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April 18, 2008

MMS Cape Wind Energy Project, TRC
Environmental Corporation
Wannalancit Mills
650 Suffolk Street
Lowell, Massachusetts 01854

Subject: Comments on the Cape Wind Energy Project Draft Environmental Impact Statement (DEIS)

The National Ocean Industries Association (NOIA) appreciates the opportunity to respond to your request for comments on the Cape Wind Energy Project Draft Environmental Impact Statement (DEIS).

NOIA is the only national trade association that represents every facet of the offshore energy industry, including offshore alternative and renewable energy sources on the Outer Continental Shelf (OCS). The NOIA membership comprises more than 300 companies engaged in all aspects of the offshore industry ranging from exploration to production, offshore construction and fabrication to finance and insurance, salvage and diving to drilling and producing, engineering and telecommunications to marine and air transport.

NOIA members represent the broad diversity of ingenuity; specialization and technological pioneering that drive the production of traditional offshore energy today, and will drive the production of alternative and renewable offshore energy in the future. Therefore, NOIA supports the environmentally sound development of renewable and alternative energy sources on the OCS. However, we caution that such projects should not conflict with any valid existing rights on the OCS as they move forward.

The Cape Wind Energy Project proposal consists of 130 3.6 megawatt wind turbine generators covering 24 square miles in Federal waters of Nantucket Sound off Massachusetts with the capacity to produce about 468 megawatts. The average expected production from the proposed wind farm could provide about 75 percent of the electricity demand for Cape Cod and the Islands of Martha's Vineyard and Nantucket. At average expected production, Cape Wind could produce enough energy to power more than 200,000 homes in Massachusetts.

In preparing the DEIS, MMS analyzed the potential impacts of the Cape Wind Energy Project (proposed action) and six proposed alternative actions; including a no action alternative, alternative configurations of the proposed action, and regional evaluation of offshore wind turbine sites to more local alternative sites. MMS considered a broad range of impact producing factors that could occur during the project lifecycle -- construction, operation and maintenance, and decommissioning. The DEIS assesses, in detail, the potential impacts of the project and the proposed alternatives to physical resources, biological resources, socioeconomic resources and land uses, and navigation and transportation. MMS also incorporated into the DEIS information from prior research, studies, and evaluations of the project -- including the 2004 DEIS compiled by the U.S. Army Corps of Engineers.

NOIA applauds the thoroughness of the Cape Wind Energy Project DEIS prepared by MMS, and recommends the project be approved in a timely manner. While the principal focus of NOIA has been offshore oil and natural gas production, we also recognize that offshore alternative energy of all types promises to provide an additional source of future contributions to our nation's growing energy needs in the future. We appreciate the opportunity to provide comments on the Cape Wind Energy Project DEIS. If you have any questions or need additional information, please contact me at (202)737-0926.

Sincerely,



Kim Harb
Director,
Policy and Government Affairs