



The American Waterways Operators

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February 23, 2015

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

RE: Environmental Assessment for Commercial
Wind Lease Issuance and Site Assessment
Activities on the Atlantic Outer Continental
Shelf Offshore North Carolina; MMAA104000
(Docket No. BOEM-2015-0001)

Dear Mr. Cruickshank:

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 along the Atlantic Coast. We appreciate the opportunity to comment on the Environmental Assessment for Leasing and Site Assessment Activities in the North Carolina Wind Energy Areas (WEAs).

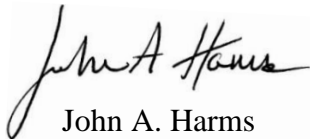
AWO members lead the maritime industry in safety, security, and environmental stewardship. We are committed to working with government partners to advance these shared objectives. AWO's Responsible Carrier Program, the safety management system with which all AWO members must comply as a condition of association membership, highlights AWO member commitment to continuous safety and environmental protection. AWO is 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 continued work with BOEM, North Carolina state officials, and industry partners to minimize risk to life, the environment and property.

AWO supports the revised locations of the three North Carolina Offshore WEAs and thanks BOEM for working proactively with AWO, regional stakeholders, and the U.S. Coast Guard early on in the process to determine the best locations for the Kitty Hawk and Wilmington East WEAs. As the plans for existing and future WEAs are considered, AWO encourages BOEM to

use this process of early engagement as a model when permitting other wind energy projects, so that the threat to maritime safety is minimized. In particular, we believe this early-engagement approach would be especially useful with the Maryland and Delaware WEAs, both of which present significant navigation safety concerns to the towing industry. Proactive and constructive outreach is necessary to minimize the threats to maritime safety and is especially important in the absence of a completed Atlantic Coast Port Access Route Study. We look forward to working with BOEM to reduce the threats to navigation safety posed by these planned projects.

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,

A handwritten signature in black ink, appearing to read "John A. Harms". The signature is written in a cursive style with a large initial "J".

John A. Harms