

October 7, 2024

Deb Halaand, US Secretary of the Interior  
Department of the Interior  
1849 C Street, N.W., MS-4106  
Washington DC 20240

Dear Secretary Halaand:

The Cape Cod National Seashore Advisory Commission met on October 7, 2024 and voted to uphold our obligation to you per our letters of appointment to consult with you “with respect to matters relating to the development of the Cape Cod National Seashore”. This letter is submitted for your careful consideration and response.

We are concerned about the Bureau of Ocean Energy Management (BOEM) proposed lease sale on October 29, 2024 of the “Gulf of Maine WEA”.

We endorse the letters sent to you by the elected officials in Barnstable County as attached.

1. 8/30/24 letter sent by the Barnstable County Assembly of Delegates, the legislative branch of county government representing all municipalities on Cape Cod
2. 7/22/24 letter sent by the Cape and Islands Municipal Leaders Association, Inc. (CIMLA), membership of 105 elected officials, represents the twenty-two municipalities of Cape Cod, Martha's Vineyard and Nantucket.

Furthermore, the National Park Service was created in 1916 with the Organic Act (16 U.S.C. 1 2 3, and 4), as set forth herein, and consists of the Act of Aug. 25 1916 (39 Stat. 535) and amendments thereto. The agency’s mission as managers of national parks and monuments is “to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.”<sup>1</sup>

Cape Cod National Seashore (CCNS) was signed into law by President John F. Kennedy on August 7, 1961 with S. 857 Public Law 87-126, Cape Cod National Seashore Act.<sup>2</sup> The Foundation Document of Cod National Seashore states “the purposes of Cape Cod National Seashore are to preserve the nationally significant and special cultural and natural features, distinctive patterns of human activity, and ambience that characterize the Outer Cape, along with the associated scenic, cultural, historic, scientific, and recreational values, and to provide opportunities for current and future generations to experience, enjoy, and understand these features and values.” Included in the CCNS Purpose is: “Cape Cod’s beauty, solitude, and aesthetic values have offered inspiration and renewal for more than 100 years and contributed to a rich artistic and architectural heritage. Proximity to densely populated areas of the Northeast makes the Cape accessible to millions.” Also in the Foundation Document of CCNS it states: “Cape Cod continues to be recognized for its special charm and unique ambience, and its proximity to densely populated and developed areas makes its special

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<sup>1</sup> <https://www.nps.gov/grba/learn/management/organic-act-of-1916.htm>

<sup>2</sup> [https://www.jfklibrary.org/asset-viewer/archives/jfkwhp-1961-08-07-a#?image\\_identifier=JFKWHP-AR6733-B](https://www.jfklibrary.org/asset-viewer/archives/jfkwhp-1961-08-07-a#?image_identifier=JFKWHP-AR6733-B)

character all the more important to preserve.”<sup>3</sup> President John F. Kennedy had the insight to establish the National Seashores beginning with Cape Cod National Seashore to protect this land and its viewshed for future generations. Cape Cod National Seashore is indeed a national treasure, all United States citizens are its stakeholders.

The proposed lease sale plans call for implementing an industrial development of approximately 1,000 wind turbines almost 1,200 feet high off of Cape Cod National Seashore. All wind turbines in proposed lease areas OCS-A 0564, OCS-A 0567, OCS-A 0568, and many wind turbines in lease areas OCS-A 0565 and OCS-A 0569 and potentially wind turbines in lease area OCS-A 0566 would be visible day and or at night from our ocean beaches and near uplands for 40 miles long all along the national seashore, thereby impacting the viewshed during the day and the dark night sky. This according to a BOEM expert. Furthermore, if CCNS is industrialized it may set a precedent to industrialize any national park throughout the United States.

In your words, “At the Department of the Interior, we know that nature is essential to the health, well-being, and prosperity of every family and every community in America... our lands and waters define who we are and who we, as a nation, want to be. As [per] ...Executive Order 14008...President Biden has issued a call to action that we work together to conserve, connect, and restore at least 30 percent of our lands and waters by 2030 for the sake of our economy, our health, and our well-being.”<sup>4</sup> It makes good common sense to protect the land and ocean waters of and around our National Parks and National Seashores first.

**We therefore ask you to stop the process from moving to the next steps and implement a hard reset of the clock to the 2019 planning stages, thereby enforcing the BOEM Mission. This would include engaging all elected officials in Barnstable County as Task Force members and engage public participation; both of which did not happen on Cape Cod.**

If you do not take this action step now, we and many others throughout our country are seriously concerned that our iconic national seashore, the environment, our economy and our way of life will be adversely impacted.

Sincerely,

Cape Cod National Seashore Advisory Commission

cc:

Joseph Biden, President of the United States  
Kamala Harris, Vice President of the United States  
Edward Markey, US Senator of MA  
Elizabeth Warren, US Senator of MA  
William Keating, US Representative, 9th District of MA

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<sup>3</sup> [https://www.nps.gov/caco/learn/management/upload/CACO\\_FD\\_508-2.pdf](https://www.nps.gov/caco/learn/management/upload/CACO_FD_508-2.pdf)

<sup>4</sup> <https://www.doi.gov/priorities/america-the-beautiful>

I propose we craft a simple letter to the Secretary of the Interior supporting the letters the elected officials in Barnstable County have written to her. Furthermore stating the statues in the NPS foundation document and the CCNS foundation document as well as the Biden initiative 30 by 30 that she has endorsed on the NPS website.

**We have written letters in the past on our own as an Advisory Commission or through the Superintendent of CCNS. We do have the power, the authority and the duty to consult with the Secretary of the Interior, especially as our letters of appointment specify the obligation to consult with her “with respect to matters relating to the development of the Cape Cod National Seashore”. We can do so by writing a letter to her.**

This would include issues related to the use and enjoyment of the Seashore assets and its future. That extends to issues like erosion, public access, environmental quality and material economic and financial issues (which would affect revenues and other operating concerns). Wouldn't the development of a regional airport on the edge of the property be relevant? How about a proposed gravel pit? Or a gas fired power plant? These would all seem to be important to the future use and value of the federal property.

In the same category is the 1,000 wind turbine development off of the National Seashore ocean beaches from Provincetown to Chatham or for 40 miles long where approximately 800 may be visible from shore day and/or at night. Also where it is entirely possible that 12 transmission lines with 500 MW of power each may be brought ashore in the National Seashore towns and run through the towns. And where it is possible power substations, other infrastructure and energy transmission may be sited.

Furthermore, given the blade failure and debris from the Vineyard Wind almost 900 foot high wind turbine this summer, with 1,000 wind turbines planned at almost 1,200 feet high, this situation is a distinct reality for CCNS ocean beaches. The Vineyard Wind turbine blade is more than 350 feet long, and weighs almost 60 tons. The debris from the current blade has washed up on Nantucket, Martha's Vineyard, Cape Cod, Southeastern MA and Rhode Island. Only a small fraction of the blade has come ashore at this time. Small bits are strewn in the ocean waters and being seen in the water column. Debris is washing up near nesting critically endangered piping plovers. The far-reaching impacts and implications of this wind turbine blade to wildlife including whales, fish and shellfish as well as the economy are only now being assessed and are at this time undetermined.

The materials are toxic. According to our local NPR station interview with “Valeria La Saponara who's a professor at the University of California, Davis, in mechanical and aerospace engineering. She said she's been studying the materials used to build wind turbines for about 25 years, and reviewed GE Vernova's Material Safety Data sheets, which detail the composition of the blade materials. “Any time that you see polyester, vinylaster, gel coat, [PFAS] and PVC forms, these are all carcinogenic materials,” she said. ..Ultimately, she found ...[the wind turbine industry] characterization of the materials as “nontoxic” was rushed at best, misleading or even BS at worst -- her word, not mine.”<sup>1</sup>

Testimony at a 2024 US congressional hearing held on offshore wind energy included the following: “Meghan Lapp, fisheries liaison and general manager at Seafreeze, Ltd., a fishing company based in

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<sup>1</sup> <https://www.wgbh.org/news/local/2024-08-08/environmental-concerns-a-closer-look-at-vineyard-wind-turbine-debris>

Rhode Island, testified that in 2014 an offshore wind insurer estimated that out of 700,000 blades operating globally at the time, 3,800 failed each year from a range of causes, including lightning damage, human error and manufacturing defects. Lapp estimates that with 3,000 turbines operating off the East Coast, the U.S. could see 48 blade failures every year like the one in Nantucket.”<sup>2</sup> That would mean 16 blades a year ‘failing’ off of Cape Cod National Seashore, or more than 960 tons of debris a year potentially washing up on Cape Cod National Seashore ocean beaches from Provincetown to Chatham.

In winter storms, Nor’Easters, hurricanes and lightning there is a potential for additional damage to these wind turbines. One can picture pieces of one or more structures that are the size of an 84 story skyscraper crashing on our CCNS ocean beaches.

Our coastal resiliency certainly could be compromised.

Given these factors alone, it is our duty to at least question the proposed lease sale on October 29, 2024 that could jeopardize our iconic National Seashore.

**I’d like to make a motion:**

The CCNS Advisory Commission votes to write a letter to the Secretary of the Interior supporting the two letters written to her by the Barnstable County Assembly of Delegates on 8/30/24 and the Cape and Islands Municipal Leaders Association on 7/22/24. Furthermore, the letter will state the statues in the NPS foundation document and the CCNS foundation document regarding protecting the viewshed for future generations as well as the Biden initiative to protect 30% of the US land and oceans by 2030 that the Secretary of the Interior has endorsed on the NPS website.

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<sup>2</sup> <https://justthenews.com/politics-policy/energy/testimony-offshore-wind-hearing-reveals-us-could-experience-48-blade>



## Assembly Delegates

### Speaker:

**Patrick Princi**  
(Barnstable)

### Deputy Speaker:

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(Chatham)

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### Clerk of the Assembly

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# CAPE COD REGIONAL GOVERNMENT ASSEMBLY OF DELEGATES

BARNSTABLE COUNTY COMPLEX  
OLD JAIL BUILDING  
3195 MAIN STREET – ROUTE 6A  
P.O. BOX 427  
BARNSTABLE, MA 02630

August 30, 2024

Secretary Deb Halaand,  
US Secretary of the Interior  
Department of the Interior  
849 C Street, N.W., MS-4106  
Washington DC 20240

Dear Secretary Halaand,

On behalf of the Cape Cod Regional Government Assembly of Delegates, the legislative branch of Barnstable County Government representing 15 towns, we submit the following letter for your careful consideration and response.

We support responsible solutions to climate change and are committed to the transition to a clean energy environment. However, the scope of the proposal to site 10 GW of offshore wind turbines, or approximately 1,000 wind turbines, off the ocean beaches and nearshore uplands of Cape Cod National Seashore (CCNS) could have a very material impact on the environment, the way of life and economy on Cape Cod, and all national parks throughout the United States. We also have concerns regarding the recent wind turbine blade broken in the Vineyard Wind development and debris washing up on the beaches of Nantucket, Martha's Vineyard, Cape Cod, and in the ocean waters. The far-reaching impacts of this over 350-foot wind turbine blade are only now being assessed.

The Assembly of Delegates, as elected officials, are members of the Bureau of Ocean Energy Management (BOEM) Gulf of Maine Offshore Wind Task Force and should have been informed of our role as far back as 2019. As we were not included in the earlier discussions, we ask you to stop the process from moving to the next steps and instead implement a hard reset of the clock to the 2019 planning stages, thus giving all elected officials in Barnstable County the chance to serve as Task Force members. It would then allow us to hold meetings with robust public participation.

If this is not done, we are concerned that our iconic Cape Cod National Seashore, our economy and our way of life could be adversely impacted.

Sincerely,

Patrick Princi, Speaker

Barnstable County Assembly Delegates

cc: President Joseph Biden, Vice President Kamala Harris, Senator Edward Markey,  
Senator Elizabeth Warren, Congressman William Keating



CIMLA appreciates the opportunity to provide additional comments here on the draft Environmental Assessment (EA) and applauds BOEM, the states of Massachusetts, New Hampshire and Maine's commitment to decarbonizing and developing renewable energy resources.

Our comments on the EA, as further described herein, are as follows:

1. Issuance of a Final Environmental Assessment must be done prior to any lease sale including the requirement that a Programmatic Environmental Impact Statement (PIES) be conducted for the Gulf of Maine WEA.
2. We strongly request a socio-economic impact study, along with biophysical impact, be completed in advance of leasing any Gulf of Maine projects.
3. Given the extensive comments provided in the PSN and community interest in the Gulf of Maine Offshore Wind Energy Area based on the attendance at the BOEM information session held in Eastham, MA on July 17, 2024, with limited opportunities to be heard, we request a 90-day extension of the draft EA comment period.

In support of the above:

- 1. We request that a Programmatic Environmental Impact Statement (PIES) be conducted for the Gulf of Maine WEA before the sale of any leases.**

The draft Environmental Assessment for the Gulf of Maine WEA is limited to the activities associated with surveying and site characterization, and as such, the impacts are minimal. The majority of any environmental impacts will occur during construction, post-construction operations, and decommissioning. Considering the sensitivity of the environment included in the WEA, the employment of floating technology, and the variable water depth of the WEA, a PIES is warranted prior to the sale of the proposed leases.

In the Gulf of Maine Task Force meetings and public presentations in 2024, BOEM has stated that they can only assess the environmental impact after a developer has submitted a COP, and the Gantt chart of the Gulf of Maine WEA does not incorporate a PIES (BOEM, 2024b). However, BOEM is conducting PIESs for the New York Blight WEA and the California Offshore Wind WEA. The New York Blight encompasses 488,201 acres (BOEM, n.d.-b) and is in shallow water where fixed foundations can be used. The CA Offshore Wind WEA totals 373,267 acres (U.S. Department of the Interior, 2022) in very deep water, requiring floating technology. The Leases included in the Gulf of Maine PNS are twice the size of either of the WEAs where PIES are being conducted. The NMFS has commented on the Gulf of Maine PSN on the importance of additional environmental review before the sale of any leases in the Gulf of Maine due to the importance of the habitat to the critically endangered North Atlantic Right Whale, saying:

We have recommended that, prior to commercial leasing and issuance of the Final Sale Notice (FSN) in the GOM, BOEM develop a comprehensive plan for how to avoid, minimize, and mitigate effects of commercial development on the physical and biological features of this critical habitat. (NMFS, 2024)

Conducting a PIES assists BOEM in “the identification of programmatic mitigation measures [1] to lessen environmental impacts of wind energy development in the lease areas.” A PIES will simplify decision-making regarding the Gulf of Maine WEA's development and provide a greater degree of certainty for developers, enabling a greater return on any sale. In the CA WEA PIES the potential impacts being assessed are (BOEM, 2024a):

Potential impacts to resources may include adverse or beneficial impacts on air quality, bats, benthic habitat, birds, essential fish habitat, invertebrates, finfish, marine mammals, terrestrial and coastal habitats and fauna, sea turtles, wetlands and other waters of the United States, commercial fisheries and recreational fishing, cultural resources, demographics, employment, economics, environmental justice, land use and coastal infrastructure, navigation and vessel traffic, other marine uses, recreation and tourism, and

scenic and visual resources. These potential impacts will be analyzed in the draft and final PEIS.

These are all areas of concern for the Cape and Islands. The Cape and Islands region's experience with offshore wind is with the leases in the Rhode Island and Massachusetts WEA. In the RI and MA WEA, a Draft Programmatic Environmental Impact Statement was conducted before the lease areas were included in a proposed notice of sale (BOEM, n.d.). The Gulf of Maine WEA incorporates 969,999 acres, in addition to the footprint of transmission systems, and those routes will be determined at a future date. Floating technology has yet to be employed at scale and has a larger physical footprint than monopiles used in shallow water. We strongly encourage BOEM to develop a Programmatic Environmental Impact Statement under the process required by NEPA to better understand and mitigate impacts associated with developing the Gulf of Maine WEA before any of the leases are sold.

- 2. We strongly request a socio-economic impact study, along with biophysical impact, be completed in advance of leasing any Gulf of Maine projects to safeguard the interest of our Cape Cod communities and onshore environment.**

The lessons learned from the Vineyard Wind blade incident of July 13, 2024 and the closing of Nantucket beaches highlight the importance of thorough planning, risk assessment, and stakeholder engagement to ensure the success and sustainability of any offshore wind projects.

The loss of a turbine blade and subsequent beach closures in Nantucket highlight the potential for unforeseen incidents that can have immediate and significant impacts on local communities and economies. These impacts underscore the necessity of understanding and mitigating such risks before they occur.

Engaging with local communities, stakeholders, and industries that may be affected by offshore wind development is critical for building trust, addressing concerns, and ensuring that development proceeds in a manner that considers the needs and priorities of those most impacted.

Conducting a thorough impact study demonstrates a commitment to transparency and accountability, ensuring that all potential risks and benefits are carefully considered and communicated to the public.

The Vineyard Wind incident raises concerns about public health and safety ([Link](#)). Ensuring that such incidents are minimized through thorough impact assessments and preventive measures is essential for the well-being of coastal communities.

An aftermath clean-up fund doesn't satisfy or address risks. Cape Cod communities are heavily dependent on tourism and recreational activities. Any disruptions, such as those caused by offshore wind incidents, could have a substantial economic impact on these industries and our towns.

The Gulf of Maine is also home to a significant fishing industry. Offshore wind development could affect fishing grounds, navigation routes, and overall marine ecosystems, potentially impacting the livelihoods of local fishermen.

Other offshore wind energy projects may have undergone similar studies as part of regulatory requirements or best practices. Ensuring that the Gulf of Maine project meets or exceeds these standards can help avoid legal challenges and ensure regulatory compliance.

Identifying potential socio-economic impacts in advance allows for the development of effective mitigation strategies, reducing the likelihood of adverse outcomes and ensuring that any negative impacts are managed proactively.

Thank you for considering these comments along with our prior stated concerns, we request an extension of the comment period on the draft EA by an additional 90-days to provide a more adequate time for review and opportunity for more detailed comments.

BOEM-2024-0030

July 22, 2024

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Respectfully submitted,



Douglas C. Brown

President, Cape & Islands Municipal Leaders Association, Inc. and

Select Board Member, Town of Falmouth, Massachusetts

Attachment

cc: Governor Maura Healey  
Lieutenant Governor Kim Driscoll  
Secretary Rebecca Tepper, EEA  
Senator Ed Markey  
Senator Elizabeth Warren  
Representative Bill Keating  
Senator Julian Cyr  
Senator Susan L. Moran  
Senator Bruce Tarr  
Representative Sarah K. Peake  
Daniel McKiernan, Director Mass Division of Marine Fisheries  
CIMLA membership

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