U.S. Department of Homeland Security

United States Coast Guard

Commander
First Coast Guard District

408 Atlantic Avenue
Boston, MA 02110-3350
Staff Symbol: dp
Phone: 617-223-8439
Fax: 617-223-8094

16670/ 15-035
September 28, 2015

Bureau of Ocean Energy Management (BOEM)
Office of Renewable Energy Programs
VAM-OREP
45600 Woodland Road, Sterling, VA 20166
Attn: Dr. Andrew Krueger

Dear Dr. Krueger,

Thank you for the opportunity to participate in the Area Identification (AREA ID) step in the New York Wind Energy Area (NY WEA) competitive lease process. First Coast Guard District (CGDONE) is pleased to serve as a subject matter expert to the BOEM regarding impacts to navigation and the marine environment, under the authority of the Ports and Waterways Safety Act (PWSA), 33 U.S.C. § 1231, and the Rivers and Harbors Act, 33 U.S.C. § 471.

CGDONE, with input from Coast Guard Sector New York (SECNY), Coast Guard Atlantic Area (LANT-544), and Coast Guard Headquarters (NAV-2), USCG collectively hereafter, evaluated the NY WEA to assess what impacts the currently defined proposed lease area will have on the maritime environment, navigational safety, and the USCG's ability to maintain mission readiness. This evaluation should be considered in your analysis as a supplement to comments already submitted by NAV-2 on October 21, 2011, and SECNY on March 8, 2013.

The installation of any towers, turbines, transmission cables, or electrical substations will complicate navigational safety through the increased presence of construction traffic and permanent structures in waters. The proposed NY WEA is between two Traffic Separation Schemes (TSS) at the entrance to the Port of New York and New Jersey. This waterway supports a diverse population of vessels and industries. Navigating in New York Bight is complicated by a number factors including, but not limited to: vessel size, diverse vessel types, traffic density, and prevailing weather conditions.

Given that the NY WEA is still in the planning stages, the USCG gathered additional information about the area and engaged stakeholders on the potential impacts the proposed NY WEA will have on existing users of the waterway. On January 21, 2015, the USCG convened a meeting with affected maritime industry representatives to discuss navigational concerns regarding the AREA ID process. There were 24 participants representing federal, state, and local government as well as industry, such as shipping and towing companies that transit in a TSS near the proposed NY WEA. The prevailing concern was whether vessels would have sufficient sea room to transit and maneuver, especially in case of an emergency, equipment failure, or foul weather conditions requiring departure from the TSS.

To assist our evaluation, the USCG also sought information on how countries with offshore wind projects review proposals to minimize interference with shipping routes. As a result of this research, USCG has developed draft Marine Planning Guidelines (MPG) which, once finalized,

will assist offshore developers and marine planners with evaluating how permanent structures will impact navigational safety. The MPG are not mandatory nor are they regulations. Additionally, the MPG should be a key input into the Navigation Safety Risk Assessments (NSRA) to be conducted by developers of an area, once leased. The USCG offers the MPG as a level of review in a refining process since each project is unique and requires individual review and consultation.

Using the draft MPG, the USCG recommends placing permanent structures at least 2 NM from the outer edge of a TSS and 5 NM from the entry/exit of the Hudson Canyon to Ambrose TSS and the Ambrose to Nantucket TSS, see Enclosure (1). This should provide a safe distance for large vessels (greater than 300 meters in length) to maneuver in compliance with COLREGs, and to stop or anchor in emergency situations. However, it is possible that the risks can be mitigated to reduce the minimum distance through further consultation, analysis of vessel casualty data, and development of mitigation strategies that support safe navigation as identified in a NSRA.

Providing input to the AREA ID does not imply that the USCG approves or disapproves the NY WEA as currently defined. Finally, the USCG recommends continued outreach with maritime industry representatives and other affected stakeholders, and encourages holding a public hearing on the environmental analysis once the AREA ID is complete.

The Coast Guard appreciates the opportunity to comment and looks forward to our continued involvement as a cooperating agency as the process moves forward. Should you have additional questions in this matter, feel free to contact Mr. Dan L. Hubbard, Branch Chief for Maritime Energy and Marine Planning at Daniel.L.Hubbard@uscg.mil or 617-223-8372.

Sincerely,

B. L. BLACK
Captain, U.S. Coast Guard
Chief, Prevention Division

Enclosure: (1) USCG Risk Identification of the New York Wind Energy

Copy: Commandant, U.S. Coast Guard (NAV-3)
Commander, Coast Guard Atlantic Area (LANT-544)
Commander, Coast Guard Sector Long Island Sound (spw)
Commander, Coast Guard Sector New York (spw)

USCG Area Identification of the New York Wind Energy

Enclosure (1)

USCG Area Identification of the New York Wind Energy

The NY WEA has been evaluated using the USCG Marine Planning Guidelines (MPG). The MPG consider sea space necessary for ships to maneuver safely, and discuss other factors to be considered when determining appropriate separation distances for the siting of offshore structures near shipping routes. The MPGs are based on United Kingdom (UK) Maritime Guidance Note MGN-371.[1]

Some of the key distances from the MGN-371 shipping route template include:

- 1NM is the minimum distance to the parallel boundary of a TSS (HIGH/MEDIUM risk).
- 2NM is the distance where COLREGS become less challenging. (MEDIUM risk)
- >2NM risk becomes LOW, except near a TSS where risk would be higher. (MGN-371 does not state a distance where risk becomes LOW near a TSS.)
- 5NM is the minimum distance from the entry/exit of a TSS. (Assumed to be MEDIUM risk)

Below are the proposed lease area Outer Continental Shelf block numbers identified by risk level. Additionally, an image of what this might look like is included on Page 4.

Block Number	Sub Block	RISK
6655	F G H K L P	HIGH
6656	I J K L M N O P	
6657	M N	
6706	B C H	
6706	E J P	
6708	A B C D	
6709	F G H	
6710	J K L	
6711	N O P	
6712	M	
6758	A B G H	
6759	I J O P	
6762	B C D	
6763	A C D H	
6764	A E F G H I J K N	
6810	A G L	
6811	I O	
6862	E F H K	

[1] United Kingdom Maritime and Coastguard Agency (MCA) Marine Guidance Note MGN-371, Offshore Renewable Energy Installations (OREIs) - Guidance on UK Navigational Practice, Safety and Emergency Response Issues.

USCG Area Identification of the New York Wind Energy

Block Number	Sub Block	RISK
6656	O P	HIGH TO MEDIUM
6706	D	
6707	A B C D F G K L	
6708	E F G H I M N O	
6709	I J K L	
6710	I M N O P	
6711	M	
6758	C D	
6759	A E F K L	
6760	M N	
6761	B C D	
6762	A E F G H	
6763	E F G K L P	
6764	M	
6810	B C D H	
6811	E F J K L P	
6812	M	
6862	A B C D G	
6863	A	

Block Number	Sub Block	RISK
6707	H	MEDIUM
6708	J K L P	
6709	M N O P	
6759	B C D G H	
6760	A B C D E F G H I J K L O P	
6761	A E F G H I J K L M N O P	
6762	I J K L M N O P	
6763	I J M N O	
6811	A B C D G H	
6812	A B C D E F G H I J K L N O P	
6813	A B C D E F G H I J M N	

USCG Area Identification of the New York Wind Energy