



WORLD SHIPPING COUNCIL  
PARTNERS IN TRADE

Comments of the

## **World Shipping Council**

---

Submitted to the

## **Bureau of Ocean Energy Management, Regulation and Enforcement**

---

In the matter of

## **Commercial Leasing for Wind Power on the Outer Continental Shelf Offshore New Jersey – Call for Information and Nominations**

Docket Number:  
BOEM-2011-0005

---

June 6, 2011

The World Shipping Council (WSC) is a non-profit trade association that represents over twenty-nine liner shipping<sup>1</sup> companies that carry approximately 90% of U.S. international containerized trade. WSC files these comments with the Bureau of Ocean Energy Management, Regulation and Enforcement (BOEMRE) in response to the notice published on April 20, 2010, 76 Fed. Reg. 22130, which invites public comment on the call for information and nominations for the construction of wind energy projects on the Outer Continental Shelf (OCS) off the coast of New Jersey.

WSC has filed previous comments to BOEMRE on the leasing process for wind farms on the OCS. Those comments will not be restated here and may be found in BOEMRE docket numbers BOEM-2010-0077, BOEM-2010-0063, and BOEM-2010-0038 and on the WSC website at <http://www.worldshipping.org/public-statements/regulatory-comments/united-states>.

While WSC appreciates the desire to develop clean energy sources, such as wind power, on the Atlantic OCS, wind energy projects should not be sited in commercial shipping corridors or risk the safe navigation of vessels carrying America's waterborne commerce. We offer the following brief comments:

#### **1. Atlantic Coast Port Access Route Study Is Key to Future Decisions on Lease Areas**

We fully support the U.S. Coast Guard's decision to complete an Atlantic Coast Port Access Route Study (PARS) that will evaluate existing vessel traffic flows and densities for vessels entering and leaving ports and for vessels transiting along the coast. According to the Coast Guard, the PARS will identify where appropriate navigational safety exclusion areas should be applied, determine if any changes to existing navigation systems are warranted, and quantify the sizes and locations of buffer zones between vessel traffic routes and any wind turbine towers.

Since wind farm lease areas are being considered in OCS waters off multiple Atlantic states at the same time, completion of the Atlantic Coast PARS is essential because management measures intended to resolve navigational safety issues related to one State's wind farm leasing area can create navigational safety issues in other areas and for vessels transiting along the coast. Indeed, it is possible that the greatest impact of proposed management measures may not be on the interaction between vessels and wind turbine towers, but rather on the interactions among vessels. The PARS will help answer questions about how vessel traffic might be managed and what the effects of various management measures might be with respect to both navigation and other uses. The answers to these questions cannot simply be assumed; they must be derived from the technical evaluation that the Coast Guard has begun in the PARS.

---

<sup>1</sup> Liner vessels operate on fixed schedules among pre-determined ports. The Council's member lines operate containerships, roll-on/roll-off, and car carrier vessels. A list of the Council's members may be found at [www.worldshipping.org](http://www.worldshipping.org).

**Recommendation: We recommend that BOEMRE await the results of the Atlantic Coast PARS before proceeding with any commercial development of OCS wind energy areas.**

## **2. Comments on the Establishment of Buffer Zones**

One of the objectives of the PARS is to establish appropriate buffer zones between maritime traffic routes and wind turbine towers installed in lease areas. Adequate buffer zones from the edge of a maritime traffic route to the edge of the boundary of a wind farm lease area are essential to the safe navigation of vessels that are operating inside the maritime route. Buffer zones provide an area of open water to which transiting ships can divert if the ship loses power, loses steering, or suffers some other engineering casualty that forces the vessel to quickly depart the maritime route and conduct an emergency anchoring.

Although, according to the U.S. Coast Guard, there is no formula for setting the width of buffer zones between maritime routes and fixed objects, the size and limited maneuverability of oceangoing commercial ships provide some indication of how wide buffer zones should be. For example, container ships that call at U.S. ports often range from 750 feet to more than 1,000 feet long and require many lengths of the ship to come to a complete stop or to alter course. Once at anchor, such ships have the potential to swing in a wide circle around the anchor and chain that has been released to secure the vessel to the ocean bottom.

For reference, we note that the United Kingdom's Maritime and Coast Guard Agency's "Marine Guidance Note" (MGN) number 371<sup>2</sup> provides guidance on how wide buffer zones should be between wind turbines and maritime shipping routes. We note that the chart on page 13 indicates that the minimum suggested buffer zone to achieve a low risk of collision is at least 2 nautical miles. We would assume that BOEMRE's objective is, at a minimum, to achieve a low risk of collision.

We support the Coast Guard's stated plan to use the PARS to help evaluate what an appropriate buffer zone or zones should be between maritime routes and wind farm lease areas.

# # #

---

<sup>2</sup> A copy of MGN 371 may be obtained at: <http://ship-inspect.com/Documents/WINDmgn371.pdf>