



Resource Access International, LLC

P.O. Box 241
Cambridge, MD 21613
P 410 221 8100

February 9, 2011

Bureau of Ocean Energy Management, Regulation and Enforcement
Office of Offshore Alternative Energy Programs
381 Elden Street, Mail Stop 4090
Herndon, Virginia 20170-4817.

Re: Request for Competitive Interest (RFCI) in Proposed Lease Area off of Delaware

Please accept these comments in response to a RFCI associated with a wind energy lease area proposed seaward of Delaware state waters and the entry to Delaware Bay.

The surf clam/ocean quahog fishery is one of the most established and sustainably managed fisheries on the eastern seaboard. These shellfish are harvested from fishing grounds extending from Virginia to Massachusetts, typically in waters between 30 meters and 80 meters depth. The clam fishery is most likely to occur in substrates ranges from high-energy sand environments to sand-gravel-shell environments, habitats which predominate throughout the proposed lease area.

Harvesting is done by vessels 30 to 50 meters in length; catcher vessels typically employ a hydraulic dredge which is towed across the sea floor behind the vessel. A manifold on the leading edge of the dredge directs a stream of pressurized water into the substrate ahead of the dredge, temporarily "liquefying" the tow path. The dredge, followed by a steel collection cage, travels through this sand/sand-gravel substrate, recessed into the sea floor by 0.5 to .75 meter depth, sieving out the largest mollusks.

Because surf clams and ocean quahogs are slow-growing shellfish, sustainable fishing practice requires harvesters to disperse their efforts in order to avoid overfishing an area; typically, shellfish habitat is worked for a period and then allowed to lay fallow. All of the lease blocks being considered in this RFCI have been subject to surf clam/ocean quahog harvesting in the recent past and will see periodic fishing activity in the coming years. Clams that have been taken from the proposed lease area were worth millions of dollars. The resource inhabiting the proposed lease area is expected to generate tens of thousands of bushels of clams in the future.

Principle landing ports for surf clams and ocean quahogs in the Delmarva region are Ocean City, MD, Atlantic City, NJ, and Cape May, NJ. The approximately 20 of catcher vessels berthed in these three ports are dependent on access to the proposed lease area off of Delaware, and other lease areas proposed for waters outside of Maryland and New Jersey. A large clam processor maintains a processing facility in Delaware which is the principle shucking plant for surf clams and ocean quahogs, buying from harvesters throughout the region. This facility contributed tens million dollars in revenues to the Delaware economy and hundreds of jobs.

Overall, the surf clam/ocean quahog industry, with harvesting and processing combined, ranging from Maryland to Maine, generates on average \$75 million annually.

Our concern is that any wind power generating facilities permitted in this proposed lease area will result in effectively denying surf clam/ocean quahog harvesters' future access to the shellfish resource in the area subject to development. There are four ways that this will happen:

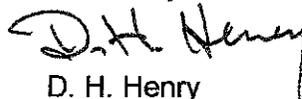
- The cumulative footprint of turbine towers and rip-rap buffering will represent a significant loss of habitat to these shellfish;
- Insurance coverage for fishing vessels operating near wind turbine towers will be prohibitively expensive or impossible to obtain; and
- In the dynamic marine environment of the lease area, buried transmission cables will be unpredictably exposed to hydraulic dredge activities due to seafloor scouring by ocean currents.
- Exclusion zone placed around each wind turbine will deny the right to fishing in the entire area.

Finally, of necessity, catcher vessels already avoid harvesting activities in the USCG Traffic Separation Scheme approaches to Delaware Bay as a matter of vessel safety. If this proposed lease area and other proposed lease areas are developed for wind power in the future, it will have the net effect of forcing fishing activities into the high-traffic lanes of the USCG TSS, jeopardizing lives and property.

There is reason to hope that offshore wind power development and high-value fisheries can co-exist compatibly. To date however, the process for determining if and how that can be accomplished has been obscure, to the point of needless exclusion of existing industries which place high importance on access to this marine environment. This must not continue. We strongly urge the Bureau of Ocean Energy Management, Regulation and Enforcement to amend its lease process in the several states from Virginia to Maine where wind power development is most likely to occur, to adopt a much more comprehensive approach including greater consultation with NOAA Fisheries, the Mid-Atlantic and New England Fishery Management Councils, and representatives of relevant fishing industries.

Thank you in advance for considering our comments.

Sincerely,



D. H. Henry
RAI, LLC