

Public Comment



[EXTERNAL] Cancellation Request for GOM Wind Leases

From Elena Rice <elena.rice@gmail.com>
Date Mon 9/15/2025 4:01 AM
To Johnson, Cheryl M <cheryl_johnson@nps.gov>

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Good morning Cheryl,

Please accept my public comment for today's meeting of the CCNS Advisory commission:

Per the press release for the 9/15/25 Cape Cod National Seashore Advisory Commission below -

"The purpose of the Commission is to consult with the Secretary of the Interior, or the Secretary's designee, with respect to matters relating to the development of the Cape Cod National Seashore (CCNS), including matters of acquisition by condemnation and zoning regulations."

The CCNS Advisory Commission should do the right thing for Cape Cod and write to the Secretary of the Interior either through its designee, the Superintendent of CCNS or on its own to ask Secretary Burgum to cancel the offshore wind leases auctioned in October 2024 for the proposed "Gulf of Maine OSW" (off of Cape Cod National Seashore, in Massachusetts).

There is NO bigger matter relating to the development of the Cape Cod National Seashore than the offshore wind leases that were rushed through the approval process by the Biden Administration behind the backs of the public and the elected officials in Barnstable County in violation of the mission of the Bureau of Ocean Energy Management (BOEM).

The four lease areas held in October of 2024 should be cancelled for several reasons including:

1. THREAT TO NATIONAL SECURITY - ACTIVE RADAR

If the wind turbines are constructed they would be a threat to national security due to the ACTIVE radar installation in Truro which is the eastern most radar detection system on land in the United States. Any wind turbine constructed off of the entire ocean shoreline of Cape Cod National Seashore could compromise the active radar operations and national security of the United States.

"The Federal Aviation Administration (FAA) continues to operate a modern radar system at a 20-acre parcel" in Truro, MA

<https://clui.org/ludb/site/north-truro-air-force-station#:~:text=One> of the oldest early, North Truro FAA Radar Site).

The active radar:

- Radar type: The facility currently operates a modern ARSR-4 (Air Route Surveillance Radar) 3D radar system.

"The radar site is an Federal Aviation Administration (FAA) VHF omnidirectional range/[Tactical air navigation system](#) (VORTAC) and [radar](#) site, part of the [Joint Surveillance System](#) (JSS), designated by [NORAD](#) as [Northeast Air Defense Sector](#) (NEADS) Ground Equipment Facility J-53."

https://military-history.fandom.com/wiki/North_Truro_Air_Force_Station#:~:text=North Truro Air Force Station (AFS) is a closed United, Ground Equipment Facility J-53.

- Purpose: The data collected by the radar is used by both the FAA for air traffic control and the North American Aerospace Defense Command (NORAD) for continental air defense.
- Location: The site is located 2.2 miles east of North Truro and is sometimes referred to as the North Truro FAA Radar Site

https://fortwiki.com/North_Truro_Air_Force_Station#:~:text=Air Force Station Closure, North Truro FAA Radar Site.

2. VIOLATION OF FEDERAL STATUTES

The scope of the Gulf of Maine offshore wind proposal [in Massachusetts] is a **clear violation of Federal Statutes governing both the Foundation Document of the National Park Service and the Foundation Document of CCNS. The wind turbines proposed would be seen day and night from our iconic National Seashore ocean beaches which is in violation of two federal laws.**

The National Park Service was created in 1916 with the Organic Act (16 U.S.C. § 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.**"

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

Cape Cod National Seashore 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.

https://www.jfklibrary.org/asset-viewer/archives/jfkwhp-1961-08-07-a#?image_identifier=JFKWHP-AR6733-B

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.**" 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 character all the more important to preserve."

https://www.nps.gov/caco/learn/management/upload/CACO_FD_508-2.pdf

3. The leadership of Cape Cod wrote a number of letters to the former Secretary of the Interior and BOEM asking to NOT go forward with the lease sale in 2024.

The Barnstable County Assembly of Delegates, the legislative branch of County Government representing all 15 towns in the county sent a letter to the Secretary of the Interior on 8/30/24.

"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 of a lease sale 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."

The Mission Statement of BOEM was not followed. BOEM stated all elected officials are part of their Task Force. All elected officials in possibly impacted areas were to be informed, invited to meetings, asked to offer advise and engaged in public comment periods. At least five public comment periods were held during the planning five years. There were 100 meetings held during the planning stages prior to their first public meeting held in Barnstable County on 7/17/24. Public engagement is also part of the BOEM mission and not followed.

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 sent a letter to the Secretary of the Interior on 7/22/24, stating that "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. [In addition it was stated they]... strongly request a socio-economic impact study, along with biophysical impact, be completed in advance of leasing any Gulf of Maine projects."

"Potential impacts to resources may include...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."

Given this, please move forward to ask the Secretary of the Interior Doug Burgum to cancel the leases sold on October 29, 2024 for the Gulf of Maine offshore lease sale.

Cancellation – 30 C.F.R. § 585.422: <https://www.ecfr.gov/current/title-30/section-585.422>

The Secretary will cancel the lease or grant upon proof of fraud or misrepresentation (with opportunity for hearing), or may cancel it under any of the following conditions after notice and hearing:

1. Lessee failed to comply with OCSLA, the regulations, BOEM orders, or lease terms— continuing 30+ days after notice;
2. Lessee terminated operations under their approved COP (Construction and Operations Plan) or GAP (General Activities Plan);
3. **Required by national security or defense; or**
4. When, after hearing, the Secretary finds that continued activity would:
 - Cause serious harm or damage to natural resources, life (including human and wildlife), property, the marine/coastal/human environment, or historical/archaeological sites;
 - And that harm would not diminish within a reasonable period of time;
 - And the benefits of cancellation outweigh those of continuing the lease.

Thank you very much for your time in reviewing this comment.

Best,
Elena Rice
Truro, MA
(508) 487 - 3767

Motion

Motion:

The Cape Cod National Seashore (CCNS) Advisory Commission votes to write a letter to the Secretary of the Interior because we are concerned there is a threat to our national security and defense. The active Truro radar facility which is our land based radar first line of defense for the United States on the Eastern seaboard is within the bounds of Cape Cod National Seashore and could be compromised if wind turbines are constructed off of Cape Cod National Seashore. In addition, the proposed wind turbines violate two federal statutes governing CCNS. The first being the foundation document establishing the National Park Service and the second being the CCNS foundation document which protects the viewshed for future generations. Furthermore we support the two letters written to the office of the Secretary of the Interior by Cape Cod leadership in 2024, one by the Barnstable County Assembly of Delegates on 8/30/24 and one by the Cape and Islands Municipal Leaders Association on 7/22/24.

We respectfully submit this request per our appointment by the Secretary of the Interior as our obligation to do the right thing. We write to the Secretary of the Interior either through its designee, the Superintendent of CCNS or on our own to ask Secretary Burgum to consult with us in regards to cancel the offshore wind energy leases auctioned in October 2024 for the proposed Outer Continental Shelf (OCS) in the “Gulf of Maine” (which is off of Cape Cod National Seashore, in Massachusetts).

There is NO bigger matter relating to the development of the Cape Cod National Seashore than the offshore wind leases that were rushed through the approval process by the Biden Administration behind the backs of the public and the elected officials in Barnstable County which is in violation of the mission of the Bureau of Ocean Energy Management (BOEM) and which could compromise national security and defense.

Draft Letter - Secretary of Interior for CCNS Advisory Commission

DRAFT:

September 15, 2025

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

Dear Secretary Burgum:

The Cape Cod National Seashore (CCNS) Advisory Commission met on September 15, 2025 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”.

We respectfully submit this letter for your careful consideration and response with regards to cancelling the offshore wind energy leases auctioned in October 2024 for the proposed Outer Continental Shelf (OCS) in the “Gulf of Maine” (which is off of Cape Cod National Seashore, in Massachusetts).

We are concerned there is a threat to our national security and defense. The active Truro radar facility which is our land based radar first line of defense for the United States on the Eastern seaboard, is within the bounds of Cape Cod National Seashore and could be compromised if wind turbines are constructed off of Cape Cod National Seashore.

In addition, the proposed wind turbines violate two federal statutes governing CCNS. 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.”¹

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.² 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

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

² https://www.jfklibrary.org/asset-viewer/archives/jfkwhp-1961-08-07-a#?image_identifier=JFKWHP-AR6733-B

DRAFT:

character all the more important to preserve.”³ 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. BOEM’s website specifies construction of approximately 1,000 wind turbines almost 1,200 feet high. All wind turbines would be visible day and at night from our ocean beaches and near uplands for 40 miles long all along the national seashore, thereby industrializing the protected viewshed during the day and the dark night sky. Cape Cod National Seashore is indeed a national treasure. All United States citizens are its stakeholders. It is worth protecting for future generations.

Additionally 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.

We therefore respectfully ask you to cancel the the offshore wind energy leases auctioned in October 2024 for the proposed Outer Continental Shelf (OCS) in the “Gulf of Maine” (which is off of Cape Cod National Seashore, in Massachusetts).

Sincerely,

Cape Cod National Seashore Advisory Commission

³ https://www.nps.gov/caco/learn/management/upload/CACO_FD_508-2.pdf

Background for CCNS Advisory Board Members

It is stated in the letters of appointment to the Cape Cod National Seashore (CCNS) Advisory Commission members and alternates: "The purpose of the Commission is to consult with the Secretary of the Interior, or the Secretary's designee, with respect to matters relating to the development of the Cape Cod National Seashore (CCNS)"

It is the obligation of the Commission members to do the right thing and write to the Secretary of the Interior either through its designee, the Superintendent of CCNS or on our own to ask Secretary Burgum to consult with us in regards to cancel the offshore wind leases auctioned in October 2024 for the proposed "Gulf of Maine OSW" (off of Cape Cod National Seashore, in Massachusetts).

There is NO bigger matter relating to the development of the Cape Cod National Seashore than the offshore wind leases that were rushed through the approval process by the Biden Administration behind the backs of the public and the elected officials in Barnstable County in violation of the mission of the Bureau of Ocean Energy Management (BOEM).

AUTHORITY OF THE SECRETARY OF THE INTERIOR:

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The Secretary will cancel the lease or grant upon proof of fraud or misrepresentation (with opportunity for hearing), or may cancel it under any of the following conditions after notice and hearing:

1. Lessee failed to comply with OCSLA, the regulations, BOEM orders, or lease terms—continuing 30+ days after notice;
2. Lessee terminated operations under their approved COP (Construction and Operations Plan) or GAP (General Activities Plan);
3. **Required by national security or defense; or**
4. When, after hearing, the Secretary finds that continued activity would:
 - Cause serious harm or damage to natural resources, life (including human and wildlife), property, the marine/coastal/human environment, or historical/archaeological sites;
 - And that harm would not diminish within a reasonable period of time;
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THREAT TO NATIONAL SECURITY - ACTIVE RADAR:

If the wind turbines are constructed they would be a threat to national security due to the ACTIVE radar installation in Truro which is the eastern most radar detection system on land in the United States. Any wind turbine constructed off of the entire ocean shoreline of Cape Cod National Seashore could compromise the active radar operations and national security of the United States.

"The Federal Aviation Administration (FAA) continues to operate a modern radar system at a 20-acre parcel" in Truro, MA¹

¹ [https://clui.org/ludb/site/north-truro-air-force-station#:~:text=One of the oldest early, North Truro FAA Radar Site\).](https://clui.org/ludb/site/north-truro-air-force-station#:~:text=One%20of%20the%20oldest%20early,North%20Truro%20FAA%20Radar%20Site.)

The active radar:

Radar type: The facility currently operates a modern ARSR-4 (Air Route Surveillance Radar) 3D radar system. "The radar site is an Federal Aviation Administration (FAA) VHF omnidirectional range/ **Tactical air navigation system** (VORTAC) and **radar** site, part of the **Joint Surveillance System** (JSS), designated by **NORAD** as **Northeast Air Defense Sector** (NEADS) Ground Equipment Facility J-53."²

Purpose: The data collected by the radar is used by both the FAA for air traffic control and the North American Aerospace Defense Command (NORAD) for continental air defense.

Location: The site is located 2.2 miles east of North Truro and is sometimes referred to as the North Truro FAA Radar Site³

VIOLATION OF FEDERAL STATUTES:

The scope of the Gulf of Maine offshore wind proposal [in Massachusetts] is a **clear violation of Federal Statutes governing both the Foundation Document of the National Park Service and the Foundation Document of CCNS. The wind turbines proposed would be seen day and night from our iconic National Seashore ocean beaches which is in violation of two federal statutes.**

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.**"⁴

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³ https://fortwiki.com/North_Truro_Air_Force_Station#:~:text=Air%20Force%20Station%20Closure,North%20Truro%20FAA%20Radar%20Site.

⁴ <https://www.nps.gov/grba/learn/management/organic-act-of-1916.htm>

⁵ <https://www.jfklibrary.org/asset-viewer/archives/jfkwhp-1961-08-07-a#:~:text=JFKWHP-AR6733-B>

⁶ https://www.nps.gov/caco/learn/management/upload/CACO_FD_508-2.pdf

THE LEADERSHIP OF CAPE COD WROTE A NUMBER OF LETTERS TO THE FORMER SECRETARY OF THE INTERIOR AND BOEM ASKING TO NOT GO FORWARD WITH THE LEASE SALE IN 2024:

The Barnstable County Assembly of Delegates, the legislative branch of County Government representing all 15 towns in the county sent a letter to the Secretary of the Interior on 8/30/24. "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 of a lease sale 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."

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 sent a letter to the Secretary of the Interior on 7/22/24, stating that "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. [In addition it was stated they]... strongly request a socio-economic impact study, along with biophysical impact, be completed in advance of leasing any Gulf of Maine projects."

"Potential impacts to resources may include...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."

(See attached letters)

THE MISSION STATEMENT OF BOEM WAS NOT FOLLOWED:

BOEM stated all elected officials are part of their Task Force. All elected officials in possibly impacted areas were to be informed, invited to meetings, asked to offer advise and engaged in public comment periods. At least five public comment periods were held during the planning five years. There is NO record of the Barnstable County Assembly of Delegates being informed from 2019 until one member attended a Task Force meeting on 5/29/24 at the urging of those in the town and found this out by chance.

Public engagement was also lacking. There were 100 meetings held during the planning stages and none of these were held as public meetings in any of the six 'Seashore towns'. It was only at the urging of one member of the CCNS Advisory Commission, members of the Barnstable County Assembly of Delegates, members of the Cape and Islands Leadership Association that the 101st meeting was held in Eastham on July 17, 2024. This meeting was held during the summer which is the busy season on Cape Cod where most either work more than full time or have a more than full schedule. The meeting date was announced six days beforehand and after the deadline to publicize it in the local paper. In spite of the obstacles, over several hundred people attended from one end of the

Cape to the other. Many were pillars of the community. Most spoke in opposition to any wind turbines off of Cape Cod National Seashore.

HERE ARE MORE FACTS: BOEM 2024 TASK FORCE MEETING IN MAY 2024 CALLED FOR THE FOLLOWING:

1,000 experimental wind turbines, 1,171 feet high, 16-18 MW each or 10 GW in total. Sited for over 40 miles all along CCNS, from Provincetown to Chatham and visible from our preserved ocean beaches day and at night (destroying the dark night sky). The proposed wind turbines would be sited starting 24 miles from shore.

- A. The only place on earth with 1,000 wind turbines is in the middle of the Gobi desert.
- B. Experimental-there is no place on earth where there are floating wind turbines at this height or scale and where it has been studied regarding tethering such structures to the ocean floor with cables that have links the size of a VW bus.
- C. 1,171 feet high (or 84 stories high... or 24 stories higher than the tallest building in Massachusetts which is 60 stories high ...200 Clarendon Street (formerly called the John Hancock Tower) in Boston.
- D. 16-18 MW each - concerns abound regarding the adverse health impacts to people and animals. For example people are now nearby fishing and shellfishing commercially and recreationally, boating, shipping and on cruise lines. (One 1.65 MW wind turbine in Falmouth on Cape Cod is making a person with a 20 year history of normal and low blood pressure sick. When the wind is coming from the wrong direction for that person; their blood pressure spikes to heart attack and stroke levels. The doctor told the patient to move if this person wanted to live.) There are numerous such reports from all over the world. People living and working near wind turbines are made sick. There is credible scientific evidence to prove this is true. Now imagine what a 16-18 MW wind turbine would do to a person. Now times that by 1,000. How far away would people be adversely impacted? Animals? No one knows.
- E. 10 GW or 10,000 MW is the proposed project. Currently the largest industrial wind power plant development in the world is 1.32 GW.
- F. Transmission cables costing one and a half to eight billion dollars according to expert at BOEM meeting. It will be paid for by the Massachusetts electric rate payers.
- G. With possibly 12 transmission cables with 833 MW of power each (more power in one cable than generated at Pilgrim Nuclear Power Plant in Plymouth, MA) landing in CCNS towns; at the discretion of the wind energy companies.
- H. Substations would be needed. They have toxic fluids that could contaminate our sole source aquifer. The only source of fresh water.
- I. Fire is a serious concern on Cape Cod and especially in the Outer Cape CCNS towns. (the Barnstable substation already caught on fire)

J. The wind turbines would be visible day and night. The Vineyard Wind turbines are not only visible day and night on the two islands but also they are visible day and night from over 50 miles away in Rhode Island. Those wind turbines are a little more than 850 feet high. (Before they were built and to gain approval from the people, the wind energy company told the people on Martha's Vineyard they would NOT be visible.) The wind turbines proposed by BOEM for off of the Cape Cod National Seashore (which by federal law the viewshed is protected) are over 300 feet higher than the Vineyard Wind turbines, at 1,171 feet high.

VINEYARD WIND BLADE FAILURE AND ITS IMPLICATIONS:

There was a 'blade failure' when a turbine blade plunged into the ocean during the summer of 2024. The Vineyard Wind turbine blade is more than 350 feet long, and weighs almost 60 tons. The debris from the blade has washed up on Nantucket, Martha's Vineyard, Cape Cod, Southeastern MA and Rhode Island. Small bits were strewn in the ocean waters and were seen in the water column for months afterwards. Debris washed 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. AS OF JANUARY 2025, THERE IS STILL WELL OVER 10 TONS OF TOXIC DEBRIS UNACCOUNTED FOR.

The materials are toxic even though the wind energy company told people it is nontoxic. According to a radio 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, vinylster, 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."⁷

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 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."⁸ 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. The Vineyard Wind turbine blade plunged in the ocean during a 'summer breeze'. In winter storms, Nor'Easters, hurricanes and lightning there is a potential for additional damage to these wind turbines. Our coastal resiliency certainly could be compromised. One can picture pieces of one or more structures that are the size of an 84 story skyscraper crashing onto our CCNS protected ocean beaches, or perhaps killing people and animals as well as further destroying the environment.

⁷ <https://www.wgbh.org/news/local/2024-08-08/environmental-concerns-a-closer-look-at-vineyard-wind-turbine-debris>

⁸ <https://justthenews.com/politics-policy/energy/testimony-offshore-wind-hearing-reveals-us-could-experience-48-blade>

Cable Road Path Proposal

June 27, 2025

Superintendent Jennifer Flynn
Cape Cod National Seashore
99 Marconi Site Road
Wellfleet, MA 02667

CC:

Richard Delaney, Chair, Cape Cod National Seashore Advisory Commission
Paul Lagg, Community Development Director/Town Planner, Town of Eastham

Dear Superintendent Flynn,

As Cape Cod National Seashore abutters, we are writing to submit our formal opposition to the proposed Cable Road Multi-Use Path on Cable Road in North Eastham. While presented as a benign infrastructure improvement, this path represents a precedent-setting development that risks undermining the ecological integrity, legal protections, and public trust that define the Seashore. We urge the National Park Service (NPS) to abandon this proposal and refrain from pursuing any similarly disruptive alternatives.

We think this proposal contradicts the intent of the Cape Cod National Seashore Act of 1961, which allows only for infrastructure that is essential to resource protection or public use that does not impair the land's character. A paved or graded multi-use path from Nauset Road and Nauset Regional High School to Nauset Light Beach – through an otherwise minimally disturbed corridor – is neither essential nor justified under the Seashore's enabling legislation.

No evidence has been presented to show that the Nauset Light Beach parking lot is routinely and consistently at capacity during the defined beach season (typically late June through Labor Day, when lifeguards are on duty). Nor has the Park Service provided any data on how many visitors actually walk from Nauset Regional High School's parking lot to Nauset Light Beach. This data void is critical: absent real and recurring overuse problems, this path appears to be a solution in search of a problem. Even if the Nauset Light Beach parking lot does reach capacity regularly during peak season, this fact alone does not justify the construction of a permanent, year-round multi-use path. The defined beach season runs only from late June through Labor Day – roughly 10–11 weeks out of the year. Building a path with permanent environmental and aesthetic consequences to solve a short-term seasonal access issue represents poor policy. The long-term damage to the local environment, the precedent it sets for further development, and the year-round maintenance burden on the Park Service outweigh any limited gains in access convenience during high-traffic weekends.

Given the ecological sensitivity of the area, this project raises serious regulatory and conservation red flags, including:

- Disruption of an otherwise natural landscape;
- Introduction of invasive species through increased human and bike traffic;
- NEPA compliance vulnerabilities – a full Environmental Impact Statement (EIS) should be required, not a lesser Environmental Assessment;
- Potentially the lack of transparent engagement with the Massachusetts Historical Commission under Section 106 of the National Historic Preservation Act.

We also wish to formally log a concern regarding the extremely limited 15-day public comment period (June 26–July 10, 2025). For a project with permanent ecological implications and substantial community interest, this timeline is inadequate and unjustified. This accelerated process appears designed to limit meaningful input rather than encourage it. A longer public engagement window of 30 days or more would be far more appropriate, transparent, and aligned with the public trust obligations of the Park Service.

These procedural shortcuts only increase skepticism toward the project and its proponents, while exposing NPS to potential administrative challenge. With the current federal administration emphasizing cost containment and government efficiency, it is perplexing that the NPS would allocate resources toward a paved corridor that:

- Duplicates existing access infrastructure;
- Lacks demonstrated necessity;
- Introduces long-term maintenance obligations (storm damage, debris and foliage clearance and trimming, etc.);
- And, critically, has not undergone comparative alternatives analysis, such as improved shuttle services, timed-entry policies, or managed seasonal access.

Once a paved or constructed path is introduced within a protected corridor, it becomes exceedingly difficult to resist further encroachments including wider paths, service access, restrooms, or commercial services. Even if this project is approved under narrow justifications, its presence would functionally redefine Cable Road and surrounding land as a multi-modal recreational corridor, not a preserved passage.

There is no “un-paving” this landscape once the intrusion is made. And there is no credible argument that this project is consistent with the long-term vision of the Cape Cod National Seashore.

We respectfully request that the National Park Service:

1. Re-consider the Cable Road Multi-Use Path proposal in its entirety;
2. Commit to no alternative access infrastructure that would replicate the same ecological, aesthetic, and legal concerns;
3. Publicly release visitor traffic data for Nauset Light Beach, including parking utilization and walking traffic from Nauset Regional High School, as well as all environmental assessments, alternatives analyses, and projected maintenance costs related to the path;

4. Reaffirm the Seashore's mission by pursuing low-impact access strategies when truly necessary and publicly justified;
5. If – and only if – data clearly supports the need for expanded access, pause to evaluate low-impact alternatives, such as seasonal shuttle service, modeled after successful systems already in use at Coast Guard Beach, or timed-entry models;
6. Reopen or extend the public comment period to allow for more comprehensive input from residents, conservation experts, and affected community groups.

The reference during the NPS virtual presentation on this proposal also referred to a future “parking lot,” basically just east of the existing Nauset High School parking lots. That concept is premised apparently on continued erosion at the current Nauset Light beach parking lot, and echoes the Coast Guard beach Little Creek shuttle service currently available a mile away. It would seem much more cost effective and environmentally prudent to negotiate with the Nauset regional public school system to allow shuttle service from the existing lots, rather than disrupting the ecology even more dramatically. There are occasions when classes of Nauset High School students walk along Cable Road to Nauset Light beach for a variety of educational or recreational purposes. Obviously, their safety is paramount. Perhaps, the district would rather some shuttle capability, a system that could readily serve both the high school and the Park Service.

Thank you for the opportunity to comment on this proposal. We remain confident that the NPS – when guided by its founding charter and obligation to public trust – will recognize that the long-term risks outweigh any short-term convenience the Cable Road Multi-Use Path is intended to provide.

Best regards,

John and Julie Durney
825R Cable Rd
North Eastham, MA 02651
jimmdurn@aol.com
508-255-7227

Kevin J. and Katherine K. Macdonald

675R Cable Road, Eastham, MA 02642

22 Jefferson Road, Wellesley, MA 02481

July 7, 2025

Superintendent Jennifer Flynn

Cape Cod National Seashore

99 Marconi Site Road

Wellfleet, MA 02667

CC:

Richard Delaney, Chair, Cape Cod National Seashore Advisory Commission

Paul Lagg, Community Development Director/Town Planner, Town of Eastham

Dear Superintendent Flynn,

We are abutters (675Rear, Cable Road, Eastham) to the Cape Cod National Seashore and the proposed Multi-Use Path on Cable Road, Eastham, Massachusetts. In addition, we attended the Team's online meeting on Thursday, June 26, 2025.

We support the concept called Transportation to provide a safe passage from Nauset Regional High School along Cable Road to Nauset Light Beach (NLB) for the following reasons:

- People parking at the Nauset Regional High School (NRHS) or students and those walking to NLB will likely use the most direct route.
- The beach-going public wants to get to the beach as soon as possible. Students have limited time in class to complete their school project and get to the beach and back to school.
- This concept is the least invasive to the habitat of the woodlands it passes through.
- For most of its length, the path will be in land, or abutting land, already owned by the Cape Cod National Seashore (CCNS).
- For the section of the pathway from the high school to approximately K-Street, a model for this route exists in the section already completed from Nauset Light to the driveway at #805 Cable Road. That existing pathway is approximately 20 feet from the North side of Cable Road, shaded on both sides by trees, with a grass barrier segregating it from native plants, such as

poison ivy. The design of the slightly meandering pathway is both aesthetic and interesting for walkers, yet it remains a direct path to NLB.

- The section of the Transportation concept that will be adjacent to Cable Road is directly in front of 695 Cable Road, Map 23, Parcel 40 for approximately 300 feet. The pathway then connects through the Three Sisters path.
- By using the already owned 9 foot right-of-way, from the north side of Cable Road: a sidewalk measuring 4 feet wide (521 CMR 22.00: Walkways), with a grass tree lawn of 3 feet on the road side, and 2 feet on the north side of the sidewalk is possible, which would provide a buffer from Cable Road traffic and screen the property at 695 Cable Road. When the construction of a guest cottage was approved, the Site Plan Approval from the Eastham Planning Board (Reference #PB2018-19), dated October 17, 2018, included a provision that the owner would restore the landscape between the property and Cable Road. When completed, it would provide additional screening between the sidewalk and the property.
- To accommodate the transition between the pathway and the sidewalk in front of 695, a telephone pole (age 50+ years) will need to be relocated.
- The Transportation concept does not excessively encroach on the habitats of foxes, coyotes, deer, turkeys, and other animals in the adjacent woods.

We are opposed to the Recreation concept for the following reasons:

- A multi-use trail (bicycles) would most likely not be used. The cyclists who use Cable Road are biking for exercise and are unlikely to divert to a recreational trail. The other population of bikers are families with children going to NLB and will take the most direct route.
- There are no facts supporting the need for the concept of a trail experience that goes deep into the woods behind existing residences in this area.
- The woods north of Cable Road do not offer the scenic overlook or ocean views that are part of the trail from Salt Pond to Coast Guard Beach.
- People parking at NRHS as overflow for the parking at NLB, or students and those walking to the beach, will take the most direct route.
- Beach goers often have beach equipment, i.e. chairs, strollers, tents, umbrellas, and coolers. They would want to take the most direct route to the beach.
- Once on the trail, people will look for direct access to NLB and cut through to get back on Cable Road at the point where the path turns north through the woods.
- This concept would result in a greater disruption of the woodland habitat of deer, coyotes, foxes, turkeys, and other animals.

- The recent construction of the new Nauset Light Beach Road (which we supported) has already removed a large section of the woodland habitat in this area, east and northeast of the Three Sisters Lights.
- This concept would further restrict hunters to the woodlands.
- The trail would provide greater access to secluded cottages on K-Street, where prior problems with theft and drinking on the property have occurred.

We respectfully request that you select the Direct Trail (Transportation) option as it is both more likely to be used and less disruptive to the woods along Cable Road.

Sincerely

Katherine K. Macdonald

Kevin J. Macdonald

Enclosed: Site Plan Approval from the Eastham Planning Board (Reference #PB2018-19)



TOWN OF EASTHAM

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All departments 508-240-5910 • Fax 508-240-1291
www.eastham-ma.gov

COMMONWEALTH OF MASSACHUSETTS TOWN OF EASTHAM PLANNING BOARD DECISION

695 CABLE ROAD MAP 23, PARCEL 40

CASE NO. PB2018-19
OWNER: Gleeson Family Trust
APPLICANT: Denis and Deborah Gleeson
17 Gregg Road
Nashua, NH 03062
HEARING DATE: October 17, 2018 **DECISION DATE:** October 17, 2018
FILING DATE: October 26, 2018

At a public hearing held on October 17, 2018 the Town of Eastham Planning Board, acting in the matter of Case No. PB2018-19 **VOTED to GRANT SITE PLAN APPROVAL - RESIDENTIAL** under Town of Eastham Zoning By-Laws Section XIV, Residential to construct a new guest studio in District F: Seashore in excess of 100 sf.

Plans Reviewed:

“Site Plan Showing Proposed Studio” prepared for Denis G. and Deborah A. Gleeson by East Cape Engineering, Inc., dated 8/2/18, scale 1” = 30’.
“Gleeson Studio” sheets 1-7, prepared by Method Architecture Studio, dated 8/8/18, scale as noted.

Findings of Fact:

1. The property is located at 695 Cable Road (Map 23, Parcel 40) and is located in District F (Seashore).
2. The applicant has applied for Site Plan Approval – Residential pursuant to Eastham Zoning By-Law Section IX D.4 (Residential Lot Intensity) and Section XIV (Site Plan Approval – Residential) to construct a new guest studio in District F: Seashore in excess of 100 sf.
3. The lot size is 45,215 sf.
4. The proposed site coverage is 3,424 sf (8%) and represents a 3% expansion.
5. Representatives from the National Seashore were contacted. The Planning Board was made aware of concerns regarding the potential use of the accessory structure as a separate dwelling unit. Conditions to mitigate this issue have been recommended.
6. The proposed project does not impact existing native vegetation and soil or grade changes.
7. The proposed project does relate harmoniously to the terrain and to the use, scale and proportions of existing and proposed buildings in the neighborhood.
8. The prevailing characteristics of the neighborhood are preserved by the plan as presented.

9. The proposed project does avoid impact on steep slopes, flood plains, hilltops, dunes, scenic views and wetlands.
10. The proposed project does not have existing unique or significant environmental resources.
11. The proposed site plan does maximize the convenience and safety of vehicular and pedestrian movement within the site and in relationship to adjacent ways.
12. Three abutters appeared in opposition to the proposal and six letters were received in opposition to the proposal.

A MOTION by Joe Manas to approve the findings of fact as stated, **seconded** by Craig Nightingale.

In favor: Woodson, Manas, Stahl, Autorino, Weston, Hobbs, Nightingale

Opposed: None

The VOTE: 7-0

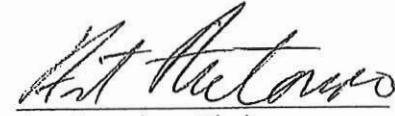
Motion passed – Unanimous

A MOTION by Craig Nightingale to **GRANT** Site Plan Approval - Residential for Case No. PB2018-19 with the following **conditions**:

1. No building permit shall be issued until the application complies with all pertinent sections of the Town of Eastham Zoning By-law.
2. The applicant shall obtain a building permit from the Eastham Building Department prior to the start of the project.
3. The applicant shall verify bedroom count and septic design for adequacy with the approved plan with the Eastham Health Department and if necessary obtain Board of Health approval prior to the start of construction.
4. All exterior lighting shall be shielded to prevent light spill onto adjacent properties.
5. No kitchen facilities shall be installed in the accessory structure.
6. The accessory structure shall not be rented separately from the main dwelling.
7. The accessory structure shall not be used as a separate dwelling unit.
8. The applicant shall submit a revised floor plan for the accessory structure indicating a 48" wide opening for the area labeled as "art studio" and shall submit revised plans for the main dwelling indicating the elimination of one bedroom with a 48" wide opening.
9. If the property is to be rented, the owner shall obtain a rental permit from the Eastham Health Department and comply with all pertinent rental regulations including allowing periodic inspections.
10. Any changes to the project site plans dated 8/2/18 the building plans dated 8/8/18 except those that are de minimis must be reviewed by the Planning Board. If the Board finds a change to be substantial, re-notice is necessary for a new hearing.
11. Any changes to final grade must be reviewed by the Planning Board.
12. The Planning Board reserves the right to monitor the ongoing construction for compliance with the approved plan.
13. The applicant will improve the site line for entering and exiting the driveway.
14. The applicant will provide additional screening to shield the parking area from Cable Road.
15. The applicant will provide a landscape plan prior to the issuance of a building permit.
16. The applicant will provide additional screening along the property line abutting the Three Sisters Lighthouses.

Seconded by Marc Stahl

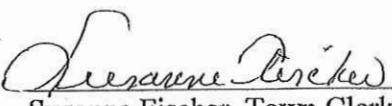
In favor: Woodson, Manas, Stahl, Autorino, Weston, Hobbs, Nightingale
Opposed: None
The VOTE: 7-0
Motion passed – Unanimous



Art Autorino, Chair
Eastham Planning Board

THIS DECISION HAS BEEN FILED WITH TOWN CLERK IN ACCORDANCE WITH EASTHAM ZONING BY-LAWS SECTION XIV. APPEALS TO THIS DECISION MAY BE MADE BY ANY PERSON AGGRIEVED PURSUANT TO M.G.L. CHAPTER 40A BY FILING SAID APPEAL WITH THE TOWN CLERK WITHIN TEN (10) DAYS OF THE DATE THIS DECISION WAS FILED.

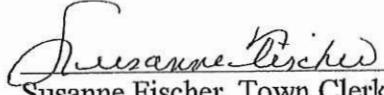
Date Filed: October 26, 2018



Susanne Fischer, Town Clerk

This is to certify that ten (10) days have elapsed after this decision was filed and no appeal has been filed.

Date: November 8, 2018



Susanne Fischer, Town Clerk

This is to certify an appeal has been filed within ten (10) days of filing this decision.

Date: _____

Susanne Fischer, Town Clerk