

**Mariners' Advisory
Committee**
for the Bay & River Delaware

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Captain Stephen Roberts, Chairman
Captain H. Hickman Rowland Jr., Secretary

Organized 1964



Captain Rick Iulucci, Treasurer
Captain Joseph F. Bradley, Honorary Chairman

January 30, 2011

Captain Stephen A. Roberts, Chairman
Mariners Advisory Committee
28 Cripple Creek Run
Milton, DE 19968
mac.chair@comcast.net

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

**Delaware Notice of Proposed Lease Area and Request for Competitive Interest
Docket ID: BOEMRE-2010-0075**

Dear Sir or Madam:

I am a maritime pilot whose working area includes the sea lane approaches to the Delaware Bay and River. I am also the chairman of the Mariners Advisory Committee (MAC), the harbor safety committee for the ports on the Delaware River. The MAC is made up of pilots, captains, vessel owners and operators and other port related professionals. We work very closely with the United States Coast Guard, Army Corps of Engineers and NOAA in setting navigation safety standards for vessels transiting the Delaware River Basin.

The Port of Philadelphia is the nation's largest freshwater port, the largest oil port on the East Coast and third largest oil port in the country. As such, approximately 2500 deep-draft vessels transit the Delaware annually. Many are amongst the largest ships to arrive in any port in the United States with the majority approaching the area from the south using the Delaware to Cape Henlopen Traffic Lane.

240 Cherry Street, Philadelphia, PA 19106, (215) 925 1524
Administrative Assistant Scott Anderson marinersadvisory@yahoo.com
or visit our website www.macdelriv.org

While the MAC supports the construction of wind generation structures in this area, we do want to express our following concerns:

1. The area in question, located between the Traffic Lanes, East of a line from 38-31.0N 074-41.5W and 38-36.3N 074-47.1W adjacent to Delaware Traffic Lane Buoy "DA", has been used for years as an anchorage by deep draft commercial vessels waiting for berth in the Delaware River ports. The construction of towers will preclude ships from using this area as an anchorage and force them to anchor farther away from the entrance to Delaware Bay. The ramifications of this are twofold. First, if a ship misses its appointed transit arrival time due to the new anchoring location, substantial additional costs are incurred, not only for the Delaware River port call but at each subsequent port of call on the particular voyage. As information, it can cost tens of thousands of dollars per day to operate a ship with the cost increasing exponentially based on ship size and cargo type.

Second, and more importantly, there are increased safety risks to vessels, their crew and their cargo, associated with anchoring in deeper water with rougher seas rather than closer to land in shallower water.

2. The area proposed is often transited by smaller coastal traffic seeking shelter from strong westerly winds. The construction of towers in this area will force them farther offshore into heavier seas.
3. Docket No. MMS-2010-OMM-017 contains language concerning a 500 meter buffer from the edge of the Traffic Lanes. The MAC requests that a half mile buffer between all Traffic Separation Zones, Anchorage Areas and any adjacent structures be included in any plan to allow for a greater separation between ships and towers. This is a heavily trafficked area with some of the largest ships that come to the United States passing through on a daily basis. Five hundred meters does not provide enough sea room to recover in case of an emergency that could lead to an environmental disaster.
4. Any cable crossing the Traffic Lanes must be buried to such a depth as to prevent them from being snagged by an anchor dropped in emergency.
5. The United States Coast Guard has planned an anchorage ground in the area bordered by 38-40.9N, 74-52.0W; 38-40.9N, 74-48.6W and 38-37.6N, 74-48.5W. The authority to create the anchorage ground has been granted by the Coast Guard Authorization Act and the MAC requests that this area be excluded from development. It is our desire that this anchorage be used as a replacement from the unofficial one located off of buoy "DA" noted above.
6. Any potential lease holder should be required to participate with the local commercial maritime community through the Mariners' Advisory Committee for the

Bay and River Delaware at all stages of the planning, construction, and operation of this project.

A working committee is being formed by the Mariners Advisory Committee to address wind farms being located near navigational fairways in our port region. It will be composed of navigators, maritime industry representatives and other interested parties. I would ask that the BOEMRE be represented and that they encourage the participation of representatives from the wind energy industry. The mission of the working group will be to provide a forum for all interested parties to gain an understanding of each other's expectations and concerns. You may contact me with your interest at mac.chair@comcast.net.

Sincerely yours,

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

Captain Stephen A. Roberts
Delaware Pilots
Chairman, Mariners Advisory Committee
(302) 542-6677