

U.S. Department of
Homeland Security

United States
Coast Guard



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16003
January 10, 2011

Bureau of Ocean Energy Management, Regulation and Enforcement
Office of Offshore Alternative Energy Programs
381 Elden Street, Mail Stop 4090
Herndon, Va. 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, 75 FR 68824:

a. The RFI contains language recognizing the RFI area lies adjacent to or in close proximity to a Traffic Separation Scheme (TSS) and that 22 nominated areas may need to be excluded. It should be recognized that shallow draft traffic may transit outside of a Traffic Separation Scheme (TSS) to avoid meeting deep draft or faster traffic. If the traffic that currently transits through blocks 6623, 6624, 6673, 6674, 6723, 6724, 6725, 6773, 6774, 6775 and 6825 will need to avoid those blocks once developed, the traffic will be forced to either merge with the traffic using the outbound traffic lane or sail closer to shore. That decision will be affected by weather, the depth of water/draft of the vessel and its destination. The Coast Guard recommends that the consequences of funneling the traffic into the traffic lane or closer to shore be identified. Currently there is no requirement for traffic to use the traffic lanes but once renewable energy infrastructure is built within the area of interest, the consequence will be a consolidation of marine traffic into the lane, increasing the potential for collisions. This potential impact requires study to understand or avoid the law of unintended consequences. If traffic density increases, it may be necessary to increase the width of the traffic lanes or modify its alignment. If simulation can help understand the impacts of reducing "sea room" to shipping, it should be pursued. If/when the area of interest is developed an effect will be the consolidation of traffic to the traffic lanes. We should be prepared to recognize when that happens with the resultant impact. Until now, there has been no need to establish Vessel Traffic Services (VTS) in the approaches to Delaware Bay. If the result of energy development in the area of interest is an increase in traffic density, traffic mix or an increased risk of collision/allision, the cost of establishing a VTS should be considered in the cost/benefit analysis.

b. Once wind energy is developed in the area of interest, a means of delivering the energy to shore will require construction of a transmission line that may or may not be combined with the state of Delaware's offshore renewable energy initiative. The transmission cable will require to be buried and engineering analysis will be necessary to determine the optimum depth that will ensure complete protection of the cable from dropped/dragging ships' anchors.

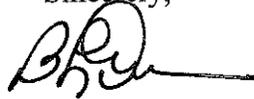
c. Additional information is needed to determine traditional shipping routes. Currently there is a dearth of information of where traditional shipping transits. There is value in reviewing the

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unique attributes of specific areas of interest, however, with the U. S. Maritime Administration's initiative for Short Sea Shipping, and in the context of Effective Coastal and Marine Spatial Planning, it is a potential major oversight to examine/review individual areas of interest while excluding from review adjacent areas of interest. The Delaware RFI has been published in the Federal Register however the Virginia and New Jersey areas of interest have not yet been advertised. In a holistic review, taking into consideration the RFI areas of interest for all of the mid-Atlantic states, it may be appropriate to create Shipping Safety Fairways and/or Fairway Anchorages as authorized in the Ports and Waterways Safety Act between the east coast ports.

If additional information or discussion is necessary, please contact Mr. John Walters at (757) 398-6230, or john.r.walters@uscg.mil.

Sincerely,



B. L. DUNN
Commander, U.S. Coast Guard
Chief, Waterways Management Branch
U.S. Coast Guard
By direction

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