

U.S. Department of
Homeland Security

United States
Coast Guard



Commander
Fifth Coast Guard District
431 Crawford St.
Portsmouth, Va. 23704-5004

Staff Symbol: (dpw)
Phone: (757) 398-6230
Fax: (757) 398-6303
Email: john.r.walters@uscg.mil

16003
June 28, 2010

Minerals Management Service
Office of Offshore Alternative Energy Programs
381 Elden Street, Mail Stop 4090
Herndon, Va. 20170

Dear Sir or Madam:

The following comments are provided in response to Docket No. MMS-2010-OMM-0017, Commercial Leasing for Wind Power on the Outer Continental Shelf (OCS) Offshore Delaware-Request for Interest, 75 FR 21653:

a. A charted "Danger Area" exists in the most western part of the area of interest on NOS chart 12214. Within the area of interest, the Danger Area can be defined as bordered on the north by the southern edge of the Cape Henlopen to Five Fathom Traffic Lane, on the west by the eastern arc of the Precautionary Area, on the southwest by the northern edge of the Delaware to Cape Henlopen Traffic Lane, on the east by longitude 74-49.85W and on the south by latitude 38-41.0N. Note B reads, "DANGER AREA...Area is open to unrestricted surface navigation but all vessels are cautioned neither to anchor, dredge, trawl, lay cables, bottom, nor conduct any other similar type of operation because of residual danger from mines on the bottom." The "DANGER AREA" will either require exclusion from the area of interest or other mitigation efforts incorporated into development of the ocean bottom to ensure the "bottom" is clear of all mines and other potential explosion hazards.

b. The Coast Guard anticipates creating an anchorage ground within the area of interest, east of the Delaware to Cape Henlopen Traffic Lane, defined as the area enclosed by the following points: 38-40.9N 74-52.0W, 38-40.9N 74-48.8W, 38-37.6N 74-48.5W. Authority to create anchorage grounds beyond 3NM is included in the Coast Guard Authorization Act language, currently pending congressional action. We request this area be excluded from consideration for development.

c. The RFI contains language indicating an initial buffer of 500 meters from the edge of a traffic lane. Since the RFI was published in the Federal Register, this buffer has been discussed within the Coast Guard and it is possible, that a 0.5NM buffer would be more appropriate. It should be borne in mind that shallow draft traffic may transit outside of a Traffic Separation Scheme (TSS) to avoid meeting deep draft or faster traffic. Before deciding if this buffer should increase in width a study should be conducted to determine actual tracklines of vessel traffic to determine the consequences of funneling all traffic into the traffic lanes. Currently there is no requirement for traffic to use the lanes however, once renewable energy infrastructure is built within the area of interest, the consequence will be a consolidation of marine traffic into the lanes, increasing the potential for collisions. This potential impact requires study to understand any unintended consequences of placing renewable energy infrastructure within the area of

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interest. If traffic density increases, it may be necessary to increase the width of the traffic lanes. If simulation can help understand the impacts of "closing" the area of interest to shipping, it should be pursued. If/when the area of interest is developed an effect will be the diversion of traffic to the traffic lanes. We should be prepared to recognize when that happens with the resultant impact. Until now, there has been no need to establish Vessel Traffic Services (VTS) in the approaches to Delaware Bay. If the result of energy development in the area of interest is an increase in traffic density, traffic mix or an increased risk of collision the cost of establishing a VTS should be considered in the cost/benefit analysis.

d. Once wind energy is developed in the area of interest, a means of delivering the energy to shore will require construction which will result in crossing both inbound and outbound traffic lanes. The transmission cable will need to be buried and engineering analysis will be necessary to determine the optimum depth that will ensure complete protection of the cable from dropped/dragging ships' anchors.

e. Additional information is needed to determine traditional shipping routes. There is value in reviewing the unique attributes of specific areas of interest, however, with the U. S. Maritime Administration's initiative for Short Sea Shipping and in the context of Effective Coastal and Marine Spatial Planning, it is a potential major oversight to examine/review individual areas of interest while excluding from review adjacent areas of interest, understanding that the Maryland and New Jersey areas of interest have not yet been advertised in the Federal Register. In a holistic review, it may be appropriate to create Shipping Safety Fairways and/or Fairway Anchorages as authorized in the Ports and Waterways Safety Act between the east coast ports.

If additional information or discussion is necessary, please contact Mr. John Walters at (757) 398-6230, or john.r.walters@uscg.mil.

Sincerely,



B. L. DUNN
Commander, U.S. Coast Guard
Chief, Waterways Management Branch
U.S. Coast Guard
By direction

Copy: COMDT (CG-553)
CCGDONE (dp)
COGARD SECTOR Delaware Bay
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