



COMMENTS TO THE PROPOSED ENERGY MASTER PLAN
SUBMITTED ON BEHALF OF THE
MARITIME ASSOCIATION OF THE PORT OF NEW YORK AND NEW JERSEY

The Maritime Association of the Port of New York and New Jersey is pleased to offer these comments relative to the development of offshore wind projects as part of the Energy Master Plan review.

We request that all offshore wind development projects include several critical safety measures. These measures are vital to navigational safety and the environmental health of our coastal waters.

It is imperative that every possible precaution is taken to avoid collisions between ships and wind turbines, or between vessels that are confined to narrower channels as a result of the placement of wind turbines. The consequences of such events are potentially disastrous for our coastal waters and for the operation of our Port. The appropriate measures to do our collective best to prevent them are right at hand.

Any offshore wind development project must satisfy the following requirements:

- All in-water construction should at a minimum, be equipped with perimeter Automatic Identification System (AIS) transponders to allow proper detection.
- All in-water construction should include both weather observation capabilities and cellular telephone repeaters.
- A minimum setback of 5 miles must be established from all entry and exit points of historical and established waterway transit lanes, including internationally recognized traffic separation schemes and traditional deep-draft, and near-shore lanes
- A two-mile setback must be established from all other traffic lanes. This setback will protect against the potential for impacts between vessels and project developments, and will allow a clear field of vision for any vessels that may be emerging from a developed field.
- There must be clearly delineated contingency plans for any incident which may impede vessel traffic in the area.
- All continuous developed areas should have allowances for clear “cut-through” passages to allow marine traffic to pass through a field.
- Lighting must be constructed so as not to interfere with mariners’ night vision capabilities.

The mission of the Maritime Association of the Port of New York and New Jersey is to promote the safety of navigation, the security of marine assets, and the sustainability of the marine environment. We thank the BPU staff for its serious consideration of these proposed safety criteria.