The American Waterways Operators
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Mr. Darryl K. Francois
Chief, Projects & Coordination Branch
Bureau of Ocean Energy Management
Office of Renewable Energy Programs
381 Elden Street, HM 1328
Herndon, VA 20170

RE: Commercial Leasing for Wind Power on the Outer Continental Shelf Offshore Maryland

Dear Mr. Francois:

The American Waterways Operators is the national trade association for the U.S. tugboat, towboat, and barge industry. Our industry's more than 4,000 tugboats and towboats and more than 27,000 barges safely and efficiently move more than 800 million tons of cargo each year in the domestic commerce of the United States, including more than 60 percent of U.S. export grain, energy sources such as coal and petroleum, and other bulk commodities that are the building blocks of the U.S. economy. The AWO membership also includes harbor service providers, who literally guide America's critical commerce to port. We appreciate the opportunity to comment on recent revisions to the proposed Maryland Wind Energy Area (MD WEA) that has been identified as a potential wind energy leasing location.

AWO members are proud to be part of an industry that is the safest and most fuel efficient, and has the smallest carbon footprint of any transportation mode. AWO members also have a deep commitment to safety, having adopted in 1994 the Responsible Carrier Program, a code of safe marine practices and environmental stewardship, with which audited compliance is a condition of AWO membership.

AWO's commitment to environmental stewardship includes support for the development of alternative energy resources. However, it is critical that such projects not produce navigational hazards that put vessels and their crews at risk, or obstruct the movement of goods on which the nation's economy depends. BOEM must take into account the activities of the maritime industry as potential sites for alternative energy projects are considered in the Maryland, Delaware, and New Jersey Call Areas.

Call Area "Maryland" is located within a traffic lane utilized by the maritime industry, including tugboats and barges, for north-south routes. While some vessels do prefer a near-shore route, many tugboats and barges utilize an offshore north-south route because it allows vessels to avoid the congestion present at the mouth of Delaware Bay. This congestion is present due to heavy traffic into and out of Delaware Bay, which is directed into a traffic separation scheme. Maintaining the current north-south route for tugboats and barges will allow them to cross the inbound-outbound traffic lanes for Delaware Bay further from shore at nearly right angles. This will minimize congestion in the area. Congestion is a potential safety hazard, especially during inclement weather, when visibility is reduced and tugboats may require longer tow lines for barges under tow.

The current MD WEA would force tugboats to navigate an additional 10-12 miles offshore from the current north-south routes at all times and in all weather conditions. In certain weather conditions, just one mile further offshore can change sea conditions drastically for certain vessels, putting these vessels at greater risk and jeopardizing a safe transit. In addition to these safety concerns, forcing vessels out of normal navigational routes will waste up to 100 gallons of fuel per hour, increase air emissions, and add hours to transit times, adding to the cost of goods moved. These new proposed transit routes will lead to increased costs in the transportation of essential commodities that are the building blocks of our national economy.

Given the safety, economic, and environmental disadvantages of proceeding east of the current MD WEA, many tugboats would likely opt to proceed inland of the WEA. This would result in increased congestion into and out of Delaware Bay, as tugboats and barges cross the traffic separation schemes. The plan titled "USCG Alternative 1" modifies the eastern edge of the MD WEA to allow tugs and barges to continue their preferred north-south route, albeit with several modifications.

Keeping the aforementioned safety, economic, and environmental concerns in mind, AWO strongly recommends that BOEM modify the MD WEA using "USCG Alternate 1" as the eastern edge of the call area (see page 4). This includes removing the following lease blocks from WEA consideration: 6827; 6826; 6825; 6777; 6776; 6775 (except aliquots A, B, and E); 6726 (except aliquot A); and 6725 (aliquot P only).

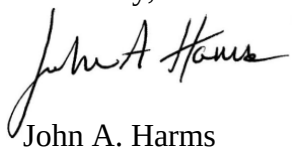
Modification of the MD WEA to allow for a north-south vessel route will be a positive improvement on the current siting scheme. However, AWO is concerned with the cumulative impact of additional WEAs planned in the region. Many AWO members utilize a near-shore route from Virginia to New Jersey and those routes must also be preserved. The current WEA development process relies on a piecemeal, state-by-state approach for addressing vessel navigation issues. Developing additional offshore wind energy projects in Delaware and New Jersey could severely disrupt offshore and near-shore vessel operations on the Atlantic coast. A significant portion of the region's chemical and petroleum goods are moved by tug and barge from Norfolk, Baltimore, and Philadelphia to New York, Boston, and points north. The proposed WEAs offshore of Maryland, Delaware, and New Jersey will have a substantial impact on this trade.

To mitigate these concerns, AWO supports the U.S. Coast Guard's Atlantic Coast Port Access Route Study (ACPARS), which will clearly define current and future vessel traffic routes for tugs, barges, and deep draft vessels in the area. Using data developed through the ACPARS process, fairways can be identified and established to ensure that wind projects will not produce navigational hazards that put vessels and crews at risk, or obstruct the vital movement of goods to and from ports. The tugs and barges operated by AWO members do not always navigate in the same waters and along the same routes as deep draft vessels, but the interaction of these varying routes can have a major effect on vessel operations and safety. AWO remains very concerned that any displacement of deep draft vessel navigation routes could cause a cascading effect, thus displacing and/or disrupting the routes utilized by shallow draft towing vessels.

AWO strongly recommends that BOEM delay a final decision regarding the siting of the MD WEA until the ACPARS is completed and the findings of that study are incorporated into the siting of the WEA. This will ensure that state-by-state energy plans include a regional and national understanding of vessel operations.

Thank you for the opportunity to comment. AWO would be pleased to answer any questions or provide further information as the Bureau sees fit.

Sincerely,



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Potential WEA Configurations under Consideration