was true. He neglected to mention, however, that in scheduling hearings in Yarmouth, Martha's Vineyard, Nantucket and at MIT, the corps bypassed SouthCoast, which is grossly unfair.

I attended the MIT hearing expressly to request a public hearing in New Bedford or somewhere on SouthCoast. We are trapped between two of the dirtiest power plants in New England and we bore the brunt of the disastrous oil spill. It is patently unfair of the corps to hold hearings in affluent places while ignoring the blue-collar cities of New Bedford and SouthCoast. As Sunday's Standard-Times editorial, "Divided society hurts us all," remarked, cities such as New Bedford have lost political power because they have grown "increasingly non-white and poor." This raises the issues of social and environmental justice. Wind power is one of the

cleanest and most democratic forms of energy on Earth, and the Cape and Islands and SouthCoast are blessed with more wind than many other communities. The proposed wind farm will generate enough power to begin a phase-out of coal-burning power plants, and wind turbines will affect wildlife much less than continued emissions of filthy fossil fuels.

General Electric, in collaboration with Vestas, which supplies wind turbines for the North Sea wind farm in Denmark, might be interested in manufacturing wind turbine blades in New Bedford because it is a deep-water port. Surely the city can find a suitable building among the old mills that line the waterfront for a plant that would attract environment-friendly technology to New Bedford. The city and area need meaningful jobs, jobs for which young people and older workers can be trained and well compensated.

A number of SouthCoast communities are considering erecting at least one wind turbine. Hull, which derives energy for street lights from a

turbine, is about to erect its second. The turbine has drawn many tourists to Hull. As an educator, I was excited to learn that Hull addresses wind and other energy issues in its public school curriculum.

Providing our oil-choked planet with clean, renewable energy is an environmental issue, a public health issue, an economic issue, a foreign policy issue, an educational issue and a moral issue. We cannot continue our suicidal dependency on addictive, polluting fossil fuels without dooming ourselves and fellow life forms to eventual extinction.

If our political "leaders" cannot imagine how New Bedford and SouthCoast can be transformed to meet the environmental, economic and educational challenges of the 21st century, they should appoint representatives from UMass Dartmouth's School for Marine Science and Technology and other departments of the university, businesses, the public, private and parochial schools, and the many environmental, historical and arts organizations and charge them with developing a comprehensive,

multidisciplinary plan for SouthCoast. SouthCoast residents deserve a public hearing in New Bedford or at UMass Dartmouth, but only strong public demand will persuade the Army Corps of Engineers to hold another hearing before the Feb. 24 deadline. I urge all concerned citizens to address a request for a hearing to Karen Kirk-Adams, Cape Wind Energy EIS Project, U.S. Army Corps of Engineers, New England District, 696 Virginia Road, Concord, MA 01742.

Additionally, to offset the efforts of the Alliance to Save the Sound, which has financial support from big oil and gas companies, supporters of the wind farm can write to or call their senators and representatives and the Massachusetts Office of Environmental Affairs, 100 Cambridge St., Suite 900, Boston, MA 02114, attention: Anne Canaday, EOE No. 12643. Copies of the draft environmental impact study and transcripts of the four public hearings are or will be available online.

Laurie Robertson-Lorant of Dartmouth teaches at UMass Dartmouth.

The Standard - Times 12/2/04

CLAIM MORE

LETTERS

Cape Wind could be a model

I attended the Army Corps of Engineers' draft environmental impact study public opinion hearing in Yarmouth Tuesday night. They opened by emphasizing that a limit of two minutes would be imposed on each speaker, but out walks Gov Mitt Romney, who spoke for about 10 minutes, bashing the project. Then Attorney General Tom Reilly blasted the project for five minutes; the rest of us got our two minutes.

Everyone was respectful of the speakers for the most part until proponents of the wind power project started speaking. Once a speaker's two minutes were up, you started hearing people with Save Our Sound stickers on their clothing yell toward the stage. My personal view of this project is that it should be allowed to move forward. I'm tired of ozone alert days. I'm tired of the Canal Electric oil barges passing by our beaches. I'm tired of not-in-my-back-yard feelings. As a student studying civil engineering and someone who has sailed in Nantucket Sound many times, I feel this project will have a positive impact on the region. In my lifetime, oil reserves across the globe will be exhausted, leaving future generations with a gigantic problem that we can start solving now. Opponents say that it will result in the industrialization of Nantucket Sound, but isn't the sound already somewhat industrialized, with large fishing fleets dragging nets across the bottom? Opponents say there is no precedent for leasing the land, but the Department of the Interior already leases land for offshore oil rigs. Something has to be done about our energy needs, which are continually growing. Why not start here and now? Why not make Cape Wind the model of success?

NATHAN KETCHEL
Mattapoissett

Leaders must take a new look at wind project

Who says the leaders of two political parties have difficulty uniting?

Sen. Edward M. Kennedy, the liberal lion, and Gov. Mitt Romney, the Republican governor, have long been united in their opposition to the Cape Wind project in Nantucket Sound.

But both men and their followers now have a 4,000-page federal environmental impact study to show them that they need to reconsider their opposition.

The long-awaited federal study shows the country's first proposed offshore wind farm would have significant long-term environmental and energy benefits, and would create only a few temporary environmental problems for birds and fish.

The long-term benefits are well known. The 130 turbines in Nantucket Sound would provide electricity to nearly three-quarters of the homes and businesses on the Cape. Massachusetts would begin to wean itself off electricity created by burning fossil fuels.

These coal- and oil-burning power plants not only cause thousands of premature deaths, asthma attacks and hospitalizations in our region, but they also contribute to the greenhouse gases that are speeding the warming of the planet, the rising of the seas and the loss of coastal land.

The wind farm project also would help this area begin to unhook from foreign oil that is

drawn from troubled parts of the world.

And as a young letter writer recently pointed out to The Standard-Times, the wind farm will create many new jobs in clean-energy technology that are good for workers as well as for the soul of the community. Workers and communities suffer psychologically from being the host to industries of destruction, such as bomb factories and air-polluting power plants.

The Army Corps of Engineers study estimates that the Cape wind farm would create 391 full-time jobs and lower the cost of health problems associated with power-plant emissions.

Sen. Kennedy's and Gov. Romney's opposition is on aesthetic grounds. They simply don't want the turbines to be built in Nantucket Sound, where they will become part of the view for some people on the Cape and Islands.

Aesthetics is a real issue, although there are many who believe the turbines could be a thing of beauty and inspiration. But the benefits of this project so far outweigh aesthetic concern that it is time for these two political leaders to take a fresh look at the project and consider the long-term good for New England. New England will be a proud pioneer of wind energy when this nation and this region need clean power with no Middle Eastern strings attached.

SECOND FRONT

THE STANDARD-TIMES
NEW BEDFORD, MA

Task force chairwoman gives support to wind farm

By DAVID KIBBE
Standard-Times staff writer

BOSTON — Susan Tierney, chairwoman of a task force that recommended the state regulate ocean development last March, has written an impassioned letter to the U.S. Army Corps of Engineers in support of the Nantucket Sound wind farm.

Ms. Tierney, who works as a private consultant in the energy and natural gas industry, has a long record in energy and environmental issues. She served as secretary of Environmental Affairs under former Gov. William F. Weld, and was commissioner of the Department of Public Utilities under former Gov. Michael S. Dukakis. She was also an assistant secretary for policy at the U.S. Department of Energy during the Clinton administration.

In a Dec. 16 letter, Ms. Tierney said she was undecided on the project until the Army Corps re-

leased a draft environmental report in November. Without making a final decision, the Corps found the wind farm offered environmental and economic benefits without substantial adverse impacts.

"In this case, I believe that this project will produce significant benefits ... by providing all of us with a supply of electricity that produces no greenhouse gas emissions," Ms. Tierney wrote, emphasizing that her comments were personal, and not on behalf of the task force.

"I think this is an important and positive and public use of the important wind resources that are located here in Massachusetts, in Nantucket Sound. This is an investment for our children."

The corps is accepting written comments on the draft report before issuing a final decision on the wind farm, which is expected by next summer.

Ms. Tierney, of Newton, was appointed chairwoman of the volunteer Massachusetts Ocean Management Task Force in June 2003 by Gov. Mitt Romney's environmental affairs secretary, Ellen Roy Herzfelder. The task force did not issue an opinion on the Cape Wind project, which would be in federal waters, beyond the state's jurisdiction. The task force rejected calls for a moratorium on wind farms in state waters.

"I served with (Ms. Tierney). I admire her," said Sen. Robert O'Leary, D-Barnstable, who was a member of the ocean task force and who opposes the wind farm. "I frankly disagree with her on this."

Ms. Tierney is another high-profile Romney appointee who favors the wind farm despite the governor's repeated public opposition to the project. Gov. Romney's Secretary of Commonwealth Development Douglas

Foy is another supporter.

Attorney General Thomas F. Reilly, who also opposes the wind farm, has acknowledged there are differences of opinion in his office as well. But both Gov. Romney's and Mr. Reilly's offices insisted yesterday that they are steadfast in opposition to the proposal by Cape Wind Associates to build 130 wind turbines in Nantucket Sound.

Romney spokesman Felix Browne said the governor has been "consistent" in his opposition.

"Members of the Ocean Management Task Force were not selected for their views on the Cape Wind project, but rather for their expertise in ocean management issues," Mr. Browne said, adding that Ms. Tierney "had a lot of credibility."

Mr. Reilly is seen as a potential challenger to Gov. Romney in 2006. Both of them spoke in op-

position to the wind farm at a public hearing in Yarmouth last month.

"As is the case when issues come before our office, there is extensive internal debate, but at the point where a decision is made, that is the decision of the office, and we stand rock-solid behind it," said Reilly spokeswoman Sarah Nathan. So far, people who have been watching the issue closely say they have not seen mixed messages coming out of either office.

"I would say I've talked to people within the administration at various levels who have very strong opinions contrary to the governor's," Sen. O'Leary said. "I think they are working hard to keep those opinions under wraps, frankly. I don't see any effort by the Romney administration to send mixed signals."

Reached yesterday, Ms. Tierney said Gov. Romney had not tried to influence her on the wind farm.

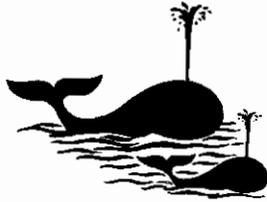
"I am aware of his opposition," she said. "The assignment that we got at the task force was to use our best judgment and try to come up with some recommendation with how to manage the ocean resource. The secretary of environmental affairs really encouraged us to try to find a workable solution."

Ms. Tierney said she was concerned about the nation's escalating energy use and the threat of global warming from greenhouse gases.

Ms. Tierney's support was appreciated by Cape Wind President James Gordon.

"It was one of the most thoughtful and insightful letters I've seen on this project and on the debate to date," he said. "She is one of the most respected thinkers in terms of energy and environmental policy."

Feb 22, 2005



Near Abuel Koning, 004149

Nantucket Sound

beckons people from all over the world for its scenic beauty and unspoiled sound and sea. Boat races and other sports would be visually and physically unpleasant and perhaps dangerous even to the ferries.

The issue of who owns the ocean (the federal govt.) is

also upsetting. Let the national legislature determine if this "water grab" is legal.

It's already have confused whales throwing themselves upon our beaches. Imagine what their internal radar would make of this.

Please give the fed. govt. a chance to set ocean policy before proceeding. Sincerely, Gale Arnold

benefits from this grab
at public land is the
power company.

Sincerely,

Ypiter Terripseed

115 Seabrick Road

Syracuse, NY 13203

2/20/2005

Dear Colonel Koning,

I am writing to express
my dismay at the prospect
of nine string windmills
in the middle of Henseshore
Sutcliffe in Nantucket Sound.
The very idea that a
miniscule percentage of
energy production is worth
disrupting and despoiling
Nantucket Sound is
alarmsome. In my opinion
the only entity who truly

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FEB 23 2005

U.S. DEPARTMENT OF THE INTERIOR

004149

February 19, 2005

Karen Kirk Adams
Cape Wind Energy Project EIS Manager
U.S. Army Corps of Engineers, New England District
696 Virginia Rd.
Concord, MA 01742-2751

004150

Re: Cape Wind Associates permit application

Dear Ms. Adams,

I am submitting these comments as a resident of Martha's Vineyard in Edgartown, Massachusetts. In addition to being a resident of the area to be impacted by this project, I am a former program manager in the state of Connecticut where my responsibilities dealt with permitting sources of air pollution (including the energy generation sector), waste management, hazardous waste treatment and disposal facilities, and a variety of solid waste and medical waste treatment and transfer projects. I performed these tasks, as well as enforcement responsibilities, for over 30 years and am therefore familiar with the permitting and public participation process.

The final permit decision will no doubt include many additional comments from both individuals as well as government experts in their respective fields. From a public policy perspective, it is my opinion that the U.S. Army Corps of Engineers has not been provided with a valid application in that the applicant does not have jurisdiction over the lands which it intends to utilize for its' activities. The recent federal court decision regarding the extension of the Barnstable shoreline into an area which the applicant claims for its project clearly establishes this point and should be grounds for rejection of the application. In an overall sense, the best possible decision by the Corps regarding the applicants right to utilize this site should recognize that a jurisdictional loophole has inadvertently been created. Sound public policy would again suggest that the application be denied or deemed incomplete until resolution of the proper federal or state jurisdiction over Nantucket Sound is established. This oversight in applicable law has placed the Corps in the position of being forced to regulate certain activities over which it has no jurisdiction.

The mechanism for establishing a closure surety seems exceedingly generous as pertains to the amount of time the applicant would be allowed before fully funding the closure costs. A project of this magnitude, regardless of the revenue generating potential, should be more fully funded up front even prior to any construction. The applicant did not present proper justification to make a case for any financial test demonstrating the ability to perform closure independent of this project and accordingly should be required to document the ability to fund closure activities at the one hundred percent level at any time during the life of the project. The timing for the establishment of closure funds should not be established as a function of the completed project but rather as the real costs at any stage of construction. Some of the most costly closure and clean-up activities will be occurring during the earlier stages of construction and these should be fully funded prior to commencement of construction. Comparable standards are established by the closure funding requirements in Federal law (sorry but I don't have access to the CFR cites) governing Hazardous Waste facilities and Municipal waste landfills.

Although not necessarily within the jurisdiction of the Corp's decision, the proposed decision made reference to the improvements in air quality due to the lack of emissions from this project. To the extent that these issues are considered in the final decision, any offsets from pollutants generated by local power plants should not be considered unless an enforceable and binding agreement is provided by the applicant demonstrating that they will in fact accomplish a net reduction in emissions. Notwithstanding the above, any reductions in air pollutants due to this project which are not real (i.e. not "paper reductions") and not realized locally should not be considered.

My final personal observation concerns the projects impact on wildlife, birds in particular. As noted by Ms. Robin Bray at the public hearing in Oak Bluffs, the project will have an impact on an area which is heavily utilized as a flyway by migrating birds. I have also observed this phenomenon in the fall as tens of thousands of birds travel right through Nantucket Sound every morning during the fall migration. The draft EIS did not address this matter but instead used mortality estimates based on "comparable" land-based activities. Additional studies or expert government testimony is needed to more fully address this issues.

My remaining comments will serve to highlight and repeat some of the remarks made at the above referenced hearing. Neither the applicant nor the Corps presented any site specific discussion addressing the aesthetic and economic impacts of the visual pollution which this project would cause. This was left primarily, and improperly, to the public resulting in one of the more emotional issues of this entire proceeding. If the only testimony for this issue is from comparable activities in Denmark then the applicant should be found to have failed to demonstrate that the public will not be adversely impacted on this aspect of the proposed project. Similarly, and of much greater concern, neither the applicant nor the Corps addressed the concerns and expert

testimony of a variety of recreational and commercial boaters and professionals. One of the greatest concerns for this entire project was voiced by one of the captains for the Steamship Authority who deemed the project a threat to navigation. If the Corps grants this permit it must provide that all hazards and threats to navigation testified to by these individuals are fully and safely addressed.

Thank you for providing me with the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "David A. Nash". The signature is written in black ink and is positioned below the word "Sincerely,".

David A. Nash
35 Deacon Vincent Way
P.O. Box 3254
Edgartown, MA 02539

Karen Kirk Adams
Cape Wind Energy Project
EIS Project Manager
Army Corps of Engineers
New England District
696 Virginia Rd.
Concord, MA 01742-2751
wind.energy@usace.army.mil

Thursday, February 24, 2005

00415E

RECEIVED
FEB 24 2005
U.S. ARMY CORPS OF ENGINEERS
NEW ENGLAND DISTRICT
CONCORD, MA

Dear Ms Adams and USACE:

I am writing to comment on the Draft Environmental Impact Statement (DEIS) you have prepared for the Cape Wind Energy Project. I commend the USACE for the effort it has put in to examining the potential benefits and impacts of the project so far. New England urgently needs to develop energy sources that do not depend on fossil fuels, and which produce less pollution. Wind energy should play a prominent role in this, and the Cape Wind Project has enormous potential.

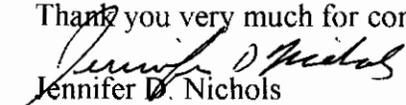
In the revised EIS, I request that the USACE include a serious comparison of the preferred alternative at Horseshoe Shoals (HSS) with the alternative South of Nantucket (STI) in terms of risks to flying birds. The STI site is outside of Nantucket Sound, and the sound is a major thoroughfare for seabirds flying to and from the shores of the Cape and Islands.

Wind turbines generally have a very low environmental impact when sited properly. However, they can have unacceptable impacts when placed in areas where there is high use by birds and bats. The preferred alternative site, on Horseshoe Shoals (HSS), is in the middle of Nantucket Sound, surrounded by the shorelines of Cape Cod, Nantucket, Martha's Vineyard and other smaller island and shoals. All of these are destinations for birds and the sound itself is used as a feeding and resting area for many birds. Thus, the HSS site is in an area where one expects considerable bird traffic, raising my concern about the suitability of this site compared to other alternatives.

In the DEIS, several alternative sites are considered. However, the information presented does not allow a quantitative comparison of the flying bird traffic among these sites. This is particularly important since Nantucket Sound is used by all of North America's endangered roseate terns, and this population could be driven extinct if the wind turbines were sited incorrectly. This would be a disaster for these birds and for the future of off-shore wind in the region.

An examination of Figure 3-20 of the DEIS shows three alternatives within Nantucket Sound proper. Even casual consideration of the bird uses, and geography, of this area should raise concerns about the potential for bird collisions in this area. However, the *South of Tuckernuck Island Alternative* (STI) is outside of the sound and appears to be a site where the rate of transiting by roseate terns and other seabirds may be considerably less. It is also further from the mainland, so migrating birds are more likely to be flying higher as they pass this site. In the preparation of the EIS, I strongly urge you to include a careful comparison of the STI site with the HSS site, allowing a solid assessment of bird traffic through the planned rotor areas of the project. Serious consideration should be given to siting the wind project at the STI alternative.

Thank you very much for considering my concerns,


Jennifer D. Nichols
25 Three Ponds Road
Wayland, MA 01778

Cape Wind Farm

It's a great idea to have a form of energy that does not pollute the earth.

It will also be good for the marine life because it will be like sinking a vessel as an artificial reef.

Rose Sullivan

004152

RECEIVED
FEB 15 2008
FISHERY DIVISION

Robert R. Jones
65 Pinewood Road
Hyannis, MA 02601
508-775-6002
ccmarinegp@comcast.net

004153

February 15, 2005

Colonel Thomas Koning
Army Corps of Engineers
New England District
696 Virginia Road
Concord, MA 01742

RECEIVED
FEB 16 2005
U.S. ARMY CORPS OF ENGINEERS
NEW ENGLAND DISTRICT
CONCORD, MA

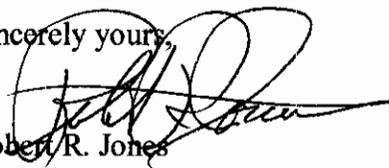
RE: Navigation Report Cape Wind: Section 5.0 DEIS 2005.

Dear Col. Koning:

My name is Robert R. Jones. I am a native of Cape Cod and have worked and sailed on the waters of Nantucket Sound all of my life. I am in the marine industry and sell offshore sportfishing boats up to sixty-five feet in length. Within the Town of Barnstable, I am a former town councilor and former chairman of the town's waterways committee, which I chaired for over ten years. Presently I sit as Chairman of the Port Council of the Woods Hole, Martha's Vineyard and Nantucket Steamship Authority.

I am writing to express my strong opposition to the proposed offshore wind generating project in Nantucket Sound, and to provide comment upon the Draft Environmental Impact Statement (DEIS) as provide by the project's applicant, Cape Wind, Inc. I find the document to be totally inconclusive, lacking in depth, and flawed. In almost every instance, the DEIS fails to deliver a true and conclusive analysis of most every subject that it addresses. The report denies every threat to the environment, every threat to the aesthetic beauty of Nantucket Sound, every impact upon the fisherman, property values, the avian community, the benthos community as well as impacts upon navigation and aviation. In every instance where obvious impacts exist, the DEIS resorts to rhetoric to cover any admission of impact to the environment or to the users of Nantucket Sound.

The only thing I find conclusive within the report is that it is inconclusive. Most importantly, it fails to prove that an "overwhelming public good" will be served by this project. It also fails to prove that the individual and cumulative impacts of this project will not lead to the ruination of Nantucket Sound. Nantucket Sound has far greater value in its natural state than to be traded for an industrial complex. A far greater public good will be served to protect this body water as a marine sanctuary rather than to destroy it. Seventy percent of the earth's surface is covered with water. It would be a little presumptuous to think that there is no other location on land or sea for this project. Please deny this application and instruct the applicant to find a more compatible site for this project. Your denial will perform a great service to protect the ecosystem of Nantucket Sound and ensure its preservation for our children and for our children's children.

Sincerely yours,

Robert R. Jones

Attachment: Comments on Section 5.12, Transportation and Navigation
CC: Cape Cod Commission

ATTACHMENT

RRJ/Col Koning

February 15, 2005

Re: Transportation and Navigation Section 5.12

Please except my comments on section 5.12, Transportation and Navigation of the navigational report of the DEIS. While I have numerous questions and comments concerning the conclusiveness of the entire DEIS, I feel most qualified to address the deception created within the navigational report that the presence of 130 giant WGTs, hundreds of miles of cabling and switching platforms will not create a hazard to navigation. My comments and questions will be targeted to individual misconceptions or erroneous statements craftily scripted and edited by the applicant in an attempt to minimize and distort the true impacts upon safe vessel navigation.

Comments:

5.12.3.1 Marine “The area between the Main Channel and the Cape Cod shoreline, including Horseshoe Shoal, is designated as an anchorage ground, known as “Anchorage I.” Floats or buoys for marking anchors or moorings in place are allowed in this area. Fixed mooring piles or stakes are prohibited (NOAA, 1994).”

If fixed mooring piles or stakes are prohibited in this area, by what authority does the Army Corps have to issue a permit for WTG’s within this restricted area? As Congress is the only authority who can grant a certificate of non-navigability beyond the harbor limits and beyond the jurisdictional limits of the Army Corps, how is this project exempted from securing the same?

Paragraph 5 “....Steamship Authority vessels do not transit over Horseshoe Shoals....”

The Steamship Authority vessels, and also the Hy-line vessels do in fact transit within the footprint of the proposed wind generators, as provided by testimony from both ferry services. While under normal sea conditions, the ferries navigate within the marked channels, under certain high wind conditions, they are forced to tack within this area for the safety and comfort of their passengers and for the safety of their cargo. Cape Wind successfully uses the term Horseshoe Shoals as being inclusive of the entire footprint of their proposed generating facility, and eludes that this area is non-navigable. Your review must recognize that Cape Wind wishes all to believe that the Horseshoe Shoals, which is only one section of this project, is too shoal for navigation. This simply is not the case. The sound is used by thousands of recreational and commercial boats.

Paragraph 6: (Sea Ice) “There do not appear to be historical records on the frequency of sea ice events in Nantucket Sound....”

There are numerous accountings of sea ice within Nantucket Sound, both historic and within the last few years. Even a simple query to our local newspapers would verify this. Ice within the sound is a serious inhibitor to the safe winter navigation of the island ferries.

5.12.4.1.1 Marine:

Planned Configuration Paragraph 2....(Bottom Scour) “.....However, this localized scour will be mitigated as described in Section 5.2.5, and is not expected to produce any large-scale changes in bathymetry or shoaling of shipping channels outside the project.”

The phrase “... and is not expected to produce any large-scale changes....” is not an acceptable finding within this report. It shows a complete lack of effort and study performed by the applicant. These equivocal statements are laced throughout the report and the applicant must be challenged to render accurate and unequivocal finding within this report. Bottom scouring will exist within these areas as currents and eddies excited by two and three knot currents and bolstered by high winds and severe weather conditions, will create sand waves and shoaling not only around the towers, but quite possibly alter the whole sea flow creating shoaling within navigational channels. The sand waves and undulation have a great potential to expose the subsurface electric cables. Six foot cable depths may mean nothing within this area.

Ice “....Localized rafting of sea ice around individual WTG may occur if weather conditions permit.....”

What guarantees does Cape Wind put forward to ensure that the WTGs will not create ice dams within the Sound and render the sound impassable? Will the Army Corps require the applicant to keep the main channels open in the vicinity of the towers where ice flows have dammed up and have created navigational hazards within the channel area?

Paragraph 2: (Icing of rotor blades) “.... Ice may collect on the WTG structure and blades under certain meteorological conditions...”

In Europe, it is a known fact that large chunks of ice have been thrown from the blade tips at a rate of speed in excess of two hundred miles per hour. Chunks of ice hurled across the Sound at this velocity has the potential of traveling several hundred feet in the air. Passing vessels will be in severe danger. The Steamship Authority in 2003 made 15,598 trips from the mainland to Martha’s Vineyard, with runs both summer and winter. That same year, the SSA made 8,880 trips from the mainland to Nantucket, with runs both summer and winter. It is also known that other ferry serves, commercial vessels, and fisherman regularly traverse Nantucket Sound in the winter months. The icing of the rotor blades and the potential of throwing huge chunks of ice is a serious danger to winter boaters and the issue must be addressed. The supposition that “Ice may collect” must be discarded and replace by mitigating measures which will ensure that this danger is eliminated. The verbiage within this report will not insure the safety of vessels passing within this area when icing exists.

Proposed Aids-to-Navigation: Paragraph 4 (GPS) “....even GPS antennas located next to a WTG should not experience degraded GPS information as a result of not acquiring sufficient satellite signals...”

The applicant purports to have conducted field tests to prove the data herein, why is it inconclusively stated that a GPS “should not experience degraded GPS information” Why is it not factually and conclusively stated? Accurate GPS readings are essential to navigation, especially during hazardous weather conditions of high winds, fog and the like. If a GPS and other navigational instruments are degraded due to screening from the WTGs, it will clearly be a hazard to navigation. The accuracy of navigational instruments is essential to safe navigation. The applicant must prove conclusively that this project will not effect the instruments in any way.

Collision Risk: Paragraph 1 (Tower Diameter Shielding) “...The small diameter of the WTGs would prevent all but the smallest vessels (those with LOA of approximately 16-18) from being shielded from view of another vessel by a WTG...”

This is nonsense! The closer a vessel is to the tower the larger the screening area the tower presents to the viewer. This screening is not restricted to small vessels, it applies to all vessels. Tower screening may easily contribute to a collision when an approaching vessel is converging on a bearing directly behind the tower screen. Do not think that there will only be but one single boat in the Sound at the same time. More than likely, there will be scores of boats within the vicinity at the same time, each running a slalom course through the towers. Statements like these continue to show the lack of insight the applicant has of navigational issues, and how they fail to take any responsibility to create an honest assessment of the hazards which will be created within the sound.

Also Paragraph 1 (Blade height from water) “...When the WTG blade is in lowest position, it would be approximately 75 feet above the water surface...”

When a sailing vessel is passing a WTG, the prop wash from the rotor blades has a great potential to deflect the prevailing upwind and turn the wind's backwash into a different quadrant. This can create an extremely dangerous situation which has the potential to cause a sailing vessel to broach or jibe. On smaller vessels, it even has the potential to cause a vessel to capsize. It is assumed that the applicant would accept the liability of such an occurrence.

Paragraph 2. (Drifting vessels) “....A drifting vessel, if it were to collide with a WTG, would likely receive some level of structural damage, but would remain afloat....”

How can the applicant qualify this statement and conclusively guarantee that the collision of a drifting vessel would remain afloat. How can the applicant conclusively guaranteed that the tower will not collapse? The hydraulics of a moving current pinning a smaller vessel to a tower could in fact create a situation where a smaller vessel may take on water and be swamped. Unlikely? Yes? Impossible? No. How can this report accept conjecture as fact.

Search and Rescue: Paragraph 2 (SAR OperationS) “The Wind Park is not anticipated to have negative effects on SAR operations in the area of Horseshoe Shoal....”

SARs may be more frequent during daylight hours as previously stated within the report, but it must also be concluded that SARs occur mostly during adverse and hazardous weather conditions such as wind, fog, rain, snow, and even darkness. It is incomprehensible to think that these towers would not hinder a rescue mission, especially by air. Even under the most favorable weather conditions, the closer the SAR is to the towers, the greater the risk. Can any credible report conclude to the contrary?

“...Each WTG would have a safety line with a loop at the end from the platform to the water..”

How will a vessel drifting in a two to three knot current secure a line if there is but a single line is attached up current? It is assumed that a requirement will be dictated to place a line on each quarter.

Submarine Cable System:

Fifth bullet 1st Paragraph (Fishing / Anchoring over Cables) “ The submarine cable system and inner-array cables would not preclude, prevent, or disrupt commercial and recreational fishing, since the cables would be buried at a minimum of 6 feet below the seabed....”

It has been concluded within this report that bottom scour will happen, the extent of which has not been proven by the applicant. Accepting that fact, how can the applicant guaranteed that these cables will not be exposed or rise to the surface due to the currents, eddies, swirls and wave action which create sand waves and bottom scour? The potential for this to happen is great. How will the cable depths be monitored, and will the applicant guarantee that these cable depths will remain fully submerged at a 6 foot depth to allow vessels full and safe use of the Sound? Will the applicant guarantee that the area will remain safe for surface boating, safe for subsurface fishing, and safe for anchoring within the seabed? How will the applicant insure this?

Navigation Rules:

Paragraph 1 (COLREGS) “In preparing this assessment of potential impact to navigation, it was assumed that all mariners would adhere to the COLREGS, as required, and would operate their vessels in a safe and prudent manner....”

It is a naive assumption that all mariners have a working knowledge of the 1972 COLREGS and would adhere to these rules. To the contrary, it can only be assumed that all commercial mariners must have a working knowledge of these regulations, but it can not be assumed that recreational boaters are knowledgeable of the '72 COLREGS, because most do not have any knowledge at all of these regulations. The applicant must not be allowed to wash its hands of their responsibility of placing 130 hazards to navigation within Nantucket Sound. It feel safe in concluding that collisions and accidents will occur within complex whether the navigator knows the 1972 COLREGS or not. It is not a question of if, but of when.

Without attempting to be facetious, would the 1972 COLREGS have prevented the collision of the Andrea Doria and the Stockholm? Does the possession of a drivers license keep automobiles from hitting telephone poles?

Accidents will happen on land and sea. One hundred and thirty WGTs and a switching station will not make the Nantucket Sound a safer place to boat. There is no way that the applicant can soft-peddle the impact created by these structures. The job of the Army Corps is to insure that any structure placed in a navigable waterway will not create a navigational hazard. This project should not be permitted is such a popular boating area.

From the Executive Summary:

Within the Executive Summary, it was stated that navigation within the footprint of the WTGs will not interfere with the usual and regular use of the Sound. What assurances do we have that the Horseshoe Shoals and adjoining waters will not be closed to the boating public by the USCG due to the incompatibility of vessels to safely navigate within this area? What assurances do we have that Homeland Security will not deem the 24 square miles of towers, cabling and switching platform vulnerable to attack and must be posted and closed to the boating public?

The navigational issues surrounding this project are but one of a myriad of issues which singularly and cumulatively create a serious strain and impact upon the waters of Nantucket Sound. The public interest is not being served by ruining Nantucket Sound and trading this pristine marine sanctuary for an industrial complex. The permit for the use of Nantucket Sound for this project must be denied.

Comment Sheet
On Draft Environmental Impact Statement (EIS)
For the proposal for an Offshore Wind Project
In Nantucket Sound

004154

Name: Jo Ann Archer

Address: Tracey Road Cotuit, MA 02636

Phone Number (Please include area code): (508) 221-7730

Email Address: _____

Please state your questions/comments in the space below:

The end does not justify the means. The amount of electricity produced by the proposed Wind Mill Factory does not justify the destruction of our sound. None of the data compiled on the benefits to Cape Cod are significant, especially since the electricity produced will go into the Grid and it will never be used by Cape Codders. It is a no win situation for Cape Cod the only winner is Cape Wind. Large numbers of our wildlife will be killed along with the destruction of numerous fishing beds and this is unacceptable and horrible. But the awful effect on human life has been largely ignored and it must be addressed. Our Sound is also a place for recreation and Cape Cod is mainly a resort. Vacationers come here to relax and enjoy the beauty of our sound, its beaches and nature. Destroy the Cape's beauty by erecting a Wind Mill Factory and the image of Cape Cod will be destroyed forever and ultimately the Cape Cod economy. Vacationers are the life blood of Cape Cod and we will hemorrhage to death if the Wind Mill Factory is erected in Nantucket Sound. Furthermore if the W.M.F. is built in our sound and a major hurricane occurs we will be faced with the added threat of mass destruction from the propeller blades of the Wind Mills. These projectiles can cause catastrophic damage to anything in their path. Add to that the oil spill of 40,000 gallons and our beaches will be destroyed. The sound should be preserved as it is for our children and future generations.

Please fold this questionnaire in half, affix two stickers or pieces of tape,

and mail it to the address listed on the other side.

To enjoy. It is God's gift to us and it must not be destroyed by man.
May God Bless and Protect Cape Cod and Nantucket Sound,

Feb 23, 2005

004155

Dear Colonel Koring,

Saving our sound is very important to me for many reasons. As a resident of Chappaquiddick we value our beautiful vistas and clean water. We moved here because of the unspoiled area & views and there are thousands of visitors who come for a taste of nature unspoiled. How sad to think this could be spoiled for us all. Do you realize how beautiful it is here and that it is truly one of the last great unspoiled areas? We are talking about industrialization of this area.

I am also concerned about the navigation safety. As a boater I know how quickly fog rolls in making it difficult to see. If there were towers out there it would be a problem during fog or storms.

The other concern is for the wildlife. Since this is a stopping place for migrating birds, thousands would be killed going back & forth. I have heard this to be true in areas where they have wind towers.

The pollution would affect our fish & shellfish as well. We are so fortunate to have clean fish now.

I feel that this is not the answer to our oil problem. The real answer is conservation. If we drove more efficient cars - not SUVs but like our Volvo getting 28mpg all we all so selfish we need more & more usage - how about better conservation education. Keeping fewer lights on in buildings & homes etc.

2109 Forest Hill Road
Alexandria, VA 22307

February 16, 2005

Colonel Thomas Koning
New England District Office
696 Virginia Road
Concord, MA 01742-2751

004156

RECEIVED
FEB 16 2005
U.S. ARMY CORPS OF ENGINEERS
NEW ENGLAND DISTRICT OFFICE
CONCORD, MA

Re: Permit for Cape Wind Project

Dear Colonel Koning:

I am writing to oppose the permit for the Cape Wind project and object to the draft EIS. This project is contrary to the public interest. The claimed benefits of the project are overstated, and may very well be nonexistent. Certainly, neither the Corps of Engineers nor the power company developer has proven the case that the benefits are real. It is most inappropriate to consider this application on such a weak basis. In addition, the DEIS does not look at a wide range of alternatives. Many smaller sites that are still economical have been overlooked, while other large scale offshore sites are ignored simply because they are not where this applicant wants to build. This is not a valid basis for decision-making.

While the benefits are unproven, or at least insignificant, the project's adverse effects are overwhelming. This project will destroy Nantucket Sound, not just for its scenic values, but also on environmental, aesthetic and historical grounds.

Finally, I am appalled that the Corps is even considering giving away the public property of Nantucket Sound to a private developer on nothing more than a navigation permit. This would appear to be illegal, and certainly improper from a public policy perspective.

John A. Jenkins
3109 Garfield Street NW
Washington, DC 20008

004157

February 23, 2005

Colonel Thomas Koning
U.S. Army Corps of Engineers
696 Virginia Rd.
Concord, MA 01742

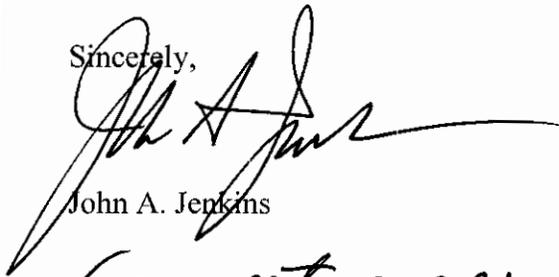
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FEB 23 2005
U.S. ARMY CORPS OF ENGINEERS
CONCORD, MA

Dear Colonel Koning:

I am writing this letter to have my voice heard regarding the Cape Wind Draft Environmental Impact Statement. I find this statement inadequate in many areas, including: air and boat navigation safety, impacts to birds and other wildlife, pollution threats from oil on the transformer substation, visual pollution and associated economic and tourism impacts, and the analysis of alternative sites.

Save Our Sound!

Sincerely,



John A. Jenkins

*(property owner in Eastham, MA at
275 Pinewood Road, 02642)*

Lucinda C. Sheldon

JEWELER ♦ ENAMELIST

004158 Feb 22

Dear Colonel Koning -

I am one of many residents
of Martha's Vineyard that is
very concerned about the
impact of a potential wind
farm in Nantucket Sound.

I am very much opposed
to this plan. I feel the
impact on wild life, air & boat
navigation, and marine life
could be enormous.

Please reconsider -

Yours truly,

Lucinda Sheldon

SEARCHED
SERIALIZED
INDEXED

Alan O. Wilson

~~HBM Corporation, 11 South Broadway, White Plains, New York 10601~~

004159

16 Green Pastures Road
CHAPPAQUIDDICK, EDGARTOWN, MA. 02539

Feb 23, 2005

Dear Colonel Koning

My background is as a graduate Civil Engineer from Rutgers. I feel that wind energy as a source of power is not necessary at this time. There are ~~so~~ so many other ways to conserve energy that are not being exercised and should be, before we destroy what is an important ecological area of the COAST.

Last night on TV - Engineering Mistakes, they showed the Texas Tower off MASS. that collapsed in the 1960's during a storm of 50 MPH. We get winds of up to 80 MPH on Chappaquiddick & the possibility of the wind turbines failing is high.

Please allow for a adequate study to take place before making a decision.

Alan O. Wilson

P.S. I hear that the wind farm off Denmark is failing, too.

004160

DAN HAMILTON, JR.

February 22, 2005

Colonel Thomas Koning
U.S. Army Corps of Engineers
696 Virginia Road
Concord, MA 01742

Dear Sir,

As a way of introduction, my husband, Daniel H. Hamilton, retired from M.I.T. Lincoln Laboratory in 1984 after 35 years at the Institute. He has summered on Cape Cod for 87 years even keeping meticulous tide records since he was a child. We have a house in the Village of Centerville overlooking Nantucket Sound, and the Centerville River.

We are totally in opposition to the proposed wind farm in Nantucket Sound. The windmills will not only impact the migratory bird flights in the fall and spring but will be a hazard to navigation (particularly small pleasure boats), and will be visually offensive to the lovely and pristine Sound.

We hope that you will do everything in your power to halt this proposed project.

Yours sincerely,



Mrs. Daniel H. Hamilton, Jr.

RECEIVED

FEB 25 2005

10:00 AM

Elisabeth Andresen Massey
249 Marlborough Street
Boston, Massachusetts 02116

Dear Mr. Koning,

004161

Please reconsider the environmental impact statement for Cape Wind. What about air + boat navigation safety, impact to birds + other wild life, oil pollution + the analysis of alternative sites.

This is extremely important — it is our sound. Elisabeth A. Massey

First National Corporation

A Registered Investment Advisor

1001 Hingham Street
Rockland, MA 02370
(781) 878-7757
Fax (781) 878-9894

Charles P. Peck, CLU, LIA

February 24, 2005

Colonel Thomas Koning
U.S. Army Corps of Engineers
696 Virginia Road
Concord, MA 01742

004162
FEB 24 2005

Dear Colonel Thomas Koning:

I am writing on behalf of my wife and myself to let you know how strongly we feel about saving Nantucket Sound from the proposed windmill project.

After carefully reading the "Environmental Impact Statement" we have concluded that it is an incomplete report, because it does not adequately address several critical areas including:

- Navigational safety for amphibious and air craft
- The deleterious effect on birds and other wildlife species
- Potentially devastating oil pollution threats from the transformer substation.
- Associated tourism and economics impact
- A more comprehensive analysis of alternative sites.

When one thoroughly analyzes the projected benefits of the proposed windmill farm in terms of energy production and cost savings attributed to "cheap electricity" measured against the collective potential economic losses and serious environmental hazards it would appear that there is an easy decision to make.

Allowing monetary profits to accrue to a small group at the expense of and detriment to the populace at large would be an egregious social mistake. We cannot afford the losses, which will be fiscal, emotional, and would remain forever in perpetuity.

Sincerely,



Charles P. Peck

To Colonel Thomas Koning, US Army Corps of Engineers.

Please do not desecrate
a National Treasure.
Nantucket Sound is a
National Treasure. Please
do not be short sighted!

Sincerely,

Greg Dempsey
617-429-9433

P.S. the study is inadequate re: wildlife,
boat navigation safety, pollution & tourist impact!

004163

RECEIVED

SEP 2 2015

U.S. ARMY CORPS OF ENGINEERS

1415 Glenhaven Ave.
East Lansing, MI 48823

February 20, 2005

004164

Colonel Thomas Koning
U.S. Army Corps of Engineers
696 Virginia Rd.
Concord, MA 01742

Dear Colonel Koning:

I am a homeowner in Falmouth, MA, and I am writing to advise you that I find the Cape Wind Draft Environmental Impact Statement to be utterly inadequate. The Draft EIS gives only superficial consideration to the effects of the project on Nantucket Sound's wildlife and long-term tourism potential, and it gives entirely inadequate attention to alternative sites.

Sincerely yours,



Richard W. Hill

RECEIVED

FEB 23 2005

CONCORD, MA

Dear Army Corps

004165

The Cape Wind Draft
to inadequate include
air & boat navigation
safety, it impacts
bird & other wildlife
pollution threats from
oil on the transformer
substation visual
pollution and associated
economic tourism
impacts and the
analysis of alternative
sites.

Sincerely Ted Johnson

SAVE OUR SOUND
alliance to protect nantucket sound

Dear Friend of Nantucket Sound:

Is this what we want Nantucket Sound to look like? **It** is time to speak up and make your voice heard. Please take five minutes to write to the Army Corps **before** Feb. 24, 2005 to tell them that the Cape Wind Draft Environmental Impact Statement is **inadequate** in many areas, including: **air and boat navigation safety, impacts to birds and other wildlife, pollution threats from oil on the transformer substation, visual pollution and associated economic and tourism impacts, and the analysis of alternative sites.**

Write to: Colonel Thomas Koning, U.S. Army Corps of Engineers, 696 Virginia Rd, Concord, MA 01742. See www.saveoursound.org for more on how you can help.

Thank you,

Alliance to Protect Nantucket Sound



RECEIVED
FEB 23 2005



004168
COLONEL THOMAS KONING
U.S. ARMY CORPS OF ENGINEERS
696 VIRGINIA RD.
CONCORD, MA 01742

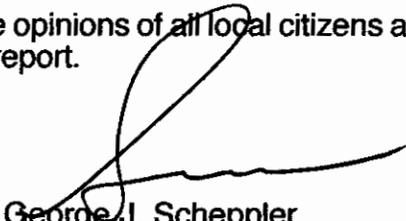
BOATING & FISHING: We will let others, much better qualified than we, address this issue in depth. But as lifelong sailors in Nantucket Sound waters, we can only imagine the disastrous possibilities that such a project would present for boaters, fishermen, and aviators.

Please do not allow the construction of a power plant in Nantucket Sound unless all other options have been exhausted.

We hope that our opinions, and the opinions of all local citizens and taxpayers, will be included in and considered in your report.

Respectfully,

Dianne M. Muller


George J. Scheppler

cc: Senator Edward Kennedy
Senator John Kerry
Rep. William Delahunt
Cape Cod Times

004167

RECEIVED

APR 18 1993

U.S. DEPARTMENT OF THE INTERIOR

Mimi Davisson
P.O. Box 3424
Oak Bluffs, MA 02557

004163

February 22, 2005

Ms. Karen Adams, Project Manager
Regulatory Division, Army Corps of Engineers
696 Virginia Road
Concord, MA 01742

Dear Ms. Adams;

Thank you for the opportunity to comment on the Cape Wind proposal to construct a windfarm in Nantucket Sound.

I urge the Army Corps of Engineers to deny this windfarm project for several reasons:

1. There is no public policy in place to guide the implementation of domestic renewable energy projects. This is a serious shortcoming. Without such a policy, any action on this project could set inadvertent, inappropriate precedents for the future.
2. There are no immediate benefits to the communities that surround this project. The project will not have a positive impact on air quality because the proposal has no provision for shutting down polluting fossil fuel plants in the area. There will be virtually no reduction in energy costs to local consumers because current electricity pricing practices will mask the effect of any lower costs for generating electricity. Windfall profits will go to a private company using a public resource, not to public consumers.
3. Placement of such a project in the middle of a densely populated recreational area is short-sighted. As the country's population grows, availability of recreational areas in densely populated areas will become more essential than ever. This is not the time to despoil a recreation area that is easily accessible by so many people.
4. The use of a popular public recreational area for a for-profit private project is especially troubling.

As I am sure you understand quite well, the Army Corps of Engineers, a technical organization, is being asked to make a political decision. I urge the Corps to deny this windfarm proposal and to refer the issue to federal and state legislative bodies to mandate development of a comprehensive renewable energy policy.

Thank you for considering my comments.



February 22, 2005, Letter to Army Corps of Engineers
Re: Proposed Windfarm for Nantucket Sound

Copies to:

United States Officials

Senator Edward Kennedy, Massachusetts
Senator John Kerry, Massachusetts
Representative Bill Delahunt, Massachusetts

Commonwealth of Massachusetts Officials

Governor Mitt Romney
State Senator Robert O'Leary
State Representative Eric Turkington

Cape and Island Officials

Martha's Vineyard Commission
Oak Bluffs Board of Selectmen

RECEIVED
FEB 23 2005
10:00 AM

Karen K. Adams, EIS Manager
Cape Wind Energy Project
U.S. Army Corps of Engineers
New England District/Regulatory Division
696 Virginia Road
Concord, MA 07412-2751

February 22, 32005

004169

Dear Karen Adams:

While not having any objection to the energy benefit a **Wind Farm** may bring to **Cape Cod**, my wife and I (and others we know who may not write) do object to the current plan to locate **130, 400-foot+ turbines/platforms in Nantucket Sound** for the following reasons:

- 1) **A private developer using 24 square miles of a public waterway – subsidized by millions of our taxpayer dollars – for free personal gain!**
- 2) **A Federal agency in charge of permitting the Wind Farm, which does not have the right to give away public land!**
- 3) **Environmental impact studies paid by the developer!**
- 4) **A risky pilot project for Nantucket Sound by a developer who hasn't constructed a single wind turbine!**
- 5) **The hazards to navigation, the fishing industry, and migrating birds!**
- 6) **The enormity of each of the 130 turbines:**
 - **420 feet (?) high – that's 100 feet taller than the Bourne or Sagamore Bridges!**
 - **Each tower with 3 blades rotating in a 328-foot arc (almost as big as a football field)!**
 - **Plans that call for 390 more wind turbines!**
 - **Each turbine drilled 80 feet into the floor of Nantucket Sound!**
 - **520 flashing, turbine-top lights!**
- 7) **The enormity of the area covered: 24 square miles (almost the size of Manhattan)!**
- 8) **The economics:**
 - **Negative impact on Cape's leading industry – Tourism – with almost 5 million yearly visitors!**
 - **A per-household savings of only 10 cents per month!**
- 9) **What is really need:**
 - **A balanced energy program of Alternative Energy sources -- like land-based wind power – and Conservation which doesn't abort great natural resources!**
 - **Smaller, and more fuel-efficient motor vehicles:**



Stephen Gould of New England, Inc.
30 Commerce Way
Tewksbury, MA 01876
(978) 851-2500
FAX (978) 851-2943

004170

Karen Kirk-Adams
Cape Wind Energy EIS Project
U.S. Army Corps of Engineers, New England District
696 Virginia Road
Concord, MA 01742

February 24, 2005

Dear Karen Kirk-Adams,

The DEIS for the proposed Cape Wind Energy Project contains a noise study, which was principally written by a Meteorologist, Mr. Peter Guldberg, President, Tech Environmental, who has extensive experience and academic credentials in meteorology, but comparatively limited experience and academic qualification in the field of Environmental Acoustics. The principal area of expertise of Mr. Guldberg and members of his firm, are in meteorology and air quality analysis (gases, odors, and particulates in the atmosphere, etc.), rather than sound.

Mr. Guldberg is generally not well respected in the field of Environmental Acoustics. Unfortunately, he has become recognized in the field as a "hired gun" who provides evaluations, reports, and testimony in favor of his client; rather than objective and comprehensive evaluation of all aspects of an environmental sound analysis. Mr. Guldberg often adopts a clever technique, which is to only present information favorable to his client, and to not report any negative aspects of environmental sound that would possibly jeopardize his client's project. Therefore, using this technique, Mr. Guldberg's reports are typically factual, but not complete.

However, in a recent court case, Mr. Guldberg presented "expert" testimony in court in connection with a project he conducted on behalf of a client. During this testimony, Mr. Guldberg made certain definitive statements about sound and acoustical criteria, which supported his client's case in the lawsuit. However, these statements clearly conflicted with other statements that he had made in the past (on behalf of other clients), which were on the public record. Attorneys representing the other party in the recent lawsuit had researched Mr. Guldberg's comments on the public record prior to court proceedings. In court, the attorneys challenged Mr. Guldberg's testimony, using Mr. Guldberg's previous statements. Mr. Guldberg's court testimony was thereby discredited, and he was dismissed from the courtroom.

With respect to the Cape Wind Energy Project, Mr. Goldberg's report completely ignored what is probably the most important aspect of environmental noise impact potentially generated by large-diameter wind mills in an ocean setting. This aspect is low-frequency sound and particularly infrasound, which is sound at frequencies (tone, pitch) below the range of human hearing frequency response. Low-frequency sound and infrasound can (and has) resulted in vibration of lightweight components in buildings, typically

resulting in window and ceiling fixtures "rattling", etc. In addition, low frequency sound and upper harmonics of infrasonic fundamental frequencies can be perceived by human hearing, often at significant distances, miles from the source. Finally, there is some concern that infrasound and/or upper order harmonics of infrasound may be within the range of response of and potential disruption to many marine animals, most importantly whales.

The fact that infrasound analysis was totally ignored in the DEIS environmental sound study report is commensurate with Mr. Goldberg's modus operandi.

I request that the Army Corps of Engineers request a full and objective environmental noise impact study of the Cape Energy Wind Project, including infrasound analysis.

Given Mr. Goldberg's track record on the public forum, I request that another private consulting firm or public agency be considered to conduct the appropriate evaluation.

I suggest that if a firm is to be considered, that firm should be a member of the National Council of Acoustical Consultants (NCAC) and that member(s) of the private firm or government agency principally responsible for the evaluation and written report be Board-Certified members of the Institute of Noise Control Engineers (INCE).

Thank you for your consideration in this matter.
William Frantzen
20 Summit Path
Framingham, MA 01701

RECEIVED

10/16/03

**Stephen
Gould**
corporation

14 Rosewood Drive
Pittsford, NY 14534
Feb. 20, 2005

Karen Kirk-Adams
Cape Wind Energy E+S Project
U.S. Army Corps of Engineers, New England District
696 Virginia Road
Concord, MA. 01742

004171

Dear Karen,

Please do not let Cape Wind build offshore
wind turbines, or anything else, in Nantucket Sound.
It is critical that the Army Corps does not let this
happen.

Thank you for hearing our opposition.

Alice H. Scudder

Scott M. Scudder

ALICE AND SCOTT SCUDDER
PROPERTY OWNERS ON CAPE COD

RECEIVED

FEB 20 2005

U.S. ARMY CORPS OF ENGINEERS

John Lennox
680 Samoset Road
Eastham, MA 02642

004172

February 24, 2005

Karen Kirk-Adams
696 Virginia Road
Concord, MA 01742-2752

Dear Ms. Kirk-Adams:

I strongly support construction of the Cape Wind Project on Horseshoe Shoals and request that the Draft Environmental Impact Statement be approved as soon as possible.

I am a 61-year-old man presently living on Cape Cod. I served in the U.S. Military for 24 years and have been involved in the preparation and review of Draft EIS's for several large ground based radars, including one on Cape Cod. My overall assessment is that the Cape Wind Draft EIS is well done and addresses major issues in a thorough manner.

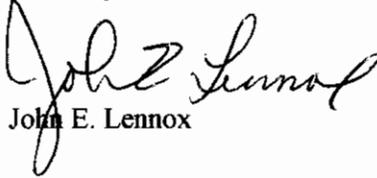
I do, however, have one comment that I believe would improve one aspect of the document. Some opponents to the Cape Wind Project argue that the visual impact of the wind farm on Horseshoe Shoal is cause enough to stop the project. I do not agree with that statement and believe the opposite to be true. People will find them to be beautiful just as they do in other parts of the country. The EIS could do a better job scoping the visual "impact" by the addition of text and Tables/Figures. Based on comments that I read in the Cape Cod Times, I sense that opponents believe the wind farm will cover the entire horizon from east to west as far as the eye can see. That is not true. If one looks at the wind farm from Point Gammon, 4.7 miles from the wind farm, the wind farm will only occupy a limited section of the horizon; an angle subtended by the eastern most WTG and the western most WTG from Point Gammon. That angle may be just 30 degrees. I have looked at maps but have not done the calculations, but a Table could be constructed listing various observation points (beaches, historical sites, etc.), their distance to the wind farm, and the visual angle on the horizon that the wind farm will cover. That data with a Figure illustrating one case, i.e. Point Gannon, and a narrative description of the Table and Figure would help people understand the limited visual impact that the wind farm will have. The EIS must also emphasize that the wind farm will only occupy 24 square miles of the 550 square miles in Nantucket Sound. I believe that the wind farm will not have a detrimental impact on tourism. Tourism on the Cape has fallen during the last two years, and the wind farm may even help bring new people to the Cape from around the world.

The EIS adequately addresses my concern for recreational and commercial fishing and is consistent with information that was provided by a commercial fisherman at one of the information sessions held at Cape Cod Community College. My other concern for Federally-listed protected species had been addressed by the EIS determination that this "does not appear to be an important area (i.e. Horseshoe Shoal) for these species of whales" and that turtles, especially Kemps' ridley turtles, are not observed in the shallow Horseshoe Shoals area.

I fully support the Cape Wind Project for four reasons. Number one: it is the right thing to do! We need to protect our environment. This farm alone will not solve the world's problems but it will improve air quality here on Cape Cod in the long term, without a significant impact to the marine environment. We need to start one step at a time. Number two: it will help our college graduates here on Cape Cod get jobs. Cape Cod Community College (CCCC) has initiated an educational program centered on wind technology because they believe that it is an important technology for our future. CCCC believes that by offering this study to college students on the Cape they will prepare them for jobs around the world. I applaud their foresight. Cape Cod could become the center for wind farm technology and development in the U.S. Cape Wind can help CCCC achieve that goal and vision. Number three: the wind farm will benefit retired people on Cape Cod living on fixed incomes by stabilizing the cost of electricity. The biggest shock that my family had when moving to Cape Cod four years ago was the high cost of default electricity. Others share that pain. Number four: wind energy will reduce our reliance on high cost oil from the Middle East.

Once again, I strongly support the EIS process and approval of the draft EIS.

Sincerely

A handwritten signature in cursive script that reads "John E. Lennox". The signature is written in dark ink and is positioned above the printed name.

John E. Lennox

RECEIVED
FEB 13 2006
U.S. DEPARTMENT OF ENERGY

TO: US Army Corps of Engineers: att Karantertz Adame
MEPA Office: att Anne Canaday

Comment Sheet
On Draft Environmental Impact Statement (EIS)
For the proposal for an Offshore Wind Project
In Nantucket Sound

004173

Name: SHIRLEY A. FISHER

Address: 115 Old Stage Rd
CENTERVILLE MA
02632

Phone Number (Please include area code): 508 775 1637

Email Address: HERONMAN@AOL.COM

Please state your questions/comments in the space below:

Since the Cape Wind project was initiated, I have made every effort to keep an open mind and to become an educated layperson. I have read summaries of the DEIS/DEIR report, attended three public meetings, and discussed the issues with numerous friends here on Cape Cod. I have tried to BALANCE the global warming, dependence on fossil fuels, and clean air arguments (among others) VS. impacts on the environment, unregulated public "ocean land", and beauty of Nantucket Sound arguments, to name a few.

After listening to the various view points and attempting to digest the "scientific" data, I conclude that this is the wrong project for the wrong reason, the wrong size, the wrong location and the wrong time. It is seriously flawed with inaccurate and nonlongitudinal data. Economic data on energy savings is not conclusive. There is no indication of compromise or mitigation or analysis of alternative locations on the part of Cape Wind developers. I am in full agreement with the Cape Cod Commission's conclusion asking for at least, a supplemental DEIS/DEIR.

Please fold this questionnaire in half, affix two stickers or pieces of tape, and mail it to the address listed on the other side.

Ask this fundamental question: do the probable BENEFITS AS PROPOSED BY CAPE WIND OUTWEIGH THE POTENTIAL RISKS? THE ANSWER IS NO. This project should NOT be permitted.

P.O. Box 774
Siasconset, MA 02564

004174

Ref. File No. NAE 2004-338-1

To: Karen Kirk Adams,

I am writing you regarding the proposed Cape Wind Project and whether, as an operator of SSA ferries, I navigate in the proposed wind farm area.

I transit through or tack into the area of the proposed wind farm whenever wind and sea conditions warrant such course of action. Primarily, easterly and westerly winds create these conditions. Typical routes would be; west of Half Moon Shoal with the Flying Gloud (high speed ferry) and tacking into the proposed wind farm area with all vessels to provide more comfort and safety for passengers and to the safe transportation of cargo.

I hope that our navigational options will not be reduced by this project and that the Steamship Authority service to the Islands will continue unaffected by the Cape Wind Project.

Regards,
Bruce J Malenfant
SSA Captain

RECEIVED

FEB 13 2005

11:00 AM

Cape Wind must confront local opinion

By CLIFFORD CARROLL

If all politics is local, as Tip O'Neill once remarked, the Cape Wind project is now entering very unfriendly water as it finally gets the close scrutiny that the federal Army Corps process has failed to deliver.

Cape Wind's strategy from the start has been to try to convince the locals that this \$800 million industrial project will somehow be good for Cape Cod and the islands with its promises of abundant clean energy, jobs and a massive reduction in polluting emissions from nearby electricity-generating plants. Critics of the project have long pointed out that Cape Wind's claims are grossly overstated, but you wouldn't know it from reading the 3,800-page, 24-pound Draft Environmental Impact Statement (DEIS) written by Cape Wind's paid consultants and blessed by the Army Corps.

But then along came the Cape Cod Commission with its own professional assessment of the project and the DEIS. The DEIS conclusions "appear to be based either on an incomplete or flawed analysis," the commission report concluded. The commission went on to criticize the utter lack of "transparency" in the DEIS that makes it impossible to validate conclusions, to properly identify the source of those conclusions or provide de-

If the Cape Wind project has to pass local muster, it will never be built in Nantucket Sound.

tailed quantitative information that would allow for an independent assessment of the DEIS conclusions. In the absence of that transparent process, the commission undertook the review that the Army Corps failed to take.

So what did Cape Wind do when confronted with this show of local resolve by the Cape Cod Commission? It stood before commission members and defied its authority, telling the commissioners, in effect, they were nothing more than a little wheel in a far bigger game. *!! DISGUSTING!*

The town of Yarmouth got a similar stiff arm from Cape Wind when it insisted on having more time to comment on the incorrect representation of agreements and the negative impacts of the project as part of the state's Energy Facility Siting Board (EFSB) process.

Watch what happens next when an realignment of the state and

federal ocean boundary finds that some portion of the Cape Wind project would actually be in state water. How quickly will Cape Wind move to withdraw the offending towers and retreat to federal waters so it needn't face the music from the local citizenry?

The clearest sign yet about Cape Wind's disrespect for local opinion was the political poll it recently promoted claiming that a "near" majority - or 47 percent - of a 400-person sample of state voters support its project. Of those 400 interviews, only 16 were actually from the Cape and islands while the rest, presumably, wouldn't care if you painted the Sagamore Bridge pink for all the time they spend looking at it. Why would you care if Cape Wind puts 130 massive steel towers into the middle of our beautiful ocean vista, if you live in Worcester County?

Cape Wind's real intent with the poll was to send a not-too-subtle message to Gov. Mitt Romney and Attorney General Tom Reilly that Massachusetts voters support the project and politicians had better support it, too. But what the paid pollsters failed to mention in their interviews with participants is that the Cape Wind project will decimate the Cape's tourism-based economy and ruin a beautiful vista from every beach on Nantucket Sound in trade for an industry-

scale project that will permanently destroy the unique character of Cape Cod and the islands.

If the Cape Wind project has to pass local muster, it will never be built in Nantucket Sound. The list of communities and organizations opposed to it is deep and wide, including the Nantucket and Cape Cod Chambers of Commerce, the towns of Yarmouth and Barnstable, and all three major Cape and island airports, which have filed objections with the Federal Aviation Administration. Every coast town on Nantucket Sound is demanding to see an oil spill trajectory map that would detail how 40,000 gallons of transformer oil would travel on the tides and currents should Cape Wind's transformer substation rupture into Nantucket Sound.

It is little wonder, then, that Cape Wind is challenging the Cape Cod Commission's jurisdiction and then pushing a survey that has little or nothing to do with the Cape and islands as somehow relevant to those of us who have to live with this monstrosity. We are not fooled, and the political leaders who have stood up to this developer's roughshod tactics are not going to be intimidated.

Clifford Carroll of South Yarmouth is the founder of Wind stop.org.

004175

Re Cape Wind: ; ^{inconvenient}

If you do not know ^{if}
no from yes, drive down
the Pacific Highway in
Oregon + California.

The wind farms are
deplorable!

No is the only choice!
Priscilla Dean

004178

ST. PATA, EX AND D. CAPE COAST GENERATOR



004177

Dear Ms. Kirk-Adams,

Today is February 24, the last day, I'm told, I can write to urge that

Cape Wind proceed. I wholeheartedly support the project and, as a supporter of renewable energy, would

be very disappointed to see it fall

through. I attend Middlebury College, Vermont - far afield of my home in

Northern California. The college experience has strengthened my passion for environmental causes - and expanded them to encompass

concerns for energy independence,
job growth, and a desire to regain
pride in American leadership in positive,
innovative technologies.

Please convey my support for Cape
Wind, and that of my fellow students,
many of whom are also writing you.

Thank you for the opportunity
to express these views.

Best,

G. May Boene
MC Box 2124
Middlebury College
Middlebury, VT 05753

FEB 28 2016

U.S. MAIL PERMIT NO. 1000 MIDDLEBURY VT

2/23/05

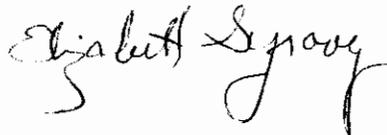
004178

To Karen Kirk-Adams:

To put it very simply, I am absolutely opposed to the Cape Wind project. There are numerous reasons for my opinion, some of which are: the noise pollution, the light pollution from the 500+ red and amber lights on the towers and platform, the relative meager cost savings which would come from the project, and the paltry, if any, benefits to the local cape community. The main reason, however, why I am so opposed to this project, let it be known that I am very much in favor of alternative energy sources, is the proposed location; Nantucket Sound. This is such a local and state and national treasure! It is shocking and enormously sad to think that it could forever be ruined by the Cape Wind project. The fact that the multitude of towers will appear to "only" be three or so inches high when seen from the shore is no consolation what so ever. This project cannot go forward as planned in the Nantucket Sound! How is it even possible that it is proposed? Please stop this from ever happening. It would be a mistake on the most enormous scale.

Sincerely,
Elizabeth Syrov
bsyr@hotmail.com

P.O. Box 551
Centerville, MA 02632



02/23/05
10:15 AM
CENTERVILLE, MA

ANN B. CANEDY
BARNSTABLE TOWN COUNCIL - PRECINCT ONE

Box 23, Cummaquid, MA. 02637

508-362-4561

acanedyc@comcast.net

004173

February 23, 2005

Karen Kirk-Adams
Cape Wind Energy EIS Project
U.S. Army Corps of Engineers, New England District
696 Virginia Road
Concord, MA. 01742

Dear Ms. Karen Kirk-Adams:

I am an elected Barnstable Town Councilor. **I want to express my opposition to siting wind turbines in Nantucket Sound** without a viable and enforceable ocean management plan in place.

Although the Town Council is closest in proximity to the project and closest in representation to the citizens most affected, unfortunately we have had and will have no input in its creation, operation, maintenance, or siting. This is an absolutely unsound precedence.

As a Town Councilor, I am responsible in part for creating and enforcing zoning ordinances for land use within the Town of Barnstable. As Town leaders, we strive to control the quantity and quality of growth by incorporating smart growth principles. We have created the framework within which we want development to occur. We balance our economic, historic, and environmental issues in a common sense way by employing the tools of our administrative code and zoning ordinances and by drawing on the expertise of our constituent committees. Just as we insist on a framework and a process in dealing with land transactions, we should insist on a framework and a process at sea. Just as we do not allow squatting and land grabs in real estate on land, we should not allow it at sea.

The Sound is a valuable pristine public natural resource which should not be developed by any private developer *without and until* the establishment of a comprehensive national and regional system of ocean management and maintenance. Without that, the Sound will be harvested by public and private interests without constraint.

Thank you for considering my concerns. A copy of this letter was sent to you by email at wind.energy@usace.army.mil.

Sincerely,

Ann B. Canedy

RECEIVED
FEB 23 2005
U.S. ARMY CORPS OF ENGINEERS

2076 Harrison Street
Wilmington NC 28401

February 28, 2005

US Army Corps of Engineers
696 Virginia RD
Concord MA 01742

004181

Colonel Thomas L Koning

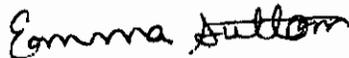
As An American Citizen concerned about the future of our world I fully support the Cape Wind Project (Action ID NAE-2004-338-1, environmental Impact report (EOEA file # 12643), Developmental Impact review(JR# 20084)). The thought of providing a whole town with energy produced without harmful emissions intrigues me.

Although the air isn't dirty enough to have a drastic effect, the thought of cleaner air is nice. The strong Environmentalists think it will harm the animals. They should think about how much animals have had to adapt. Would they rather have dirty air and more animals or a clean future with smarter animals? If we keep using oil the way we have in the past eventually global warming is going to take care of all the animals they are protecting. By making this Wind Farm it will cut down on the gasses that are emitted from coal and nuclear plants.

Personally I think Wind farms are unique looking they add personality to the area. With a certain futuristic look about them. Not only are they neat looking but they will also bring money to the towns surrounding the Wind Project. The first big wind farm is going to bring many tourist to see it is a wonderful

I would rather stay in a beach house that supports the future of our air than someone who protest to the possibly of preserving our air. I fully support the Wind Project in hopes that other projects like it will soon take place.

Sincerely



Emma E Sutton

510 Orange Street Wilmington, NC 28401

February 28, 2005

US Army Corps of Engineers,
696 Virginia Rd., Concord MA 01742

004182

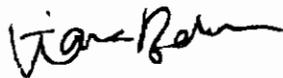
Colonel Thomas L. Koning,

My name is Tiana Bahr and I am a senior in high school. I am writing to comment on the Cape Wind Project (Action ID name-2004-338-1, Environmental Impact Report (EOEA File #12643), Development of Regional Impact Review (JR # 20084).

In school I recently have been studying alternative energy sources. When we began to learn about wind power, the Cape Wind Project came up. I believe wind power to be a great solution for alternative energy, especially in the Nantucket Sound region.

Some of the reasons I think this project should go through are because wind power provides completely clean and natural energy. This means that there are no toxic emissions. It also does not release green house gases, which stops global warming. The benefits outweigh the negative aspects of wind power; therefore I think the Cape wind Project is a fabulous project and should continue.

Sincerely,



Tiana Bahr

Brian Wood
317 Apollo Dr.
Wilmington, NC 28405

February 28th, 2005

Colonel Thomas L. Koning
District Engineer
U.S. Army Corps of Engineers
696 Virginia Rd.
Concord, MA 01742

004183

Dear Colonel,

In reference to Action 1D NAE-2004-338-1, Environmental Impact Report (EOEA File #12643), and Development of Regional Impact Review (JR #20084), I support the appropriate actions that are needed to establish the Cape Wind project in the Nantucket Sound. I believe that because of the lingering Middle-Eastern oil monopoly in our country, alternative actions must be taken to ensure the economic security of future Americans. Even now, OPEC and other oil exporting countries are raising oil prices due to the overwhelming demand for it here in America and other countries all over the world.

Some are opposed to the project because it will degrade the land value of it's surrounding area. Personally, I believe that the wind turbines are very modernized, and mechanical looking. But opinions are becoming less and less important as we come closer an economical oil crisis. As you probably already know, oil is estimated to be completely used up in this century. This project will be large enough to provide an estimated 500 megawatts of energy, even that amount of energy will help in the long run. We all must weigh the differences.

Best Regards,



Brian Wood

115 South Six Street

February 28, 2005

US Army Corps of Engineers,
696 Virginia Rd., Concord MA 01742

004184

Colonel Thomas L Koning,

My name is Paula Moore and I am a concerned, motivated, and involved citizen who is troubled about energy issues. It is through my research of the Cape Wind Project that I am in opposition to the plan. I believe there are many benefits to the plan for people, but it is not worth sacrificing the health and homes of animals. If the Cape Wind Project is put into action then there will be a private takeover of public lands to build one of the largest offshore wind power plants in the world. The installing of massive turbine towers will be in the path of boats and aircraft, and the location of industrial machinery will be in the middle of one of America's most vital migratory bird routes, as well as the visual defacement of one of the region's most cherished areas of natural beauty will probably have lasting negative effects on Cape Cod's local economy and environment. I believe we must preserve what we already have and work around what we do not.

Sincerely,

Paula Moore

Paula Moore

Action ID NAE-2004-338-1
Environmental Impact Report (EOEA File #12643)
Development of Regional Impact Review (JR#20084)

004185

February 28, 2005

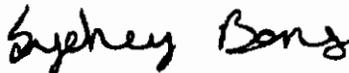
4325 Appleton Way
Wilmington NC, 28412US Army Corps
District Engineer
696 Virginia Rd.,
Concord MA, 01743

To: Colonel Thomas L. Koning,

My name is Sydney Bens. This letter is in reference to Action ID NAB-2004-338-1 Environmental Impact Report (EOEA File #12-643) Development of Regional Impact Review (JR # 20084). Recently in my science class we have been studying alternative energy sources. This has made me an involved and motivated citizen with concerns about our countries use of alternative energy sources. I am especially concerned about The Cape Wind Energy Project.

Although, this project will not directly involve the area that I live in by getting the energy it would produce, I do still see many benefits for the project. As the country progress' into the future we need to be more concerned about things that can benefit many aspects of the world. After researching I have found that this wind project will reduce harmful emissions significantly which will help reduce global warming which indirectly effects this country as a whole. This one point is what seemed more important to me for the support of this project. This project would also help reduce the dependence on foreign oil which has become a major point of interest for this country. There are much more reasons for why this project should be approved I would just like for a reply to my letter. Thank you for your time in reviewing my letter, I hope the choices are made wisely.

Sincerely



Sydney Bens

-28 February 2005-

Xue Chen
5700 Oakbluff Lane
Wilmington, NC 28409

US Army Corps of Engineers
696 Virginia Road
Concord, MA 01742

004186

Attn: Colonel Thomas L. Koning
Re: Action ID NAE-2004-338-1
Environmental Impact Report (EDEA File #12643)
Development of Regional Impact Review (JR #20084)

Dear Colonel Koning:

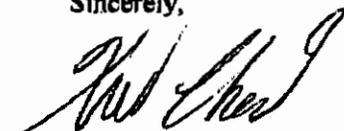
As a concern citizen who is fascinated with alternative energies, I consider the Cape Wind Project to be a project that has chosen the optimum location for a wind farm, which has the potential of bring environmental benefits as well as serving as an example to the entire nation in the battle for clean renewable energy.

Through careful and extensive research the chosen location for the wind turbines on Nantuket Sound is the best area that should hold a wind farm. If you were to look at a map of the magnitude of winds in the New England area, you would see that Nantuket Sound yields a magnitude of five to six. With such great amount of wind velocity the 130 turbines that would be planted can provide enough power to support three quarter of the island's power. The wind potential is there, why not transform all that free wind into free energy? The location is practically screaming for turbines to be put in place.

In addition to the location being the perfect area for a wind farm, if the turbines are built, it will also bring environmental benefits to Nantuket Sound. Such benefits include no emission of harmful substances. Wind will not emit pollution like carbon dioxide, nitrogen oxide, sulfur dioxide, and other air pollutants, which are pollutants that are some of the main causes for global warming, smog, acid rain, and respiratory illnesses. Wind energy will not emit these chemicals, thus, it will not contribute to global warming, smog, acid rain, and respiratory illnesses.

Along with the environmental benefits, the Cape Wind Project will serve as an example for the entire nation in the battle for clean renewable energy. This project is being watched and pondered on from east coast to west coast. For someone who lives 829 miles from Nantuket Sound the decision will affect me, my family, my community, my state, and my country. If the project continues then all eye rest upon Cape Wind, monitoring its every move. And when it is successful in delivering free wind into free energy then many more projects like Cape Wind will take place, especially in a coastal city like Wilmington. If the Cape Wind Project succeeds, then places like Wilmington will take part in the battle for clean energy. Think of the possibilities.

Sincerely,



Xue Chen

2/27/05

US Army Corps of Engineers,
696 Virginia Rd.
Concord MA 01742

004187

Dear Colonel,

I feel that we are at an important time in our countries life, where it has become essential to start working with alternate energy sources in order to ensure the welfare and cleanliness of or country for future generations. We have come to partake in the over usage of energy at modern rates of consumption and are in desperate need of new ideas and speculation. Our energy is no longer expendable as in the past.

After much research and speculation concerning the cape wind project, (action ID NAE2004-338-1, Environmental Impact report[EOEA file #12643] Development of Regional Impact Review[JR #20084]) I have come to recognize it as a necessity, and i feel that we will reap it's benefits for decade to come.

Sincerely,

A handwritten signature in black ink, appearing to read "William Marshall". The signature is written in a cursive style with a long, sweeping underline that extends across the width of the signature.

William Marshall

4305 Maidstone Drive
Wilmington, NC 28405

2/28/05

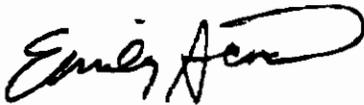
Colonel Thomas L. Koning
District Engineer, US Army Corps of Engineers
696 Virginia Rd.
Concord, MA 01742

004183

Colonel Koning,

I am interested in expressing my opinion for the continuation of the Cape Wind Project (Action ID NAE-2004-338-1, Environmental Impact Report EOE A File# 12643, Developmental of Regional Impact Review JR# 20084). As a citizen of the southeast that is interested in energy issues, I found the Cape Wind Project to be a great idea considering how cheap and clean wind energy is. As far as aesthetics and noise pollution go, turbines would be no noisier than your average traffic and I personally find them to be unique and modern in design. Most of all, I believe that we should take advantage of the wind potential of this region since areas like the one that I live in is too flat to consider it. Thank you for your time and effort, I look forward to the decision.

Sincerely,



Emily Acuna

3107 Durbin CT
Wilmington NC, 28409

February 27, 2005

US Army Corps
696 Virginia Rd.
Concord MA 01742

004183

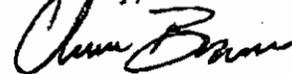
Dear Colonel,

My name is Chase Brewer and I live in Wilmington North Carolina. I have recently come across the Cape Wind Project (Action ID NAE-2004-338-1, Environment Impact Report EOE # 12-643, Development of Regional Impact Review JR*20084) and it has caught my attention. I have recently been researching alternative forms of energy and different sources. Thus since coming across this project I have been quite interested in the status of this program and if it will happen.

With the overuse of fossil fuels in today's world it is time to begin finding other sources of energy and better ways to conserve the energy we have now. This is why I am in full support of this Cape Wind Project, I think that this will be a good way to begin reducing fossil fuel consumption. With the proposed 130 turbines producing 420 Mw this will help the US replace 113 barrels or so of oil each year. Even though this number is very small it will still hopefully help other projects similar to this one begin to spring up all across the US.

With the support of many others I feel that this project will be very beneficial to everyone in the US, not just the selected region that is chosen to be the site. Thus as I have stated before I am in full support of this project and I feel that it should go ahead and be done. Thank you for your time and if possible I would like to hear back as to the status of this project.

Sincerely,



Chase Brewer



America's First Offshore Wind Farm In Nantucket Sound :: February 27th, 2005

The Cape Wind Project

- [Project Overview](#)
- [Frequently Asked Questions](#)
- [Benefits to Cape Cod](#)
- [Supplying Cape Cod's Electricity](#)
- [Cape Wind in the News](#)
- [Our Supporters](#)
- [How You Can Help](#)
- [About Cape Wind Associates](#)

Wind Energy & Our Environment

- [All About Wind Energy](#)
- [Protecting our Environment](#)
- [Why Renewable Energy?](#)
- [Teaching Kids](#)

Website Tools

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Stay Informed!

Get a bumper sticker and stay informed by email, mail or phone about what's going on with the Cape Wind

Project Overview :: Project At a Glance

Project at a glance

About the Cape Wind project



The Cape Wind project—the first offshore wind park in the United States—will be built on Horseshoe Shoal, five miles off the Cape Cod shore in Massachusetts. The wind park will consist of 130 wind turbines, with a total maximum output of 420 megawatts. In average conditions the wind park will produce enough electricity to power three-quarters of the Cape and Islands with clean, renewable energy.

This project is good for Cape Cod, New England and our country.

- ▶ Cape Wind will help reduce America's reliance on imported oil and gas, which we import from politically unstable regions of the world. The project will be capable of producing up to 13 million gallons of oil per year.
- ▶ From the shore, the slender supporting towers will blend in with the horizon and will be only one half inch above the horizon on clear days. With the turbines using less than one acre on Horseshoe Shoal and spaced one-third to one-half mile apart, the park will have little impact on the existing uses of the shoal.
- ▶ The project will bring high-paying construction jobs to Cape Cod, as well as new tax opportunities for local marinas and tour operators, providing a boost to the local economy. The project will create between 600 and 1,000 new jobs.

Clean, natural energy

Wind power is clean power. The Cape Wind park will deliver clean electricity, producing no emissions—no billows of toxic smoke into the air and no acid rain falling into our lakes, streams and forests. And as clean wind energy doesn't produce greenhouse gases, it contributes to the solution of global warming. When the wind park is fully operational, it will eliminate 4,642 tons of carbon dioxide, 120 tons of carbon monoxide, 1,566 tons of nitrous oxides, more than a million tons of greenhouse gases, and 448 tons of particulates from being dumped into the air annually. [Learn more about the environmental benefits of clean wind power.](#)

A proven technology

Wind power is a proven technology with a long history. Land-based wind parks are already producing clean electricity throughout the United States—in California, Texas and Hawaii—and throughout the world. Although offshore wind parks are a relatively new development, wind parks like the project are successfully operating off the shores of Europe, and many more are on the drawing boards.

2405 Mimosa Place
Wilmington, NC 28403

February 24, 2005

U.S. Army Corps of Engineers
696 Virginia Road
Concord, MA 01742

004190

Colonel Koning:

As an active young citizen of America, I am writing to express my opinion on the Cape Wind Project (Action ID NAE-2004-338-1, Environmental Impact Report EOEAFile#12643, Development of Regional Impact Review JR#20084). I think the Cape Wind Project has great potential, especially being the United States first offshore wind farm.

There are many benefits on this developing endeavor. Cape Cod will economically benefit directly from the project. According to the Cape Wind Associates, the offshore wind farm will create approximately 600 to 1,000 jobs in the region. The boost of the local economy will be a contribution of the high-paying construction jobs. Year-round jobs will be given to people who will monitor, operate and maintain the park. Also, a significant increase in revenue and taxes will be distributed to the state and towns.

The wind park employees will work hard to preserve the natural beauty of Cape Cod, Martha's Vineyard and Nantucket. Tourism and recreation will most likely increase and contribute to a bigger variety of people who come to see the first offshore wind farm. The project may also contribute to the improvement of the catches of local recreational fisherman.

The production of the successful Cape Wind Project may be a spark to other towns and states that may begin to consider building offshore wind farms. After all, wind energy is the fastest growing renewable resource on the market today. We, as a nation, have the chance to steer away from fossil fuels and depend on resources that are unlimited in amount. The Cape Wind Project has the capability of providing 75% of the electricity that is used in Cape and Islands.

To conclude, I believe the Cape Wind Project should be furthered in its progress on becoming an offshore wind farm. It has the ability to create new jobs, produce clean energy, reduce our dependence on foreign oil, provide more tourism and many other ideal factors that will promote the success of the wind farm itself.

I believe that young voters research, ideas and positions can help influence decisions that will affect our futures. Thank you for your time in reading my letter and hopefully providing a response.

Sincerely,

Chelsea Bruestle

Chelsea Bruestle

Kelsey Loeser
304 Garnercrest Rd.
Wilmington, N.C 28411

February 28, 2005

U.S Army Corps of Engineers
696 Virginia Rd.
Concord, MA 01742

004191

Colonel Koning,

Since wind energy is one of the fastest growing alternate energy sources, at the rate of 24%, I think it is an excellent idea to pursue it. Especially through the Cape Wind Project also known as Action ID NAE-2004-338-1, Environmental Impact Report <EOEA File # 12643>, and Development of Regional Impact Review <JR # 20084>. With such advantages as clean air, being domestically produced, and cost currently at \$0.05 per kWh it is no wonder why so many people are leaning towards wind power. Since the wind turbines do not require any natural resources such as coal, oil, and gases harmful gases that would be emitted into the atmosphere through power plants will be eliminated. Thus decreasing the green house effect. Being domestically produced is a simple benefit, for we will not have to depend on others for energy, and cost is a given. I know many of the arguments against wind energy are the noise, harm to birds, and etcetera but the truth is wind turbines don't even kill 1 bird for every 10,000 when buildings and windows kill around 5,500 birds for every 10,000. For the noise, it is said that a wind turbine 300 meters away is no noisier than the reading room of a library. In my opinion wind energy as an alternate energy source is the way to go, no excuses. Our world will be a safe and cleaner world. Thank you for your time, and I hope you will be able to see my point of view and take it in consideration. It would be great to hear a reply on your views as well. Thank you again.

Sincerely,



Kelsey Loeser