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Ref: Docket No. BOEM-2011-0005
Call for Information and Nominations for Commercial Leasing for Wind Power on the
Outer Continental Shelf Offshore New Jersey

I am a professional mariner who has frequently transited this area as Master and Mate of large ocean going vessels. Presently, I am a professional pilot working with many mariners who routinely transit this area, a member of the Mariners' Advisory Committee for the Bay and River Delaware, and a member of various working groups developing new offshore routes to accommodate anticipated wind turbine construction. These proposed offshore routes are included on the attached graphic showing the NJ Call area. I expect that these proposed routes will be presented in response to the ongoing Port Access Route Study (PARS) issued by the U.S. Coast Guard in the Federal Register Volume 76 No. 91 May 11, 2011 and republished in the Local Notice to Mariners District 5 Week 20, 2011. There are several conflicts with the "Call Area" as detailed below:

1. The depicted "Proposed Routes" are a compromise on the part of many professional mariners to allow for safe navigation around areas that will be congested with wind turbine structures. Presently, commercial vessels proceed on the most direct routes to their ports of call. The proposed routing measures that go around this "Call Area" will entail, in many cases, greater distances of travel. This is especially true in the area between the East end of the existing Five Fathom Traffic Separation Scheme (TSS) to the area off of the Brigantine Shoal buoy "WR2" where many tug/barge units presently transit on direct courses. With this call area filled with structures, they will have to transit through the proposed Two-Way Route described on the attached graphic as "Proposed Two-Way Route Chesapeake Bay to New York".
2. All proposed routing measures will strongly recommend a 0.5 Mile buffer on both sides to be clear of any permanent structures including wind turbines. Large ocean-going vessels, especially tug/barge units, need extra room that is free of any permanent structures to safely navigate in rough open sea conditions. This is a compromise that many professional mariners I consulted with, have seriously debated.

3. The 8.0 nm radius circular Proposed Precautionary Area off Atlantic City and the 0.5 nm side buffer conflict with lease blocks 6740, 6790, 6840 sub-block A, **which should not be considered for leasing.** This Proposed Precautionary Area will be a main confluence point for traffic entering and leaving New York Harbor from the South, as well as traffic transiting from/to the Five Fathom TSS to the East and North. It is anticipated that this proposed Precautionary Area will be very active, necessitating a very large area as shown on the graphic.

4. The Proposed TSS between the Proposed Atlantic City Precautionary Area and the Proposed Precautionary Area off the Five Fathom TSS, and the required side buffer conflict with lease blocks 7084 sub-block L&O, 7134 sub-block B&E, 7133 sub-blocks L&O, part of 6032 and part of 6081, **which should not be considered for leasing.**

5. The Proposed "Two-Way Route between Chesapeake and New York" with side buffer conflicts with lease block 7030 sub-blocks B,E,F,I,J,M&N and a portion of lease block 7080, **which should not be considered for leasing.**

6. This entire area is very active with various types of commercial marine traffic. Everything that can be done to insure the safety of all concerned is extremely important. Contact with the Mariners' Advisory Committee for the Bay and River Delaware and the Harbor Safety Committee for New York Harbor at all stages of leasing and construction is highly recommended.

Thank you for the opportunity to comment of this "Call" area. I look forward to further discussion on these important matters.

Sincerely,


Captain William A. Broadley

Attachment: Graphic of NJ Call Area with Proposed Routes and Precautionary Areas

NJ Call Area

Proposed Routes and Precautionary Areas

