



801 North Quincy Street
Suite 200
Arlington, VA 22203

PHONE: 703.841.9300
EMAIL: bvahey@americanwaterways.com

Brian W. Vahey
Senior Manager – Atlantic Region

July 7, 2020

Mr. Jerry Barnes
U.S. Coast Guard Fifth District
431 Crawford Street
Portsmouth, Virginia 23704

Re: Anchorage Ground; Cape Fear River
Approach, North Carolina (USCG-2020-
0216)

Dear Mr. Barnes:

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 domestic fleet and moves more than 760 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 imported into and exported from Mid-Atlantic and Southeast states. On behalf of our over 300 AWO member companies, thank you for the opportunity to comment on the proposal to revise anchorage space offshore North Carolina.

AWO represents an industry that cares deeply about safety and the environment. For more than 25 years, AWO has had a formal partnership with the U.S. Coast Guard to address issues of safety and environmental stewardship at both the national and the regional level. In the Atlantic Region, AWO has worked with the Coast Guard through the Atlantic Region Quality Steering Committee, the regional arm of the Coast Guard-AWO Safety Partnership, to address issues such as hurricane preparedness and safe navigation around structures.

In AWO's comments on the Coast Guard's North Carolina Port Access Route study in May, we praised the agency for its concerted outreach to stakeholders to address safety issues offshore of North Carolina. AWO also applauds the U.S. Bureau of Ocean Energy Management for its proactive engagement with the maritime community to avoid navigation conflicts with proposed wind energy areas in North Carolina waters. The spirit of collaboration between agencies and industry has helped ensure that North Carolina maritime operators can continue to keep vessels, mariners and cargo moving safely and efficiently.

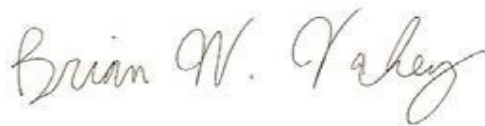
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In the coming years, some of the largest vessels anywhere on the East Coast are expected to call on North Carolina ports, and only a resilient waterway system will accommodate different and larger vessel types. Anchorages are an important tool for traffic management and the predictability they provide is important for safety, especially during inclement weather. Most vessels calling on Cape Fear will eventually need to anchor, whether waiting for a berth or for a safer tide or current, and the creation of this anchorage area will better serve the needs of waterways users. The proposed anchorage area will support and encourage economic growth in a safe and environmentally responsible manner.

Thank you for the opportunity to provide comments on this important subject. We would be pleased to answer any questions or provide further information as the Coast Guard sees fit.

Sincerely,

A handwritten signature in cursive script that reads "Brian W. Vahey". The ink is dark and the signature is written in a fluid, connected style.

Brian W. Vahey
Senior Manager – Atlantic Region