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Brian Vahey  
Senior Manager – Atlantic Region

July 30, 2018

Office of Renewable Energy Programs  
Bureau of Ocean Energy Management  
45600 Woodland Road  
Sterling, VA 20166-9216

Re: Commercial Leasing for  
Wind Power on the Outer  
Continental Shelf in New  
York Bight – Call for  
Nominations  
(BOEM–2018–0004)

Dear Sir or Madam:

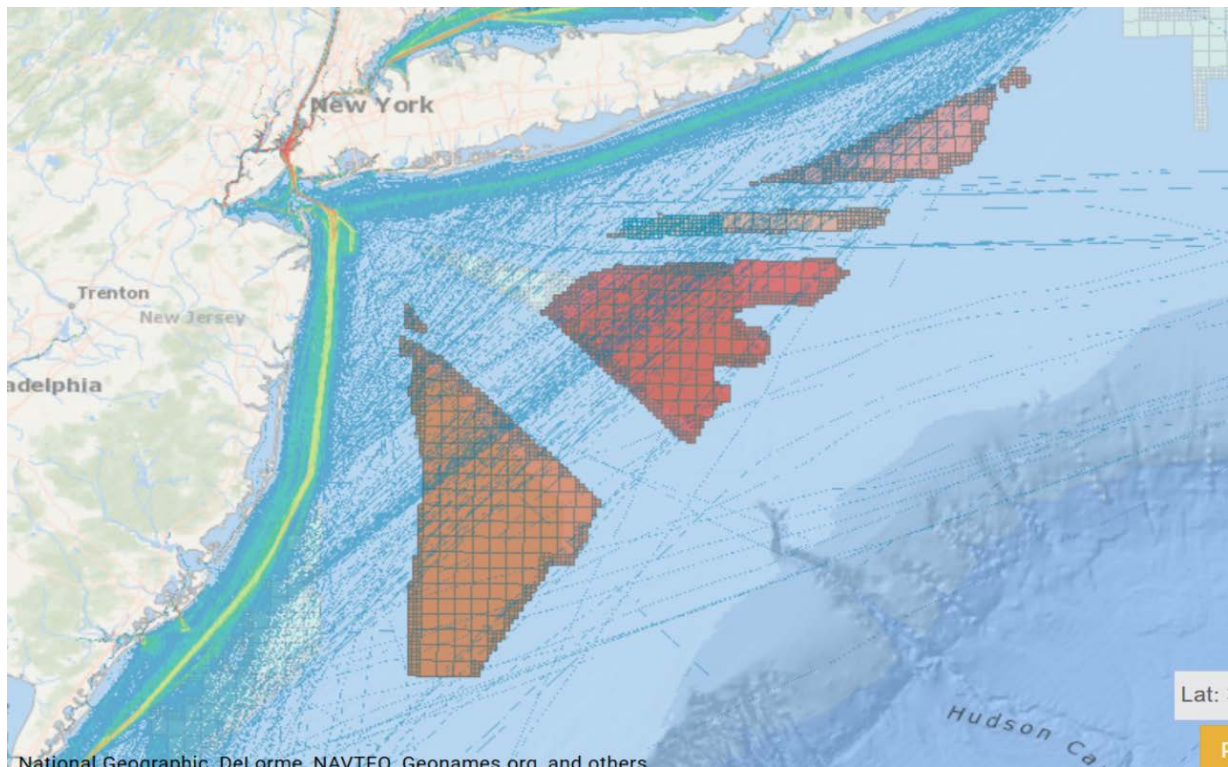
The American Waterways Operators is the national trade association for the U.S. tugboat, towboat and barge industry. Our industry is the largest segment of the nation's 40,000 vessel Jones Act fleet and moves more than 760 million tons of cargo each year safely and efficiently. This includes more than 80 percent of New England's home heating oil, 60 percent of U.S. export grain and significant bulk and containerized cargoes transported along the Atlantic Coast. On behalf of AWO's over 300 member companies, we appreciate the opportunity to comment on the U.S. Bureau of Ocean Energy Management's call for information and nominations for the proposed Wind Energy Areas within the New York Bight region.

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 is committed to the goal of zero harm from our industry's operations – to human life, to the environment and to property. To this end, AWO has worked closely with BOEM over the last several years to ensure navigation safety is considered during the development of wind energy areas (WEAs).

We have also worked with the U.S. Coast Guard on the development of the agency's Atlantic Coast Port Access Route Study (ACPARS), which includes information on towing vessel navigation safety provided by AWO members to help inform BOEM's WEA siting processes.

It is critical that offshore projects do 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.

AWO members involved in coastwise trade routinely travel through the New York Bight region. The MARCO Data Portal below shows in yellow the high density of towing vessel traffic transiting from Delaware Bay to New York Harbor and hugging the coasts of New Jersey and New York. As the image below demonstrates, the proposed WEAs have been placed far enough offshore that they avoid creating conflicts with this traditional tug and barge traffic.



However, AWO is concerned that the proposed WEAs will eliminate another important route for tug traffic heading Northeast into New England. It is common practice for tows bound for the Cape Cod Canal to head northeast past Barnegat, NJ toward Montauk on Long Island. This allows operators to cross and meet New York-bound ship traffic southeast of the defined traffic separation scheme, where there is more room to maneuver. This convergence of towing vessel routes is visible in the map above in the form of the thick blue line practically cutting through the middle of the proposed WEAs. This route is commonly used by both northbound and southbound tug traffic.

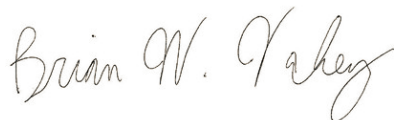
Placing wind farms in this part of New York and New Jersey waters would eliminate an important route for operators transiting to and from New England. It would force tows to take one of two alternative paths around the wind farms, neither of which is optimal from a safety perspective. First, tugs bound for the Cape Cod Canal could transit farther north along the

New Jersey Coast before heading east toward Long Island. This would force them to navigate into a congested and constricted space and require them to cross three traffic separation schemes in the transit east. Second, towing vessel operators could elect to cut across toward Montauk farther south along the New Jersey coast, closer to Cape May. This would force tows to operate much farther offshore, subjecting smaller towing vessels to rougher seas and harsher weather conditions. This would have significant impacts on both the safety and efficiency of AWO member operations. As discussed in the ACPARS final report, operators would likely elect not to transit that far offshore during inclement weather, resulting in significant delays.

While AWO appreciates BOEM's effort to accommodate traditional tug routes heading to New York Harbor, it is imperative that the proposed WEAs are altered in a way that they also accommodate vessels transiting via the track from the New Jersey coast to Long Island and back. One way of doing this would be to create a 9-nm-wide lane through the proposed WEAs to allow the safe transit of both northbound and southbound towing vessel traffic through the New York Bight region. This would be consistent with the Coast Guard's safety recommendations in ACPARS, it would protect traditional towing vessel navigation, and it would ensure the continued safety and viability of future WEAs off the New York and New Jersey coasts.

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