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Docket: BOEM-2011-0005

Commercial Leasing for Wind Power on the Outer Continental Shelf (OCS) Offshore New Jersey –
Call for Information and Nominations

Comment On: BOEM-2011-0005-0001

Commercial Leasing for Wind Power; Call for Information and Nominations Outer Continental Shelf
Offshore New Jersey

Document: BOEM-2011-0005-DRAFT-0023

Comment from Lynn Muench, organization

Submitter Information

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Organization: American Waterways Operators

General Comment

See attached file(s)

Attachments

BOEM-2011-0005-DRAFT-0023.1: Comment from Lynn Muench, organization



The American Waterways Operators

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Lynn M. Muench

Senior Vice President - Regional Advocacy

June 6, 2011

Bureau of Ocean Energy Management, Regulation and Enforcement
Office of Offshore Alternative Energy Programs
381 Elden Street
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Herndon, VA 20170

RE: Commercial Leasing for Wind Power
on the Outer Continental Shelf Offshore
New Jersey—Call for Information and
Nominations. (Docket No. BOEM-2011-
0005)

Dear Sir or Madam:

The American Waterways Operators is the national trade association for the tugboat, towboat and barge industry. AWO's member companies operate on the coasts, the inland rivers and in the Great Lakes, safely and efficiently moving more than 800 million tons of cargo per year critical to the U.S. economy. Over 20 AWO companies operate in the Port of New York/New Jersey, providing coastal and inland towing and ship assist services. Moreover, the coast of New Jersey is heavily trafficked by towing vessels as they make their way to and from New York Harbor and beyond.

AWO members are proud to be part of an industry that is the safest, 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 practices and environmental stewardship that is a condition of AWO membership.

AWO's commitment to environmental stewardship includes support of the exploration 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. Obstacles to the use of historical towing routes that force tugs and barges to deviate from their usual navigational routes in order to avoid wind turbines can waste up to 100 gallons of fuel an hour and add hours to transit times.

This will lead to increased costs in the transportation of essential commodities that are the building blocks of our national economy, increased air emissions, and product delivery delays. Additionally, tugboats are not as equipped to withstand inclement weather, so diverting traffic out to rougher seas can cause serious safety and environmental issues.

To mitigate these concerns, AWO supports the U. S. Coast Guard's Port Access Route Study (PARS), which will clearly define current vessel traffic routes. Using data developed through the PARS 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. ***AWO requests that no leases be granted until after the PARS study is completed, the results are analyzed by and discussed with the navigation industry, and fairways are established.***

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 cursive script that reads "Lynn M. Muench". The signature is written in black ink and is positioned above the printed name.

Lynn M. Muench