

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

Captain Stephen Roberts, Chairman

Captain H. Hickman Rowland Jr., Secretary

Organized 1964



Captain Rick Iulucci, Treasurer

Captain Joseph F. Bradley, Honorary Chairman

August 4, 2011

BOEMRE Office of Offshore
Alternative Energy Programs
ATTN: Program Manager
381 Elden Street, MS 4090
Herndon, VA 20170-4817

Docket #BOEM-2011-0053
Comments on Environmental Impacts for NJ, DE and MD WEAs

The Mariners Advisory Committee for the Bay & River Delaware (MAC) is comprised of master mariners, pilots and other maritime professionals and concerns itself with safety of navigation, with particular regard to large ocean going vessels. This committee works closely with the U.S. Coast Guard, National Oceanic and Atmospheric Administration (NOAA), U.S. Army Corp of Engineers, commercial operators, and port industry personnel to recommend and promote safe navigation practices on the Delaware Bay and River, as well as the approaches to this very important waterway.

Docket #BOEM-2011-0053 concerns the environmental impact that the development of the various Wind Energy Areas may have. This letter is in response to the MAC's concerns as related to the maritime industry. MAC's chartered purpose is to promote safe navigation. The members of MAC have real concern about the future ability of vessels that regularly transit in the vicinity of the proposed WEAs to navigate safely. MAC's primary concern is the location of wind generating or other structures in close proximity to navigational fairways.

Any structure can present a hazard to navigation, and a ship strike could cause the breaching of cargo and/or fuel tanks and could result in the discharge of oil into the environment. Any such spill could harm wildlife, habitat and adjacent beaches – impacting both the environment and the economy of coastal states. Therefore, MAC strongly recommends that no less than 1/2 nautical mile buffers be established beyond all vessel anchorages and navigation fairways and any wind energy structures; and that all structures be properly designated with navigation buoys, lights and RACONs.

MAC is also concerned about the negative environmental impacts that deviation of vessels around WEAs will have on the environment. Should WEAs be located such that existing navigational fairways are relocated seaward, the voyage distances for ships and tows transiting around the WEAs will result in increased fuel use and increased vessel emissions.

Respectfully submitted,

Captain Stephen A. Roberts
Chairman

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