



June 20, 2016

VIA WWW.REGULATIONS.GOV

L. L. Fagan
Rear Admiral
U.S. Coast Guard, Commander
First Coast Guard District

Dear Rear Admiral Fagan:

The U.S. Coast Guard (USCG) has published a notice that it is conducting a Port Access Route Study (PARS) for Nantucket Sound. 81 Fed. Reg. 15327 (Mar. 22, 2016). The study will be used as the basis for revising existing regulations to improve navigational safety in Nantucket Sound. The study is required by section 310(b) of the 2015 Coast Guard Authorization Act, Public Law 114-120, signed into law on February 8, 2016. Consistent with other PARS reports by the USCG, the study must look at both current and future activities and projects that could interfere with maritime activities or pose threats to navigation or to the marine environment. That information is essential to the planning activities of other agencies. In the case of Nantucket Sound, the information generated by such a study is of critical importance because of the severe threats to navigation posed by the Cape Wind Associates (CWA) proposed offshore wind energy project, which is currently on hold and cannot be considered a pre-existing use or activity.

These comments are submitted by the Alliance to Protect Nantucket Sound. The Alliance to Protect Nantucket Sound (also known as Save Our Sound) is a nonprofit environmental organization dedicated to the long-term preservation of Nantucket Sound, the historic body of water that lies between Cape Cod and the islands of Martha's Vineyard and Nantucket. The Alliance was formed as a grassroots organization in 2002 in response to CWA's proposal to build an industrial wind project in the Sound. CWA is a private developer seeking to build a 25-square mile wind power plant in public waters between mainland Cape Cod and the islands of Martha's Vineyard and Nantucket - just outside of the Massachusetts Ocean Sanctuary established in

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1971. Our goal is to protect Nantucket Sound in perpetuity through conservation, environmental action, and opposition to inappropriate industrial or commercial development. The Alliance supports formal designation of Nantucket Sound as a protected area.

The Alliance has participated extensively in the USCG review of navigational safety and marine environmental protection issues in Nantucket Sound since 2002. As the Alliance has repeatedly emphasized, navigational safety, environmental protection and ongoing maritime activities must be preserved and protected by the USCG, and the Nantucket Sound PARS demands that this opportunity to do so be taken. Until the Sound is protected from the CWA project, other revisions and “existing regulations to improve navigational safety in Nantucket Sound due to factors such as increased vessel traffic, changing vessel traffic patterns, weather conditions or navigational difficulty,” 81 Fed. Reg. 15328, cannot be addressed in a meaningful way. As discussed in this letter, the essential conclusion of the Nantucket Sound PARS must be that no industrial offshore wind energy projects can be located in Nantucket Sound because of the negative impacts on marine transportation, navigation safety and marine environmental protection.

Nantucket Sound and Navigation. Nantucket Sound is one of the most heavily used and hazardous bodies of waters in the nation. The Sound is a shallow, glacial basin with numerous shifting shoals and strong and irregular currents. “Over three million people travel on the waters of Nantucket Sound each year on ferry routes [in conditions that are] often foggy, stormy and subject to strong winds and currents.” 152 Cong. Dec. H4525 (daily ed. June 29, 2006). “Winter winds and waves along with spring and early summer fogs provide weather hazards in these waters,” and gales are common in the later fall and winter. *Id.* “Even without the problems caused by wind turbines, navigation on the Sound is a cautious proposition.” *Id.* The USCG and the National Oceanic and Atmospheric Administration (NOAA) have consistently warned mariners of the Sound’s navigational hazards long before CWA announced the proposed project, citing the “numerous rock and sand shoals,” the “extremely foggy conditions year round,” strong currents, and the “extreme vessel congestion during the summer months.” *See* 1996 and 2006. USCG Waterways Analysis and Management Surveys and NOAA Coast Pilot 2. Nantucket Sound attracts one of the largest recreational boating communities in the United States, and its

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waters support extensive commercial and recreational fishing activities. The Sound's Main Channel serves as a primary conduit between the Massachusetts and Rhode Island fishing fleets and their offshore fishing grounds. The same channel has been identified by USCG as "navigationally critical" as it serves as the primary back-up marine route to and from Boston and the Northeast should the Cape Cod Canal be closed due to hazard, repair or marine incident. *Id.*

Section 310(b) and Protecting the Current Maritime Uses. The USCG proposal purports to implement section 310(b) of the Coast Guard Authorization Act of 2015, which requires the Commandant, by no later than December 1, 2016, to conduct a port access route study of Nantucket Sound "using the standards and methodology of the Atlantic Coast Port Access Route Study [ACPARS]." The completed study is to be submitted by the House Committee on Transportation and Infrastructure and the Senate Committee of Commerce, Science, and Transportation.

The study's advertised purpose "to determine whether the USCG should revise existing regulations to improve navigation safety in Nantucket Sound due to factors such as increased vessel traffic, changing vessel traffic patterns, weather conditions, or navigational difficulty in the vicinity," 81 Fed. Reg. 15327, falls short of the purpose and principles embraced in ACPARS. The USCG announcement of the study is deficient to this expressed purpose to apply the principles and Marine Planning Factors developed in ACPARS to current and future marine activities on Nantucket Sound, specifically to the industrial wind energy facility proposed by CWA. The only USCG attachment to the docket, a "chart" of the proposed study area, bears no indication of the CWA facility's proposed site. Although the CWA project was directly addressed in ACPARS, the notice for the Nantucket Sound PARS makes no mention of proposed wind facilities or any reference at all to the very core concern that drove the ACPARS initiative, which was the development of offshore wind projects. Instead, the Nantucket sound PARS notice reads like a mere solicitation to comment on a routine WAMS study. Indeed, a review of the three docket comments received through June 16 shows only one addressing CWA, one requests marina maintenance dredging and the third requests that buoys be left in place for a local waterway year-round. In short, it would appear that the wording of the notice has led

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potential commenters to miss the central issue with PARS studies in Nantucket Sound and elsewhere (*i.e.*, industrial wind energy projects).

As explained by Rep. Duncan Hunter, section 310(b) is needed because the USCG excluded Nantucket Sound from the ACPARS. 161 Cong. Rec. E1839 (Dec. 18, 2015). This exclusion deprived the mariners and vessel operators of Nantucket Sound of important information on “how any project in Nantucket Sound would impact the navigational safety of *current marine transportation and vessel activities*.” *Id.* (emphasis added). As Rep. Hunter explained, the focus of the Nantucket Sound PARS must be to “identify the impact to the *current and future navigational activities*” and how to “*avoid unsafe operating requirements on vessels*.” *Id.* (emphasis added).

These statements by Rep. Hunter confirm that the Nantucket PARS must use current navigational conditions as the baseline to be protected. Such intent has significant importance as related to the proposed CWA project – as this project *does not exist* today. Indeed, the lease issued for this project has been suspended at CWA’s request, and no development can occur until that lease is reinstated. CWA has also failed to obtain financing, lost its power purchase agreements that were the necessary pre-requisite to obtaining such financing and lost its state permits, as a result of the recent decision by the Massachusetts Energy Facility Siting Board (EFSB) that CWA has failed to show that it qualifies for an extension. *Petition of Cape Wind Associates, LLC for Approval to Construct Two 115k Electric Transmission Lines Pursuant to G.L. c. 164, § 69J*, EFSB 02-2C (Apr. 6, 2016); *Petition of Cape Wind Associates, LLC for a Certificate of Environmental Impact and Public Interest Pursuant to G.L. c. 164, § 69K*, EFSB 07-8B (Apr. 6, 2016). CWA has been forced to file a lawsuit in the Massachusetts Supreme Judicial Court in an effort to overturn the EFSB denial, and the Alliance has intervened on the side of the EFSB.

As yet another indication of the futility of the project, throughout the EFSB proceeding, CWA argued it should receive an extension of its state permits because the Massachusetts legislature had previously introduced a bill that would require utilities to purchase electricity from offshore wind projects. CWA argued that such a law would lead to new power contracts for its expensive electricity, which would make financing possible. Despite CWA’s optimistic projections of its

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potential for revival as a result of the legislation, the current bill which has passed the House would not include any offshore wind project located within 10 miles of inhabited shorelines or which has not been subject to competitive leasing. These requirements would exclude CWA, while allowing other offshore wind projects, that are located in areas further from shore that would not present such navigational risk, to secure power purchase contracts under the mandate of the bill.

As stated in the final ACPARS report, the study “was chartered to address the potential navigational safety risk associated with the development of offshore renewable energy installations (primarily wind farms) and to support future marine spatial planning efforts.” The ACPARS area of concern was driven by the Department of the Interior’s “Smart from the Start” initiative concentrating on the outer continental shelf for potential lease sites for offshore wind energy generation. The USCG work in ACPARS was guided by its charge under the Ports and Waterways Safety Act to “...recognize the paramount right of navigation over all other uses in the designated areas ...” as well as Outer Continental Shelf Lands Act principle that “...the Secretary of the Interior shall ensure that any leases, easements or rights-of-way are carried out in a manner that prevents interference with reasonable uses of the exclusive economic zone, the high seas and the territorial seas; and in consideration of any other use of the sea or seabed, including use for a fishery, sealane, a potential site for a deepwater port, or navigation.” While the CWA proposed project was identified in the study and some analysis of marine activities in Nantucket Sound was performed, the recommendations and Marine Planning Guidelines developed in the study were proposed for application in offshore ocean areas and not for a lakes, bays and sounds environment such as Nantucket Sound. *Atlantic Coast Port Access Route Study*, Final Report, DN: USCG-2011-0351 dated 24 February 2016.

Congress has directed the USCG through section 310(b) to fill this void and to prepare a PARS study for Nantucket Sound. In doing so, as Rep. Hunter has made clear, the USCG must protect “current” navigational activities from the impact of “any project” on “current marine transportation.” There can be no premise in the proposed study that those current navigational activities must change or alter their longstanding operations to accommodate the CWA project. Instead, the Nantucket Sound PARS should apply the Marine Planning Guidelines developed in

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ACPARS and propose how any future project would have to be rejected, relocated or modified to accommodate safe separation buffers or distances to avoid interference with the status or projected maritime activities of Nantucket Sound.

ACPARS Principles and the Protection of Navigational Safety. Beginning with a clean slate as described above makes a critical difference in the outcome of the Nantucket Sound PARS. The clear precedent established by the ACPARS is to define areas where development, including offshore wind and other projects, should *not* be located because of navigational conflicts but rather sited and sized to avoid such current and future conflicts. Regulations for port access and other navigational purposes can then be set based on the resulting configuration of projects.

The essence of the ACPARS process developed by the USCG was to identify and avoid the negative impact of siting offshore wind energy projects on both current and forecast marine activities occurring in the vicinity of the wind energy areas (WEA's) proposed by the Bureau of Ocean Energy Management (BOEM). While the USCG sought to eliminate unacceptable risks by changing the routes used by vessels, and identified one "alternate route" for tugs and barges, the vast majority of the recommended changes were applied to the WEA's - eliminating those conflicts by reducing the size or altering the configuration of the WEA's proposed BOEM. Indeed, ACPARS recommended eliminating some areas for offshore wind project development because of these conflicts. Within ACPARS, the USCG studied the recommendations and application of navigational safety "separation buffer" zones and safe "separation distances" utilized by other countries and ship operating organizations concluding they were essential to the planning of a WEA and to ensure the safe operation of transiting vessels and commercial fishing operations. ACPARS adopted minimum safe separation distances ranging from 1 n.m. to 5 n.m. as a guideline for separating WEA's from vessel routes, traffic separation schemes and traditional commercial fishing areas. BOEM downsized the WEA's accordingly.

ACPARS examined 14 potential WEA's ranging from North Carolina to Maine, including the CWA proposed project for Nantucket Sound. Working through BOEM, the USCG, with one exception, reduced the size and proximity of the WEA's to traditional shipping routes and to commercial fishing areas to avoid disrupting shipping routes, to preserve navigational safety, and to avoid disruption of fishing. In addition to reducing the size of the WEA off Delaware, USCG,

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working with the American Waterways Operators, proposed an alternate route for tugboat and barge traffic which is anticipated to reduce the threat to navigation safety posed by wind energy generators in that area. A significant analytical tool developed and applied by the USCG is found in Enclosure 2 to the ACPARS report – Marine Planning Guidelines. These guidelines define their purpose as follows:

These guidelines are provided to assist offshore developers and marine planners with their evaluation of the navigational impacts of any projects with multiple permanent fixed structures. The coastal areas include multiple users such as commercial shipping, tug and barge operations, commercial and recreational fishing, research vessels, offshore support vessels and aquaculture apparatus. The guidelines consider sea space necessary for ships to maneuver safely, and discuss other factors to be considered when determining appropriate separation distances for the siting of offshore structures near shipping routes and other multiple use areas.

These guidelines are not regulatory. They do not impact the boundaries of any existing leases for site characterization and site assessment activities, but do inform suitability of siting structures within a lease area. These guidelines should be considered during the area identification phase for both unsolicited and solicited development areas and when determining the siting of structures within existing areas. These guidelines also serve as one of the references to inform the Navigation Safety Risk Assessments (NSRA) conducted by developers.

The core concern of these guidelines is the realization that for vessels to navigate safely, whether in passing other vessels or fixed obstacles such as wind turbine generators (WTG's), they require both distance and time to safely maneuver. For larger vessels and tugs towing barges on a wire, the guidelines propose a minimum "separation buffer" or "separation distance" of 2 nautical miles (n.m.). These minimum separation distances were recommended in ACPARS to separate vessels travelling on routes from any adjacent WTG's among other potential obstacles. The ACPARS report explains the goal of the guidelines as follows:

The goal of these guidelines is to minimize interference with shipping routes such that the safety of navigation is not compromised, while providing the flexibility to evaluate site specific conditions to maximize area considered for development.

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In situations where achieving a low risk is not possible, the goal would be to mitigate risk to as “*Low as Reasonably Practicable...*”

ACPARS Planning Guidelines recommends the following approach in evaluating the navigation impact for offshore wind energy projects:

- Identify a navigation safety corridor to ensure adequate sea area for vessels to transit safely.
- Provide inshore corridors for coastal ships and tug/barge operations.
- Minimize displacement of routes further offshore.
- Avoid displacing vessels where it will result in mixing vessel types.
- Identify and consider cumulative and cascading impacts of multiple offshore renewable energy installations (OREIs), such as wind farms.

As mentioned above, there was one exception made by USCG in applying the principles of ACPARS to the 14 identified WEA's – that single exception was made for the CWA project proposed for Nantucket Sound. The project site would span 25 square miles around Horseshoe Shoal in the center of the three main shipping routes and the Main Channel of the Sound, a highly congested area used by shipping operators, ferry lines, tug/barge and tanker operations, commercial fishermen, and recreational boaters. The two local ferry operating companies alone transport 3 million passengers per year between Cape Cod and the islands of Nantucket and Martha's Vineyard, with much of this traffic concentrated in the summer months and transiting within or adjacent to the proposed CWA facility boundaries. The CWA site is unacceptably close to navigation routes and channels with some of the turbine structures to be erected at less than 0.25 n.m. from the channel boundary - the risk of collision including high-speed passenger ferries with the turbines and resulting pollution would increase especially during the frequent fog and storms for which the area is known.

Despite these severe conflicts, ACPARS provides no explanation why Nantucket Sound was excluded. The reason, however, is quite obvious. At that time, DOI was pushing the CWA project rapidly, making every effort to facilitate the development of this project to advance the policy goal of leasing federal lands for renewable energy on a fast track and large-scale basis.

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CWA was one of the projects targeted by DOI for this purpose, and an operable lease for the proposed project was in effect at the time of ACPARS.

Section 310(b) now makes it clear that the safety principles identified in ACPARS must apply to Nantucket Sound; there can be no double standard that gives navigational activities in the Sound less protection than those located elsewhere along the Atlantic Coast.¹ When the ACPARS principles are applied to Nantucket Sound, it is clear that the USCG must set forth clear recommendations against the development of the CWA project. The USCG is now in a unique position to apply the new standards and guidelines of ACPARS to fully address the navigational safety threats posed by the CWA project whose lease has been suspended (especially since there are now offshore alternatives that are less conflicted from a navigational safety perspective.) This is especially true because the CWA lease has been suspended and is no longer subject to development before July 2017, and only then at the discretion of DOI subject to new findings.

¹ The USCG has already made the error of failing to protect Nantucket Sound navigation despite a clear mandate to do so. Section 414 of the USCG and Maritime Transportation Act of 2006 required the USCG to address the safety impacts the CWA Project would pose and directed the USCG to specify terms and conditions (“T&Cs”) to protect navigational safety in Nantucket Sound. Pub. L. No. 109-24, § 414 (2006). If T&Cs cannot make the Project safe, it cannot be built: “[T]he Commandant may find that no amount of mitigation could be sufficient to eliminate the potential detrimental effects of the specific siting of this development[, in which case] the Secretary must abide by the decision” 152 Cong. Rec. S6439 (daily ed. June 22, 2006) (statement of Senator Stevens). Congress thus prioritized safety over all other considerations. The USCG, however, did not prioritize safety and violated Section 414 in three ways. First, the USCG did not specify T&Cs necessary to provide for navigational safety for the Project or its alternatives, instead only vaguely promising to develop unspecified measures sometime in the future, *after* BOEM approved the Project. The USCG’s refusal to specify determinate T&Cs violates not only Section 414, but rendered inadequate the EIS and all subsequent safety determinations made by other agencies that relied on the USCG’s analysis. Second, the USCG impermissibly shifted the burden for maintaining navigational safety from CWA to the public, reducing Section 414 to an empty measure. Third, the USCG’s conclusion that navigational impacts will be “moderate” and mitigable is arbitrary and capricious and contrary to the record. The record demonstrates that navigational radar will be *significantly adversely impacted* by the turbines. The USCG has not recommended measures that reduce the “significant adverse impact” to a “moderate” one, which in any case, is not the standard Congress required. Ultimately, the USCG failed to comply with Section 414, because its analysis was guided by an improper principle: don’t kill the project. (USCG Captain Perry, responsible for final decision, explaining that he did not recommend protective buffer zones—as are now imposed on every other project—because it could “kill the project”); *see also* USCG19712 (explaining that “[i]f Cape Wind were to use [setback measures to address radar interference], the proposed wind farm would hold too few [turbines] to be economical”). Every measure the USCG took (or did not take) was dictated, not by safety, but by the economic limitations CWA established. Congress directed the USCG to protect navigational safety, the USCG did not, and its failure to do so is now in litigation in the D.C. Circuit Court of Appeals. [Public Employees for Environmental Responsibility et al. v. Hopper et al., No. 14-5301- (consolidated with No. 14-5303) (Argued Feb. 11, 2016)]. The Section 310(b) study gives the USCG another chance to get it right and protect navigational interests and safety in Nantucket Sound by recommending against reinstatement of the CWA lease or any further approvals of that Project.

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DOI clearly has discretion on whether to reinstate the lease, and the decision to do so is subject to NEPA. See *California v. Norton*, 311 F.3d 1162 (9th Cir. 2002).

While many of these impacts may have already been analyzed in the compliance that occurred before lease issuance, if “[t]here are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts”, then a supplemental environmental impact statement must be prepared. 40 CFR 1502.9(c)(1)(ii). At the very minimum, BOEM must address whether such new information, like Coast Guard marine navigational safety determinations, affect the termination of the lease. If so, and we consider this likely, BOEM must prepare a supplemental EIS that under standard NEPA procedures must include an examination of all reasonable alternatives to the siting of the CWA project. 40 C.F.R. § 1502.14. The Nantucket Sound PARS study will be a new development that must be taken into account, and if ACPARS principles are applied, must result in a decision that the lease cannot be reinstated.

ACPARS Principles as Applied to the CWA Project Proposed for Nantucket Sound. The USCG made significant advances in the protection of navigation safety and the marine environment in evaluating, eliminating or mitigating the threats posed to vessels and marine activities by proposed wind energy facilities. Jointly USCG, BOEM and the National Marine Fisheries Service also identified and protected traditional fishing areas causing them to be removed from consideration as potential lease sites for offshore energy facilities further eliminating navigation conflicts in those areas. The same outcomes have not been achieved to date in the USCG review of the CWA facility.

The USCG should conduct a PARS for Nantucket Sound applying the methods, principles and planning guidelines to the Sound as were developed and applied in ACPARS. Specifically, the USCG should:

1. Issue a Supplemental Federal Register Notice describing the ACPARS principles and emphasizing that a focus of the Nantucket Sound PARS would be proposed wind energy facilities including the CWA proposed project. Any chartlet included in the docket

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should clearly identify the CWA lease area and footprint as well as any other proposed projects.

2. Conduct an up-to-date survey of all vessel transits or related marine activities in Nantucket Sound, their routes, frequency and vessel type. This assessment should also be projected into a foreseeable future to address anticipated growth or change in these transits/activities. Some of this work is contained in ACPARS, *see* enclosures (1) through (4), which demonstrated that vessel transits adjacent to the CWA proposed site in Nantucket Sound were significant, ranking #9 of 14 in frequency of the 14 WEA's examined.
3. Once the major routes and fishing areas have been identified and analyzed, the Marine Planning Guidelines of ACPARS should be applied to identify and eliminate conflicts with the CWA proposal and any other proposed projects. Essential to this step is the application of the "separation buffer" or "separation distance" developed in ACPARS. A safety "separation" of 1.5 to 2 n.m. from any of the CWA proposed boundaries is at a minimum, essential to preserve the navigation safety of transiting vessels and to forestall damage to the marine environment resulting from marine mishaps. Based on the transit analyses performed in ACPARS for the CWA proposed facility, this "separation" should be applied at a minimum to the lengths of Nantucket Sound's North Channel, Main Channel and the Hyannis to Nantucket ferry routes given the lack of "sea room" to maneuver, the underwater hazards, the displacement of vessels from the WEA, the mixing of vessel types and adjusting for cross track errors. An even more appropriate result would, of course, be to recommend to decline to reinstate the lease even if CWA is in a position to proceed with development which seems very unlikely given the loss of its power contracts, inability to obtain funding, and loss of all state permits).
4. With the Marine Planning Guidelines applied to the CWA proposed area and any other similar projects, the ACPARS Red-Yellow Green methodology should be utilized. Any area of the industrial project that encroaches into or beyond vessel routes with safety separations distances overlaid should be eliminated as posing unacceptable risk. A similar step should also be taken to eliminate any proposed industrial areas that encroach

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on traditional commercial fishing areas or other sensitive sites/activities to eliminate conflicts.

5. The CWA industrial site proposed for Horseshoe Shoal poses an unacceptable and unnecessary threat to the current marine activities occurring daily in Nantucket Sound, to the innocent passengers carried and to the fishermen of the Shoal; a threat that the USCG can eliminate by applying the standards and guidelines developed in ACPARS.

Thank you for your consideration of our comments. Please let me know if you have any questions or need any additional information.

Sincerely,

A handwritten signature in blue ink that reads "Audra Parker". The signature is written in a cursive, flowing style.

Audra Parker

Enclosures (1) through (4)

Appendix IV

Summary of Transits Through Wind Energy Areas and Wind Lease Areas by Summary Vessel type

C. Results of Quantifying Transits through Wind Energy Areas and Wind Lease Areas

The number of unique MMSIs and unique transits for 2009 for all vessel types are summarized below in Table 1 for Wind Energy and lease areas (as of May 2013).

Wind Energy and Wind Lease Areas	Unique MMSI	Unique Transits
Maine Statoil	44	133
Massachusetts WEA	373	1206
Massachusetts Cape Wind	170	1087
Rhode Island/ Massachusetts Are of Mutual Interest	347	2609
New York	220	677
New Jersey	1257	10774
New Jersey - Fishermens Energy LLC	119	533
New Jersey - GSOE-I LLC	160	360
Delaware WEA	459	1508
Maryland WEA	823	2841
Virginia	892	2263
North Carolina - Kitty Hawk WEA	1553	7180
North Carolina - Wilmington East WEA	1008	4119
North Carolina - Wilmington West WEA	87	218

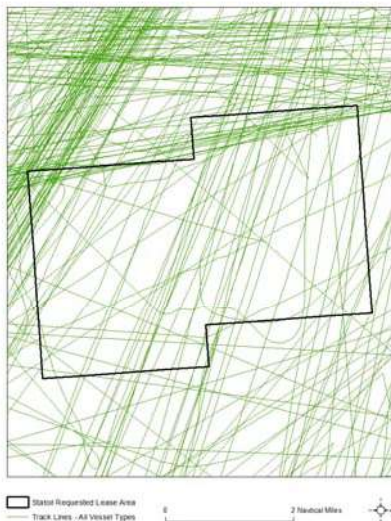


Figure 7 - Tracklines for Statoil

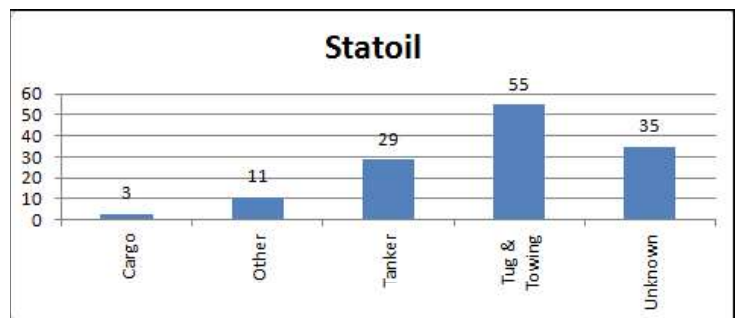
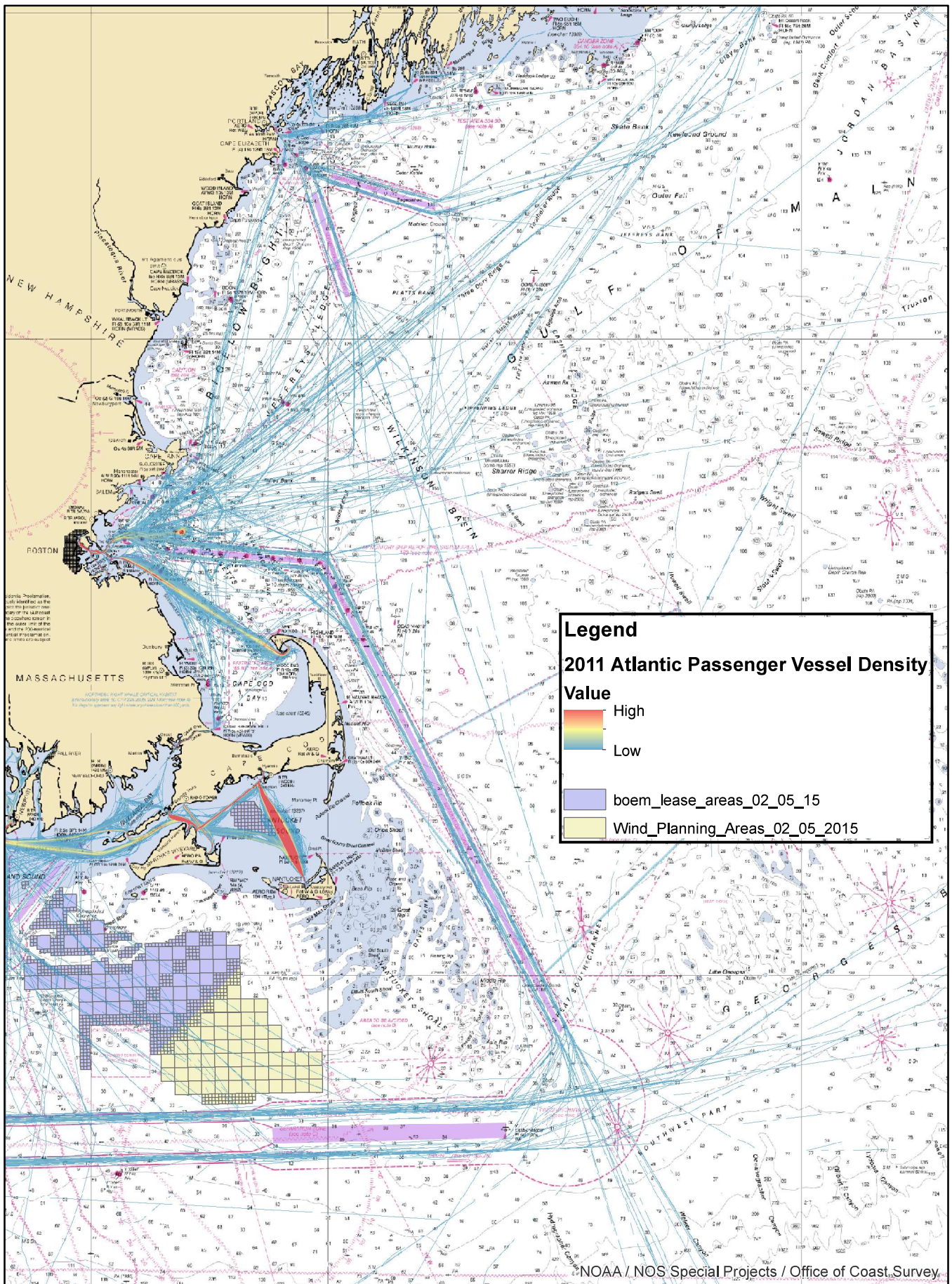
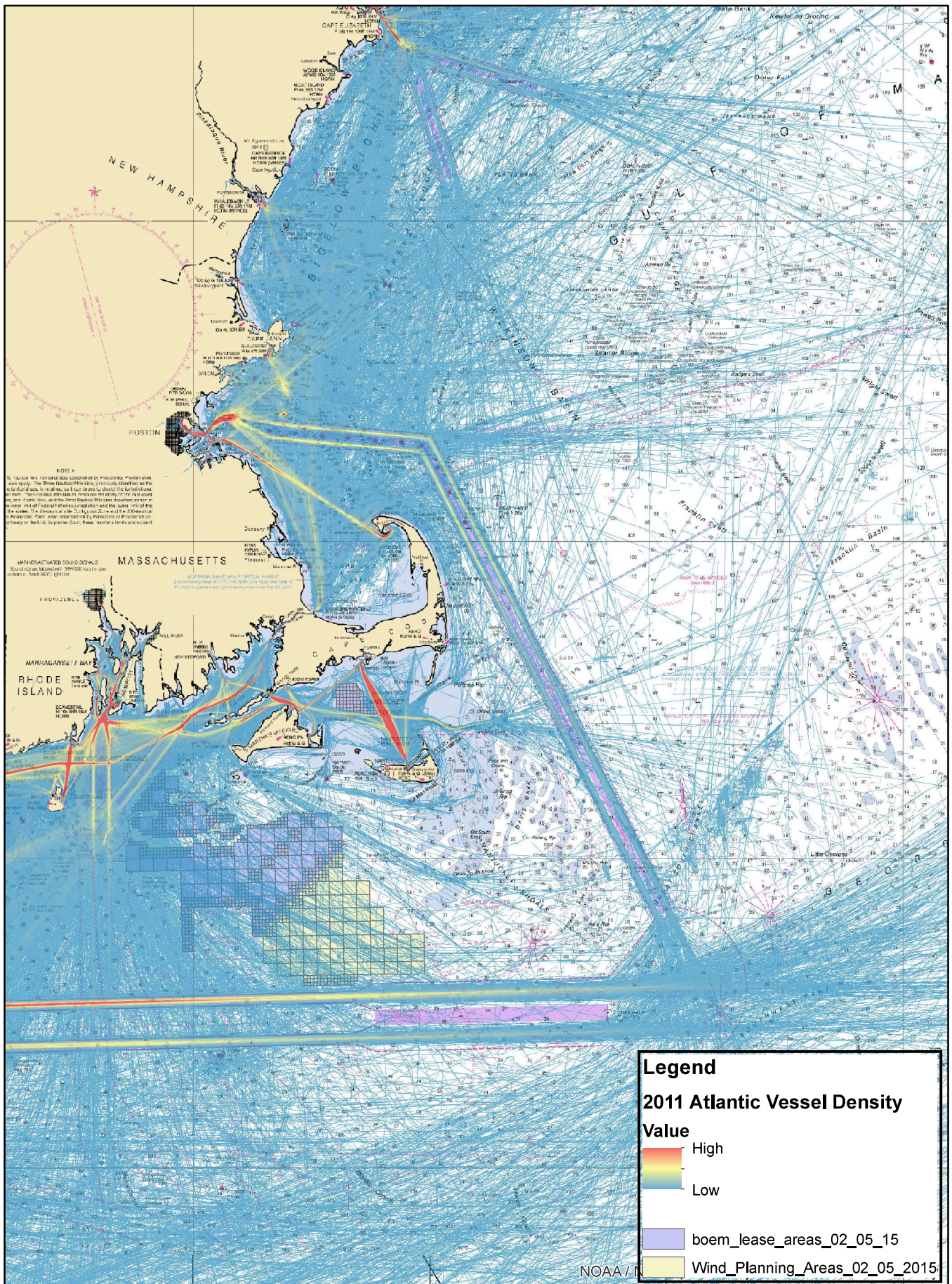


Figure 6 - Number of Transits by Summary Vessel Type

Northeast 2011 Passenger Vessel Density



Northeast 2011 Vessel Density



Appendix IV

Summary of Transits Through Wind Energy Areas and Wind Lease Areas by Summary Vessel type

Table 1: Summary of Unique Vessels and Unique Transits

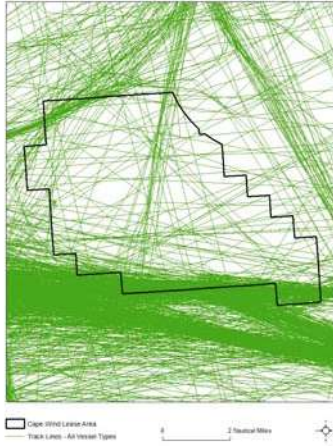


Figure 11 - Tracklines for Cape Wind

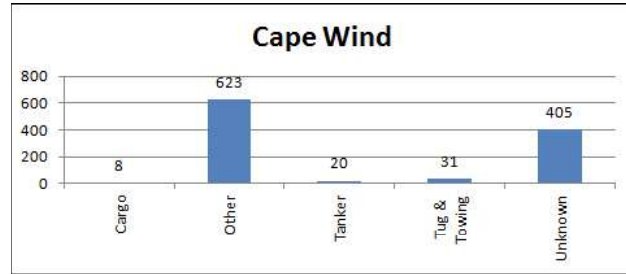


Figure 12 - Number of Transits by Summary Vessel Type

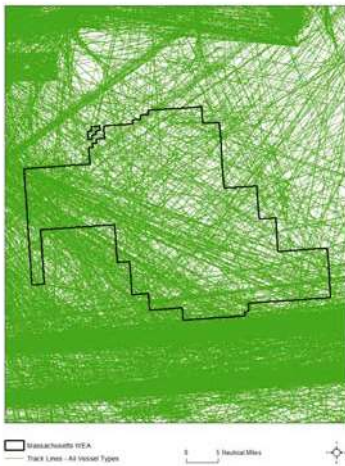


Figure 10 - Tracklines for Massachusetts

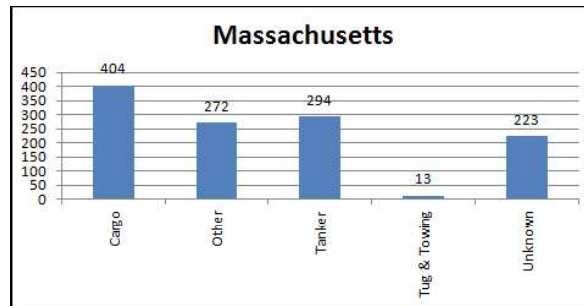


Figure 13 - Number of Transits by Summary Vessel type

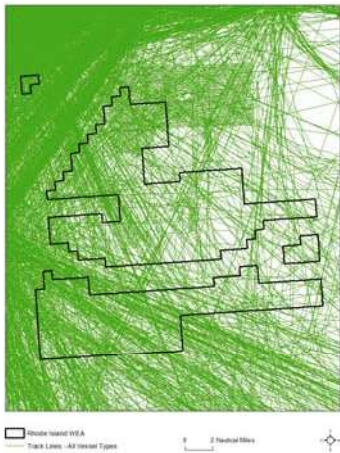


Figure 8 - Tracklines for Rhode Island

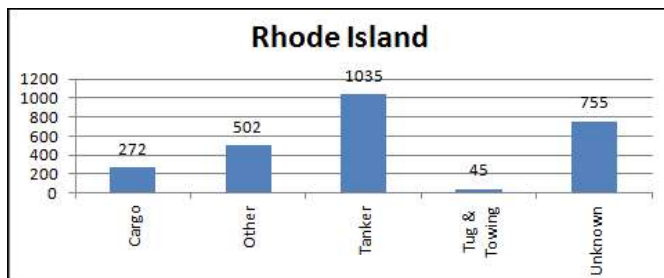


Figure 9 - Number of Transits by Summary Vessel type