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February 5, 2011

Ref: Docket No. BOEM-2010-0075
Request for Competitive Interest (RFCI) in proposed Lease Area off Delaware

I am a professional mariner who has transited this area as Master and Mate of large ocean going vessels many times. Presently, I am a professional pilot who works 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 a working group that is developing offshore routes with American Waterways Operators. The following are some comments concerning this RFCI.

1. This is a very busy area for commercial traffic, so everything that can be done to insure the safety of all concerned is extremely important. Any potential lease holder should be required to participate with the local commercial maritime community through the Mariners' Advisory Committee for the Bay and River Delaware at all stages of the planning, construction, and operation of this project.
2. An area of this RFCI has been designated as a "Potential U.S. Coast Guard (USCG) Anchorage Area". Although this is designated as a potential anchorage area, it should be noted that many areas within this RFCI are presently being used as unofficial anchorage areas. There is a definite need for a designated anchorage within this area so no leases shall be permitted in this area.
3. This BOEM mentions in this RFCI that it will study vessel traffic data for vessels equipped with AIS transponders before requiring a greater than 500 meter buffer area between the Traffic Separation Zones and any permanent structures. First, any buffer area should also include the "Potential USCG Anchorage Area".

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Second, AIS data is only part of the story. AIS will only show history and will not show what the professional mariners will have to contend with when they are navigating very large vessels through these "Traffic Separation Zones" with only a 500 meter buffer area. There is a very pertinent safety reason why the ½ mile buffer was introduced by the Coast Guard and it must be retained. Before this buffer area can be reduced to 500 meters, this must be further studied, not by just looking at historical AIS data, but by also utilizing computer simulation with all potential factors, including heavy sea conditions, heavy concentrations of fishing and recreational vessels, and reduced visibility scenarios. 500 meters may seem to be a lot of distance, but from the bridge of a large ship trying to navigate through a relatively narrow Traffic Separation Zone, 500 meters is a very small distance.

Thank you for the opportunity to comment on this RFCI. I look forward to further discussion on these important matters.

Sincerely,



Captain William A. Broadley