

DEIS PROBLEMS AND DEFICIENCIES

March 3, 2008

1. The DEIS is premature. Without the national regulations on offshore renewable energy being in place, it is impossible to properly review the Cape Wind DEIS. MMS has proceeded hastily, and justifies its action with a 'build it now, fix it later' approach.
2. The DEIS says that Cape Wind would produce electricity at two to three times current wholesale costs in the area. The report also says that none of the sites under review, including Cape Wind's preferred site on Horseshoe Shoal, are economically viable. Why then is MMS proceeding with review of Cape Wind? Who will foot the bill if it gets built? After seven years, Cape Wind still refuses to answer the question, "How much is this project going to cost ratepayers?"
3. The DEIS is deficient in a multitude of ways:
 - a. The Coast Guard Terms and Conditions for safe navigation in Nantucket Sound have not been written, and were to be included in the DEIS, therefore the question of safe operation of vessels in Nantucket Sound is not answered.
 - b. The FAA study on the potential impact of the wind turbines on radar operation for the municipal airports on Martha's Vineyard, Nantucket, and in Hyannis have not been conducted. FAA recently issued a determination of 'presumed hazard' regarding the Cape Wind project, pending the outcome of its study. The question of safe air travel in Nantucket Sound remains unanswered.
 - c. The US Fish & Wildlife Service is just now preparing a Biological Assessment for the endangered species of birds that will be affected by the Cape Wind project. Without this assessment, and issuance of the subsequent Biological Opinion, the question of likely impacts to bird species remains unanswered.
 - d. The MMS is required to consult with sister agencies to determine the impacts of the project on historic resources. There are hundreds, if not over a thousand, historic properties around Nantucket Sound that are protected from adverse impacts by federal law. MMS is only just beginning the consultation process on conservation of these properties, so the question of protection of historic resources, including at least two National Historic Landmarks, the Kennedy Compound and the island of Nantucket, remain unknown.
4. The DEIS is erroneous and/or incomplete in a multitude of ways:
 - a. The aviation sections do not adequately portray potential impacts to aviation, and fail to recognize or address the impacts on visual flight rule operations, of which there are over 250,000 annually crossing Nantucket Sound.

- b. The effects of the turbines on proper operation of vessel navigation radar are not addressed, and could be significant based on findings in Europe.
 - c. The DEIS admits any air pollution reductions from Cape Wind will be very small. The benefits claimed by Cape Wind are greatly exaggerated.
 - d. The DEIS does not take into account the potential for discharge of up to 1.3 million gallons of fuel oil if the tanker Great Gull were to collide with a turbine.
 - e. The DEIS contains only a cursory analysis of the potential impacts of the project on the rich sea floor habitat that will be dug up to install the turbines and nearly 100 miles of interconnecting cable
 - f. The DEIS has no assessment of how the scenic degradation caused by the Cape Wind project will impact the local economy in terms of the attractiveness of the area to tourists
 - g. MMS apparently relied entirely on the bird studies conducted by Cape Wind, which are inadequate and biased, and systematically understate the potential impacts to birds, including endangered birds and up to 1 million sea ducks in the Sound.
 - h. Noise and night lighting are underplayed in the DEIS, but experts believe these impacts will be significant.
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