



**MARYLAND RESPONSE TO DEPARTMENT OF INTERIOR OFFSHORE WIND
REQUEST FOR INTEREST**

**Bureau of Ocean Energy Management, Regulation and Enforcement (BOEMRE)
Docket No. BOEM-2010-0038**

**Commercial Leasing for Wind Power on the Outer Continental Shelf (OCS) Offshore
Maryland – Request for Interest (RFI)**

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

January 10, 2011

Enclosed, please find comments to the BOEMRE Maryland RFI, Docket No. BOEM-2010-0038 from Maryland State agencies. Attached are consolidated comments from the Maryland Energy Administration and the Maryland Department of Natural Resources, as well as comments from the Maryland Port Administration.

Please note that these comments replace the earlier version inadvertently sent by the Maryland Port Administration.



**MARYLAND ENERGY ADMINISTRATION AND MARYLAND DEPARTMENT OF
NATURAL RESOURCES JOINT RESPONSE TO DEPARTMENT OF INTERIOR
OFFSHORE WIND REQUEST FOR INTEREST**

**Bureau of Ocean Energy Management, Regulation and Enforcement (BOEMRE)
Docket No. BOEM-2010-0038**

**Commercial Leasing for Wind Power on the Outer Continental Shelf (OCS) Offshore
Maryland – Request for Interest (RFI)**

MEA AND DNR Response to BOEMRE RFI in Commercial Wind Energy Leasing Offshore
Maryland, and Invitation for Comments from Interested and Affected Parties.

The Maryland Energy Administration (MEA) and Maryland Department of Natural Resources appreciate the opportunity to respond to the Bureau of Ocean Energy Management, Regulation and Enforcement (BOEMRE) Request for Interest in Commercial Wind Energy Leasing Offshore Maryland, and Invitation for Comments from Interested and Affected Parties (RFI). Development of offshore wind energy offers tremendous benefits to Maryland, including economic development and job creation, reductions in greenhouse gases and criteria pollutants related to our electricity supply, increased price stability, easing of constrained transmission in coastal areas, improvements in public health and progress toward meeting our State renewable energy goals.

Secretary Salazar's "Smart from the Start" initiative makes essential changes that streamline the permitting and leasing process for offshore wind energy, demonstrating the Department of the Interior's (DOI) commitment to making deployment of offshore wind a priority. We will continue to support these types of critical improvements moving forward through the Maryland BOEMRE State/Federal Offshore Wind Task Force as well as the Atlantic Offshore Wind Energy Consortium.

In 2010, Governor O'Malley joined with Delaware Governor Markell in reaching out to the Obama administration and federal agencies to secure federal support for regional offshore wind development in the form of long term power procurement. At the State level, we continue to explore ways to create long term demand for offshore wind power. We urge BOEMRE to engage with offshore wind developers in federal leasing in a way that is supportive of competitive procurement processes and that works to reduce costs of offshore wind power.

Maryland looks forward to our continued collaboration with BOEMRE and other partners to address known research and data gaps and implement practices to ensure the protection of our natural resources and the safety of the boating, fishing and shipping communities. We anticipate that, in addition to indications of interest from offshore wind energy developers, federal agencies and other important stakeholders will offer comments to this RFI that will provide valuable data and guidance for our marine spatial planning and offshore wind deployment efforts.

As BOEMRE reviews responses to this RFI, we look forward to providing consultation through the Maryland BOEMRE State/Federal Offshore Wind Task Force, as needed. We appreciate the diligence and responsiveness of staff at BOEMRE in conducting this phase of leasing and look forward to continued coordination of offshore wind energy development in the Mid-Atlantic.

If you have questions or concerns regarding these technical comments, please contact MEA Clean Energy Program Manager Andrew Gohn at agohn@energy.state.md.us or DNR Senior Coastal & Ocean Policy Advisor Gwynne Schultz at gschultz@dnr.state.md.us.



Maryland Department of Transportation
The Secretary's Office

Martin O'Malley
Governor

Anthony G. Brown
Lt. Governor

Beverley K. Swaim-Staley
Secretary

Darrell B. Mobley
Deputy Secretary

January 7, 2011

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

Dear Sir or Madam:

The following comments are provided in response to Docket No. BOEM-2010-0038, Commercial Leasing for Wind Power on the Outer Continental Shelf (OCS) Offshore Maryland Request for Interest (RFI), 75 FR 216.

The Maryland Port Administration (MPA) is an agency of the Maryland Department of Transportation (MDOT). The mission of the MPA is to "stimulate the flow of waterborne commerce through the State of Maryland in a manner that provides economic benefit to the citizens of the State." As such, the MPA develops and leases cargo facilities, provides for the dredging of the channels leading to and from the port and promotes the port nationally and internationally. The port is a major economic engine for the State of Maryland impacting over 50,000 jobs, 16,700 of which are direct jobs, in the State of Maryland and an annual economic benefit of \$5.6 billion.

The MPA owns seven marine terminals handling a variety of cargoes including containers, automobiles, roll-on/roll-off, forest products break-bulk and bulk cargoes. The Port of Baltimore plays a prominent roll in the commerce of the United States and the Mid-Atlantic region ranking number one in the nation for roll-on/roll-off agricultural and construction equipment and for imports of sugar, forest products and gypsum. In addition Baltimore ranks among the top three ports in the nation for imports of iron ore and aluminum, exports of coal and imports and exports of automobiles. As such, the efficient and safe movement of ocean going vessels in and out of the Port of Baltimore is crucial to the economy of Mid-Atlantic region as well as that of the United States.

The Port of Baltimore is fortunate to have two means of vessel access from the Atlantic Ocean – the Chesapeake Bay via the Virginia Capes and the Chesapeake and Delaware Canal (C&D) via the Delaware Bay. It is the vessels calling the Port of Baltimore via the C&D Canal that may be adversely impacted by the development of wind energy facilities, namely wind mills, within the areas proposed in this RFI and I offer the following comments in that regard.

Comprehensive Assessment of Wind Farms:

Several states along the East Coast have initiated efforts to develop wind farms. Within the Mid-Atlantic, sites off shore from New Jersey, Delaware, Maryland and Virginia are currently being considered for leasing and development of windmills to provide alternative energy. A request for interest has been made, and the comment period ended, for Delaware. Now it is Maryland's turn and presumably an RFI will be issued in the near future for proposed areas off the coast of Virginia at the entrance to the Chesapeake Bay. These potential lease areas cannot be looked at individually. The Bureau of Ocean Energy Management, Regulation and Enforcement (BOEMRE) must assess and evaluate all potential lease areas in the vicinity of the entrances to Delaware Bay and Chesapeake Bay comprehensively as they relate to one another and not individually nor on just a State by State basis to ensure that there are no adverse impacts to the competitiveness and efficiency of international and coastwise shipping.

Impact to Port of Baltimore Shipping:

As mentioned above, the Chesapeake and Delaware Canal is a means of vessel access to the Port of Baltimore. The east entrance to the C&D Canal is approximately 50 nautical miles north of the entrance to the Delaware Bay. The MPA estimates that approximately 20% of the Port of Baltimore's cargo tonnage moves through the C&D Canal. Between 2000 and 2008 C&D vessel transits to and from the POB ranged between 700 and 800 vessels annually. Vehicle carriers consistently comprised the greatest share of these transits at about one-third of the total, followed by tankers, bulk, general cargo and roll-on/roll-off vessels. The ability to efficiently access the C&D plays a significant role in the demonstrated effectiveness of the POB. Placing structures in navigable waters such as the lease areas germane to this RFI has the potential to constrict shipping and divert vessels from long established and efficient transit patterns thereby potentially increasing operating cost and affecting competitiveness. BOEMRE must demonstrate that the competitiveness and efficiency of the Port of Baltimore is not diminished by any action that would adversely affect navigation in and out of the port.

Impact on Shipping in General:

The lease areas proposed in this RFI are located immediately south of the vessel traffic lanes for Delaware Bay. In addition to Port of Baltimore vessel traffic, vessels calling ports along the Delaware River in Wilmington, Delaware and Philadelphia, Pennsylvania also navigate the proposed lease area. In 2009, over 66 million tons of cargo moved through the Philadelphia port district, of which 55 million tons were mineral fuels. Much of this vessel traffic enters Delaware Bay via its southern approach, the Delaware to Cape Henlopen Traffic Lane. The United States Coast Guard's analysis of vessel traffic demonstrates that this lane is heavily used and that since the proposed lease areas are

located immediately south and adjacent to the lane, essentially all of this traffic passes through the proposed lease areas. Placing energy generating equipment within the lease areas that could potentially conflict with shipping would pose a severe threat to the safety of vessels that navigate these established routes. BOEMRE must ensure that any development would not pose a risk to navigation that could result in harm to vessels or to the coast or impact shipping costs.

Impact on Coastal Traffic:

In addition to vessel traffic in and out of Delaware Bay, domestic and international coastal traffic could be affected as well by development in the lease area. Tugs, barges and vessels moving up and down the coast choose routings based on sea conditions, visibility, safety considerations including the presence of other vessels, and operating efficiencies. Some of these are small companies and reducing their routing options could impact their business. And, greater use of the nation's waterways, both inland and coastal, for the movement of freight is being encouraged by the Federal Government through the US Maritime Administration's America's Marine Highway Program. A successful program could funnel additional coastal vessels through this area. BOEMRE must take into account the potential for coastal vessel traffic growth and the need for this traffic to have safe and efficient routing alternatives available.

Conclusion:

The Maryland Port Administration is committed to operating in a cost effective and environmentally sensitive manner. As such, the MPA has established an environmental management program to ensure compliance and diligently explores new mitigation strategies to lessen the port's impact on the environment. Developing cost effective alternative energy sources is an important national and State goal. The MPA supports these initiatives and applauds the efforts of the BOEMRE to foster this resource. However, given the concerns expressed above and factors such as the growth of global trade, increasing vessel size and the corresponding private and public investment in facilities to accommodate these vessels, and the need for United States ports to compete effectively for trade, due consideration must be given to the need for efficient and safe commercial navigation and the potential for navigational conflicts that could result from placement of wind farms in the Maryland RFI area. Specifically, the blocks to the South and East of the traffic lanes, where vessel movements are the greatest, should be an area of focus given their importance to the shipping industry. The blocks to the West may provide less of a concern to navigation should they be developed into wind farms but further analysis should be conducted on the traffic that moves through this area.

Should you have any questions about our concerns, please call me (410-865-1001) or Mr. Stephen Frank, Manager for Market Planning, Maryland Port Administration (410-385-4473).

Sincerely,

A handwritten signature in cursive script, appearing to read "Beverley K. Swaim-Staley".

Beverley K. Swaim-Staley
Secretary

cc

James J. White, Executive Director, Maryland Port Administration
Malcolm D. Woolf, Director, Maryland Energy Administration