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Brian Vahey
Senior Manager – Atlantic Region

January 25, 2016

Ms. Abigail Ross Hopper
Director
Bureau of Ocean Energy Management
1849 C Street, NW
Washington, DC 20240

Re: Commercial Leasing for
Wind Power on the Outer
Continental Shelf Offshore
South Carolina—Call for
Information and Nominations
(Call) MMAA104000
(Docket No. BOEM–2015–
0134)

Dear Director Hopper:

The American Waterways Operators is the national trade association for the U.S. tugboat, towboat, and barge industry. Our industry is the largest segment of the nation's 40,000 vessel Jones Act fleet and moves more than 800 million tons of cargo each year safely and efficiently. This includes more than 80 percent of New England's home heating oil, 60 percent of U.S. export grain, and significant bulk commodities transported along the Atlantic Coast. We appreciate the opportunity to comment on the Call for Information and Nominations for the areas offshore South Carolina that have been identified as potential wind energy leasing locations.

AWO members lead the maritime industry in safety, security, and environmental stewardship. We are committed to working with government partners to advance these shared objectives. AWO's Responsible Carrier Program, the safety management system with which all AWO members must comply as a condition of association membership, highlights AWO member commitment to safety and environmental protection. AWO members are committed to the goal of zero harm from our industry's operations – to human life, to the environment, and to property. To realize this goal, AWO looks forward to continuing to work with BOEM and other government and industry partners to minimize navigation safety and environmental risks posed by offshore wind energy projects.

AWO requests that BOEM wait for the completion of the Atlantic Coast Port Access Route Study (AC PARS) before proceeding with the leasing process for the proposed South Carolina Call Areas. The AC PARS will allow the U.S. Coast Guard to establish fairways to ensure that poorly-sited offshore wind energy projects will not create navigational safety hazards that put crews and vessels in harm's way, or impede commerce by preventing or delaying essential commodities from being transported to and from ports. The AC PARS will provide a better understanding of the comprehensive navigation safety hazards posed by proposed WEAs, and is expected to be released by the Coast Guard for comment within the next month. Since the release of the study is imminent, it is critical that BOEM wait for the results before moving forward with the leasing process for the proposed South Carolina Call Areas.

AWO members operating in South Carolina perform ship docking services in the port of Charleston and move cement into Georgetown. Tows involved in coastwise trade routinely travel through South Carolina waters. AWO is concerned that the siting of the Grand Strand Call Area will present a threat to maritime safety because it will interfere with two routes typically taken by towing vessels when entering or departing from Winyah Bay. BOEM can address these concerns in South Carolina and elsewhere by ensuring that the locations of all proposed wind energy areas are informed by the AC PARS. BOEM can also use this information to develop a holistic strategy for the siting of future WEAs. Moving forward without taking the AC PARS into consideration could force vessels to operate outside of preferred navigational routes. Such action will jeopardize navigation safety, increase air emissions, and add hours to transit times, leading to higher transportation costs for essential commodities.

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

Sincerely,

A handwritten signature in cursive script that reads "Brian W. Vahey". The signature is written in dark ink and is positioned above the typed name and title.

Brian W. Vahey
Senior Manager – Atlantic Region