



MARITIME EXCHANGE

for the Delaware River and Bay

Leading the Way to Port Progress

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January 4, 2011

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

Re: Docket No. BOEM-2010-0038 – Commercial Leasing for Wind
Power on the Outer Continental Shelf (OCS) Offshore Maryland

Sir or Madam:

Thank you for your invitation to submit comments to the above-referenced docket. For your information, the Maritime Exchange for the Delaware River and Bay is a non-profit trade association representing port and related public and private sector companies, organizations and agencies in the Delaware Valley region. As such, the Maritime Exchange is keenly interested in ensuring offshore projects are implemented in a way that takes into account the commercial maritime industry in the region while at the same time remaining sensitive to potential lease holders and the environment.

The Maritime Exchange is supportive of renewable energy initiatives and applauds BOEMRE for its efforts to engage with stakeholders as it considers new policies. We note, however, that it appears the BOEMRE Maryland Renewable Energy Task Force included only government officials; it is not immediately evident that BOEMRE communicated with commercial cargo carriers, pilots, or other mariners who regularly navigate through the Request for Interest (RFI) area as it formulated its renewable energy leasing decision. Moving forward, we would encourage BOEMRE to work with both public and private sector maritime stakeholders as it seeks to implement the Renewable Energy Framework.

In the meantime, we offer the following observations regarding the potential leasing for wind power in the RFI area.

First and foremost, the area outlined in the proposal is sited within the Traffic Separation Scheme leading into Delaware Bay. Approximately three-fourths of the nearly 5,000 commercial cargo vessel arrivals into/departures from the Delaware River port each year move through the southern sea lane included in the RFI area. Needless to say, if not thoughtfully placed, the introduction of offshore wind power equipment in this region may engender unnecessary impediments to vessel traffic and navigational safety.

This is not meant to suggest that there are no possible options to lease space for equipment in this general region. Certain of the proposed lease blocks might be utilized without conflict between the energy and maritime industries.

In order to make final determinations, however, BOEMRE should consider taking additional steps to ensure it can make an informed decision regarding lease blocks in the area.

For example, the Bureau should look to the Interagency Ocean Policy Task Force Framework for Effective Coastal and Marine Spatial Planning (CMSP) released in July of last year. As you are undoubtedly aware, CMSP “identifies areas most suitable for various types or classes of activities in order to reduce conflicts among uses, reduce environmental impacts, facilitate compatible uses, and preserve critical ecosystem services to meet economic, environmental, security, and social objectives.”

If this RFI area is to be utilized for offshore energy use, we suggest consideration be given to developing a CMS Plan for the region. Not only will this help ensure cooperation among all interested parties, it will significantly improve our collective ability to assess more long-term needs and should ultimately result in a more cost-effective, timely and safe implementation of any new projects in the mid-Atlantic region.

At a minimum, we suggest that the Coast Guard complete a Port Access Route Study for the area, sharing the information with the BOEMRE. Because of the nature of the information to be reviewed, it is clear the Coast Guard should take the lead on analyzing Automatic Identification system (AIS) data.

Information gleaned from further analyses should be made available for public review and comment prior to moving to the next stage.

Ultimately, we have a number of questions concerning the proposal and would welcome the opportunity for continued dialogue with BOEMRE and other policymakers. We request that BEOMRE join with other maritime stakeholders who will reconvene under a newly-created working group organized under the Mariners Advisory Committee for the Bay and River Delaware to further discuss the proposal.

Once again we thank you for the opportunity to provide comment. The Maritime Exchange and its members stand ready to work with your office to ensure the multiple and diverse array of activities within this region are managed in an integrated, collaborative and holistic fashion.

Sincerely,

A handwritten signature in black ink, appearing to read "Dennis Rochford", with a long horizontal flourish extending to the right.

Dennis Rochford
President