



March 12, 2008

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

Dear Minerals Management Service,

The American Wind Energy Association appreciates this opportunity to comment on the Minerals Management Service's (MMS) Draft Environmental Impact Statement (DEIS) on Cape Wind.

We commend the MMS for having compiled a thorough and comprehensive document that examines all of the potential impacts of the Cape Wind project. In our view, the MMS DEIS verifies important public benefits of Cape Wind while finding only minimal impacts. These findings are consistent with earlier examinations of Cape Wind from several Federal and State Agencies, including the US Army Corps of Engineers, the Massachusetts Energy Facilities Siting Board and the Massachusetts Executive Office of Environmental Affairs.

Given the comprehensive and complete nature of the MMS DEIS, and the fact that Cape Wind has been under active permitting review for over six years, we strongly encourage MMS to proceed to issue a Final EIS as quickly as possible and a Record of Decision before the end of this year.

Cape Wind is a needed project for the United States to begin to commercialize its vast offshore wind potential. It is logical that MMS issue its first offshore wind lease to a project proposed for a site that enjoys the same characteristics that Europeans have found most conducive to offshore wind development: strong wind resource, shallow water, protection from large ocean storm waves, and reasonable proximity to a robust electric transmission system.

In 2005, the US Department of Energy determined there are over 900,000 megawatts of offshore wind potential in the United States with the greatest resources offshore the Mid-Atlantic and the Northeast coast. While most of this offshore potential is not economically viable for development in the foreseeable future, projects like Cape Wind will help establish an offshore wind industry in the United States. This will enable our members to get the kind of real operational experience in U.S. waters that is necessary to expand this industry as the technology continues to advance. Approval of Cape Wind

will also help the United States begin to catch up to Europe which is currently fifteen years ahead in offshore wind development.

Offshore the dense population centers and high electric demand coastal regions of the Northeast and Mid Atlantic States there exists a strong offshore wind resource that is available to provide a substantial quantity of clean electricity to these regions. Due to the Sea Breeze effect, offshore wind resources will also tend to provide a high supply of wind power during times of peak summer electric demand. This sea-breeze effect was documented by Cape Wind in their July, 2007, White Paper entitled, "*Comparison of Cape Wind Scientific Data Tower Wind Speed Data with ISO New England List of Top Ten Electric Demand Days*," which found the recorded wind speeds at the project site correlated with Cape Wind producing at 76% of its total capacity during the ten highest recorded hours of electric demand in New England history, had Cape Wind been in operation.

Offshore wind also tends to have high availability during cold winter snaps that, for regions like New England, also tend to coincide with reduced availability of natural gas, as noted by the 2004 US Department of Energy White Paper entitled, "*Natural Gas in the New England Region. Implications for Offshore Wind Generation and Fuel Diversity*."

Accelerating the development of both offshore and onshore wind power is also critically important for the United States to advance several public policy goals including: new clean tech jobs creation, greater energy independence, improved air and environmental quality, reduced greenhouse gas emissions, greater energy source diversification and greater long-term energy price stability.

The American Wind Energy Association looks forward to continuing to work constructively with the MMS in helping the United States tap its abundant offshore wind resources to provide significant benefits to the public.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in cursive script that reads "Randall Swisher". The signature is written in black ink and is positioned above the printed name and title.

Randall Swisher
Executive Director
American Wind Energy Association