

From: **MidAtlanticRPB, BOEM** <boemmidatlanticrpb@boem.gov>
Date: Wed, Jul 19, 2017 at 10:36 AM
Subject: Re: Comments on the June 20th Mid-Atlantic RPB Meeting and the 2017 Draft Annual Work Plan and Progress Report
To: "Chase, Alison" <achase@nrdc.org>
Cc: "McKay, Laura (DEQ)" <Laura.McKay@deq.virginia.gov>, "lisa.croft@noaa.gov" <lisa.croft@noaa.gov>, "KelseyLeonard@shinnecock.org" <KelseyLeonard@shinnecock.org>, "MidAtlanticRPB@boem.gov" <MidAtlanticRPB@boem.gov>

Thank you for the comments on behalf of several organizations regarding the June 20 MidA RPB meeting and the 2017 Draft Annual Work Plan and Progress Report. We appreciate your suggestions and your participation during the MidA RPB meeting in Silver Spring, Maryland.

We will share your letter with the members of the MidA RPB for consideration as we continue our work. We will also post your letter to the written public comments section on the MidA RPB webpage. Please continue to contact us with any additional comments you may have.

On Tue, Jul 18, 2017 at 2:47 PM, Chase, Alison <achase@nrdc.org> wrote:

Attached please find a letter from several organizations regarding the Mid-Atlantic Regional Planning Body's recent meeting and the *2017 Draft Annual Work Plan and Progress Report*. Please feel free to contact me with any questions at 212.727.4551.

Sincerely, Ali Chase

ALISON CHASE
Senior Policy Analyst

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Please save paper.

Think before printing.

**American Littoral Society • Natural Resources Defense Council • Surfrider Foundation •
Wild Oceans • Wildlife Conservation Society**

July 18, 2017

Ms. Lisa Croft
Fisheries Policy Analyst
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Silver Spring, Maryland 20910

Ms. Laura McKay
Program Manager
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Ms. Kelsey Leonard
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Southampton, New York 11969

Submitted electronically via MidAtlanticRPB@boem.gov

Re: Comments on the June 20th Mid-Atlantic Regional Planning Body meeting and the 2017 Draft Annual Work Plan and Progress Report

Dear Ms. Croft, Ms. Leonard, and Ms. McKay,

On behalf of our organizations and their millions of members and activists, thank you and the other Mid-Atlantic Regional Planning Body (MidA RPB or RPB) members for your work over the past several years to develop the *Mid-Atlantic Regional Ocean Action Plan* (Plan) and for the June 20th RPB meeting to update stakeholders and the public on Plan implementation and solicit feedback on the *2017 Draft Annual Work Plan and Progress Report* (Work Plan).¹ We appreciate your efforts to address the challenges facing our ocean's health and sustainable use in a more transparent and proactive way, and congratulate you on your progress thus far with Plan implementation. Below please find our recommendations on the Work Plan and meeting.

- I. We encourage the RPB's continued support of efforts to identify and increase understanding of ecologically rich areas.

We reiterate our deep support for efforts to identify and increase understanding of the special ocean places where we find high diversity and abundance of wildlife and the habitats they depend on, also known as ecologically rich areas (ERAs). Providing managers, businesses, and other stakeholders with information on the offshore areas critical to the continued functioning of our ocean's ecosystem allows

¹ Additional information on meeting details and the Work Plan are *available at* <https://www.boem.gov/MidA-RPB-Public-Meeting-June-2017/>.

for better development decisions. As our organizations have previously stated,² we urge you to prioritize the ERA work as an RPB and within your agencies to allow for: 1.) posting of final peer-reviewed data layers showing the five components of ecological importance³ on the Mid-Atlantic Ocean Data Portal (Portal) by the end of 2017; 2.) posting of a final ERA summary map (synthesizing all five components) on the Portal in early 2018; and, 3.) updates to these maps alongside any base layer updates to ensure the products represent our most up-to-date understanding of the marine system. We recommend that the RPB select initial pilots – one that best represents an area of regional importance and a second area that is experiencing significant stresses and where management efforts could help sustain the area’s natural balance – *after* completing ERA component layers so that we know we are selecting areas of ecological importance for the region.⁴

Promoting a common RPB message on this effort’s value and progress is essential to its success and we endorse the Work Plan’s call for additional ERA stakeholder workshops and RPB materials like a fact sheet with FAQs, which clearly defines what an ERA is, what has been accomplished, and steps for public engagement.⁵ We look forward to further discussions of pilot criteria at the November workshop and December meeting.

II. The Work Plan should detail progress on the Plan’s Best Practices for Enhanced Coordination.

The Work Plan inexplicably lacks a section showcasing steps to attain the Plan’s Best Practices for Enhanced Coordination.⁶ It is this commitment to increased and early collaboration and open, transparent dialogue and planning among those who manage competing uses in the ocean, which marks the Plan as a milestone in good governance. We recommend the RPB outline for discussion at its December meeting the beginnings of an early stakeholder notification approach which would help stakeholders be more engaged upfront in the vetting and design of various projects, when feedback is most valuable and when developers have more flexibility.⁷ We suggest forming a RPB working group with relevant stakeholders representing industry, non-consumptive recreation, and the conservation communities to develop a sample proposal. This proposal and a timeline for it should be incorporated into the December iteration of the Work Plan.

III. The Work Plan should be updated no less than twice a year and link to relevant RPB documents to encourage enhanced stakeholder engagement.

² Please see the letter sent to the RPB dated June 16, 2017, “Re: Recommendations from the May 19th Ecologically Rich Areas Workshop.”

³ Plan’s Appendix 4, *Draft Framework for Identification of Ecologically Rich Areas*, available at <https://www.boem.gov/Ocean-Action-Plan/>.

⁴ Additional detail on this topic is available in the letter many of our organizations sent to the RPB dated June 16, 2017, “Re: Recommendations from the May 19th Ecologically Rich Areas Workshop.”

⁵ Work Plan at 4-7, available at <https://www.boem.gov/Draft-2017-Annual-Work-Plan-and-Progress-Report/>.

⁶ Plan at 31-7, available at <https://www.boem.gov/Ocean-Action-Plan/>.

⁷ See, for example, the Plan at 35: “Project proponents should seek to identify, engage, and incorporate information from stakeholders before filing a permit application or otherwise formally initiating the environmental review and permitting process, to ensure that stakeholder information helps inform both the project application and subsequent public, stakeholder, and agency review.”

The Work Plan provides an important window for stakeholders on Plan implementation and, as such, we appreciate the RPB's stated commitment to update it at least every six months and strongly support the RPB's decision to meet in public twice yearly to review progress and allow for comment. We recommend posting the Work Plan front and center on the RPB's website and including in it hyperlinks to prepared documents and materials from workshops and other meetings so that it is possible for readers to easily find the referenced information, as this kind of detail is occasionally removed online once an event has occurred. We also recommend the Work Plan include a chronological timeline of upcoming Plan work, which would help encourage stakeholder turnout at meetings and show the breadth of RPB agencies' efforts.

IV. Incorporate success stories into the Work Plan while the Performance Monitoring and Evaluation Plan Tracker is under development.

We suggest that elements of the Work Plan's proposed Performance Monitoring and Evaluation Plan (PM&E) Tracker (Tracker) be factored into the Work Plan now, as the Tracker is developed. For example, folding success stories into the Work Plan would encourage continued momentum for Plan implementation and lend support to regional ocean planning efforts overall. Success stories from both the agencies and the stakeholder community could be captured in a new column of the Work Plan to help convey the RPB's progress. We encourage a "live" Work Plan similar to what is described for the Tracker with individual Work Groups able to update next steps, information gaps, and needs on a rolling basis and allow stakeholders and the public to follow Plan implementation throughout the year, in between RPB meetings and individual workshops.

We urge you to keep the Tracker as an easily accessible chart of Plan implementation. The Tracker should include for each Plan section and action, measureable outcomes (*e.g.*, development of updated agency guidance could serve as an indicator metric), compelling stories (which could be reported or linked to success stories from the Work Plan), and a link to Work Plan details, rather than a reiteration of the particular Work Group's progress.⁸ As the RPB completes Plan actions, the Work Plan should then be updated with a new link to a write up of the Work Group's measurable achievements and learning as well as providing prior Work Plan details so as not to lose an understanding of the work details and how they evolved.

Our organizations have previously noted⁹ the value of having the PM&E incorporate measures to evaluate public involvement and satisfaction.¹⁰ As we learn from Plan implementation and as new

⁸ As stated in the Plan at 101, "... the RPB will develop a [PME plan] to provide the RPB, stakeholders, and the public with the tools to determine whether and how effectively the planning actions implemented by the RPB are achieving the specific objectives they are intended to advance. Key components of this PME plan will be the Framework goals and objectives, interjurisdictional coordination actions presented in this Plan, and a series of indicators ... that will be used to measure the effectiveness of specific actions." Additional details are at Appendix 6, available at <https://www.boem.gov/Mid-Atlantic-Regional-Ocean-Action-Plan/>.

⁹ Please see the letter sent to the RPB dated September 2, 2016, "Re: Recommendations on the draft *Mid-Atlantic Regional Ocean Action Plan*."

¹⁰ This idea is supported in the Plan's Appendix 6: "Indicators that measure and evaluate Plan progress by focusing on actions related to addressing institutional coordination, *stakeholder engagement and satisfaction*, and the achievement of

issues, data, and ocean uses arise, also having a specific online mechanism for stakeholders to formally request that the RPB address a management issue would enhance Plan performance and engagement. A general framework could include: 1.) a stakeholder submitting a formal comment to the RPB; 2.) RPB Co-Leads deciding within three months of receiving a comment whether or not to take up the issue; and, 3.) if the issue is prioritized for discussion, an RPB forum is held to discuss improvements to the Plan with federal agencies, states, tribes, and stakeholders.¹¹

V. Ensure robust opportunities for public participation at RPB meetings.

We enjoyed the opportunity at the June 20th RPB meeting to speak one-on-one with agency staff during the Topic Station discussions, but recommend that this not be considered as a substitute for more in-depth table discussions where stakeholders not only have time to ask questions, but are asked for feedback from RPB members and hear the comments from their fellow stakeholders. **We also request that future RPB meetings make clear in advance the actionable items that the RPB wishes public feedback on so that we can best tailor our organizations' remarks to advise the decisions at hand.**

Thank you for the opportunity to continue to share our thoughts on the Plan with you. We congratulate you on your success in Plan implementation to date and look forward to continuing to work with you and your agencies to benefit our region's ocean and its users.

Sincerely,

Alison Chase
Senior Policy Analyst
Natural Resources Defense Council

Pam Lyons Gromen
Executive Director
Wild Oceans

Matt Gove
Mid-Atlantic Policy Manager
Surfrider Foundation

Sarah Winter Whelan
Ocean Policy Program Director
American Littoral Society

Merry Camhi, PhD
Director, New York Seascape
Wildlife Conservation Society
New York Aquarium

implementation Plan milestones may provide managers, stakeholders, and the public with more useful information by which to assess progress." Emphasis added.

¹¹ Please see the letter sent to the RPB dated September 2, 2016, "Re: Recommendations on the draft *Mid-Atlantic Regional Ocean Action Plan*."

From: **MidAtlanticRPB, BOEM** <boemmidatlanticrpb@boem.gov>
Date: Fri, Jul 21, 2017 at 1:46 PM
Subject: Re: NOPC Comment Letter on Draft Work Plan
To: Brent Greenfield <brent.greenfield@oceanpolicy.com>

Thank you for the NOPC comments regarding the 2017 Draft Annual Work Plan and Progress Report. We appreciate your suggestions and we will share your letter with the members of the MidA RPB for consideration as we continue our work. We will also post your letter to the written public comments section on the MidA RPB webpage. Please continue to contact us with any additional comments you may have.

On Thu, Jul 20, 2017 at 7:45 PM, Brent

Greenfield <brent.greenfield@oceanpolicy.com> wrote:

Attached please find comments from the National Ocean Policy Coalition on the Mid-Atlantic Regional Planning Body's Draft Annual Work Plan and Progress Report.

Sincerely,
Brent

Brent Greenfield
Executive Director
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July 20, 2017

Ms. Lisa Croft
Mid-Atlantic Regional Planning Body Federal Co-Lead
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Ms. Laura McKay
Mid-Atlantic Regional Planning Body State Co-Lead
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Ms. Kelsey Leonard
Mid-Atlantic Regional Planning Body Tribal Co-Lead
Shinnecock Indian Nation
PO Box 5006
Southampton, NY 11969

Submitted Electronically via MidAtlanticRPB@boem.gov

RE: 2017 Draft Annual Work Plan and Progress Report

Dear Ms. Croft, Ms. McKay, and Ms. Leonard:

The National Ocean Policy Coalition (“Coalition”) submits the following comments to the Mid-Atlantic Regional Planning Body (“RPB”) in response to the June 2017 publication of the 2017 Draft Annual Work Plan and Progress Report (“Draft Work Plan”).¹

The Coalition urges the RPB not to proceed with further implementation of Plan actions unless and until agencies have clearly and transparently explained and achieved user group consensus on both (1) how agencies intend to incorporate and apply such actions in their activities and decision-making, and (2) any related agency implementing instructions, including through the use of mechanisms for formal public notice and comment proceedings and compliance with the Administrative Procedure Act (APA).

In a November 2016 *Federal Register* notice announcing the submittal of the Mid-Atlantic Regional Ocean Action Plan (“Plan”) to the National Ocean Council for certification, federal agencies and their relevant counterparts represented on the RPB committed to, among other things “describe the way the agency will use the Plan to inform and guide its actions and decisions in or affecting the Mid-Atlantic

¹ <https://www.boem.gov/Draft-2017-Annual-Work-Plan-and-Progress-Report/>

regional ocean planning area” and “explain its use of the Plan” in its activities.² The RPB reaffirmed those commitments in a subsequent Plan Adoption Memo.³

The Draft Work Plan released in June contains a number of actions proposed for completion in 2017 and 2018, including actions related to the identification of “ecologically rich areas” (“ERAs”) and the development of Mid-Atlantic ocean health indicators. Yet, it is still unclear how RPB agencies will use these products in their activities.

As the Coalition previously commented,⁴ among other Plan elements, actions involving the identification and regulatory application of ERAs are of great concern to commercial and recreational interests. Identifying and applying ERAs in the absence of legislatively-established criteria and guidance threatens to introduce significant legal uncertainty and potential statutory conflicts and increase the risk that such products could be misused or misinterpreted. The absence of clear and specific information on how agencies would implement and apply the ERA actions in their activities further increases their associated risks and uncertainties, makes public engagement and reviews of little or no value, and is inconsistent with the RPB’s previous commitments to make such information available. The lack of analyses on the potential consequences and statutory basis for agency implementation of ERA-related actions compounds such risks.

Under the Draft Work Plan, implementation would also proceed in the absence of clear metrics for Plan performance and ocean ecosystem health. The Coalition continues to find that this sequence of activities – implementing the Plan before identifying ways to evaluate its effectiveness – is flawed. It suggests and reinforces a lack of clarity about what the Plan is supposed to achieve, and makes it difficult for the public and affected parties to hold the RPB accountable for those consequences and impacts stemming from its decisions. Before taking any further steps with Plan implementation, the Coalition thus also urges the RPB to propose a clear system with monitoring and evaluation indicators, methods, tools, goals, and analyses that would provide user groups, stakeholders, and the public with adequate opportunities to consider and formally comment and engage on these critical elements.

Lastly, the Draft Work Plan includes a number of actions that would require the commitment of significant but unknown levels of federal resources at a time of significant budget constraints that impact the ability of agencies to perform core, statutorily-authorized and mandated missions. Before finalizing the Work Plan and taking any further actions, the Coalition therefore urges the RPB to revise the Draft Work Plan to disclose the resources (in-kind and otherwise) that would be applied to implement the Draft Work Plan actions and activities, and to re-release the Draft Work Plan for public review and comment.

For the foregoing reasons, the Coalition urges the RPB to cease implementation of the Draft Work Plan unless and until RPB agencies have clearly and transparently explained and achieved user group consensus on both (1) how agencies intend to incorporate and apply such actions in their activities and decision-making, and (2) any related agency implementing instructions, including through the use of mechanisms for formal public notice and comment proceedings and compliance with the Administrative Procedure Act (APA).

² <https://www.gpo.gov/fdsys/pkg/FR-2016-11-03/pdf/2016-26623.pdf>

³ <https://www.boem.gov/Mid-Atlantic-Regional-Plan-Adoption-Memo/>

⁴ https://gallery.mailchimp.com/6bb66fed099f6eb4e4253667e/files/NOPC_Comments_on_Draft_MidA_OAP_.pdf

Before moving forward, the Coalition also urges the RPB to propose a clear system with monitoring and evaluation indicators, methods, tools, goals, and analyses that would provide user groups, stakeholders, and the public with adequate opportunities to consider and provide formal comments and input on these critical elements, revise the Draft Work Plan to disclose the resources (in-kind and otherwise) that would be applied to implement the listed RPB actions and activities, and re-release the Draft Work Plan for public review and comment.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink that reads "Brent A. Greenfield". The signature is written in a cursive style with a clear, legible font.

Brent Greenfield
Executive Director
National Ocean Policy Coalition

From: **MidAtlanticRPB, BOEM** <boemmidatlanticrpb@boem.gov>
Date: Fri, Jul 21, 2017 at 1:50 PM
Subject: Re: Comments on the 2017 Draft Annual Work Plan and Progress Report
To: Anne Merwin <amerwin@oceanconservancy.org>

Thank you for the Ocean Conservancy comments regarding the 2017 Draft Annual Work Plan and Progress Report. We appreciate your suggestions and we will share your letter with the members of the MidA RPB for consideration as we continue our work. We will also post your letter to the written public comments section on the MidA RPB webpage. Please continue to contact us with any additional comments you may have.

On Thu, Jul 20, 2017 at 8:10 PM, Anne Merwin <amerwin@oceanconservancy.org> wrote:
Please see attached comments from Ocean Conservancy on the 2017 Draft Annual Work Plan and Progress Report. Thank you for your consideration.

Best,
Anne Merwin

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July 20, 2017

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Program Manager
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Submitted electronically via MidAtlanticRPB@boem.gov

Re: Comments on the 2017 Draft Annual Work Plan and Progress Report

Dear Mid-Atlantic Regional Planning Body Co-Leads:

Ocean Conservancy has supported and engaged in the ocean planning process since the beginning. We applaud the progress the Mid-Atlantic Regional Planning Body (RPB) has made since the finalization of the region's first Ocean Action Plan (OAP) earlier this year. We appreciate the opportunity to comment on the Draft Annual Work Plan and Progress Report, and are eager to see the Work Plan actions identified for the remainder of 2017 fully carried out.

We would like to commend the RPB for its timely release of the Work Plan and Progress Report for 2017. Transparency and effective multi-sector engagement are core principles of the ocean planning process. Using work plans and progress reports to ensure that both RPB members and the public have a common understanding of key outcomes and priority activities and milestones is a helpful way to operationalize those core principles. We urge the RPB to continue issuing updated progress reports and work plans on a regular basis as it moves forward implementing the OAP.

The Work Plan contains several pieces of information that we believe are helpful practices for facilitating stakeholder engagement. First, the document outlines workgroup members associated with the OAP goals (*sustainable ocean uses and healthy ocean ecosystems*), actions (*national security, commercial and recreational fishing, ocean aquaculture, maritime commerce, sand management, non-consumptive recreation, and tribal*

interests and uses), and the Data Portal. The ability to access and contact specific workgroup members allows stakeholders who may have questions or comments about specific actions that may affect their industry to easily engage in the management process. This, in turn, leads to transparency in the process and ultimately in more informed and efficient management decisions. Second, the report specifically lists public stakeholder input opportunities action-by-action. This is a helpful reference tool for stakeholders who are looking to engage with the RPB on specific issues. We encourage the RPB to continue including and updating these elements in future iterations of the Work Plan.

We were pleased to see detailed and actionable milestones included for the Healthy Ocean Ecosystems, Maritime Commerce and Navigation, and Data Portal sections of the Work Plan. It is clear that the RPB has spent significant time considering how best to implement these elements of the OAP, and we fully support these actions. In particular, the Mid-Atlantic Ocean Data Portal is a critical component and essential tool to ensure the successful use and long-term implementation of the OAP. We urge the RPB to maintain their commitments and Work Plan obligations to regularly update, maintain, and further develop the data portal and its associated data products. We look forward to partnering with the RPB to support meeting the milestones identified in these sections.

In future iterations of the Work Plan, we encourage the RPB to include milestones for implementing Section 2.1 of the OAP, “Best Practices for Enhanced Coordination.” The actions contained in this section of the plan are important good governance and stakeholder engagement measures, and we would like to see the RPB further develop and implement these best practices.

We also found the Progress Report element of the Work Plan to be a helpful tool. Demonstrating the practical value and real-world outcomes of the planning process are critical to the long-term durability of the regional planning effort. We encourage the RPB to continue and expand on this practice of articulating concrete achievements, either in the work plans themselves or in a separate monitoring and evaluation report. We recommend the RPB also consider developing more detailed “case studies” similar to the Northeast RPB as a way to clearly communicate progress in addition to the type of summary outcome information provided in the draft progress report.

Thank you again for the opportunity to comment. We urge the RPB to continue its good work during plan implementation and look forward to working with the RPB on future iterations of the Work Plan.

Sincerely,

Anne Merwin
Director of Ocean Planning

From: **MidAtlanticRPB, BOEM** <boemmidatlanticrpb@boem.gov>
Date: Fri, Jul 21, 2017 at 1:58 PM
Subject: Re: AWO Comments on Draft Annual Work Plan and Progress Report
To: Brian Vahey <BVahey@americanwaterways.com>

Thank you for the AWO comments regarding the 2017 Draft Annual Work Plan and Progress Report. We appreciate your suggestions and we will share your letter with the members of the MidA RPB for consideration as we continue our work. We will also post your letter to the written public comments section on the MidA RPB webpage. We also wanted to let you know that Bob LaBelle has retired and Lisa Croft of NOAA is now the federal co-lead; please continue to contact the MidA RPB with any additional comments you may have.

On Thu, Jul 20, 2017 at 10:07 PM, Brian Vahey <BVahey@americanwaterways.com> wrote:
Attached please find AWO's comments on the MidA RPB's Draft Annual Work Plan and Progress Report. Thank you.

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Brian Vahey
Senior Manager – Atlantic Region

July 18, 2017

Mr. Robert P. LaBelle
MidA RPB Federal Co-Lead
U.S. Bureau of Ocean Energy Management
45600 Woodland Road
Sterling, VA 20166

Re: Request for Comment on the
2017 Draft Annual Work
Plan and Progress Report

Dear Mr. LaBelle:

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. On behalf of AWO's 350-member companies, we appreciate the opportunity to comment on the Mid-Atlantic Regional Planning Body's (MidA RPB) Draft Annual Work Plan and Progress Report.

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.

The oceans are an invaluable source of food and livelihood for many Americans. How the water is managed impacts human health, the environment and homeland security. An endeavor that seeks to manage the world's largest resource, therefore, must be undertaken carefully and with significant stakeholder input. AWO has engaged several governmental bodies including the Mid-Atlantic Regional Council on the Ocean (MARCO) and the MidA RPB to enhance MARCO's and MidA RP's understanding of the tug and barge industry and of future trends that will impact shipping along the Atlantic Coast.

AWO urges the MidA RPB to include the navigation route boundaries and the nine-mile safe navigation corridor recommended in the Atlantic Coast Port Access Route Study (ACPARS) in MARCO's Mid-Atlantic Ocean Data Portal to ensure vessels can safely navigate along the Atlantic Coast. The ACPARS report was finalized earlier this year after a lengthy comment period, and no changes were made to the version of the report published in 2016. The goal of ACPARS is to ensure safety, environmental protection and economic viability for the Atlantic Ocean including maritime stakeholders. The report has strong support from maritime stakeholders.

The corridor will help the Administration make sound decisions. AWO has repeatedly urged the Bureau of Ocean Energy Management (BOEM) to wait for the final ACPARS recommendations before siting potential Wind Energy Areas (WEAs). Despite the need to make informed and long-term decisions, the agency has continued to publish leasing opportunities without proper consideration for the Coast Guard recommended safe navigation corridor, marine planning guidelines and other important safety recommendations included in ACPARS that is strongly supported by maritime stakeholders. By incorporating the safe navigation corridor into the Mid-Atlantic Ocean Data Portal, the MidA RPB and MARCO will encourage BOEM to use this crucial information and help ensure that future WEAs are not sited in a way that puts navigation safety, human life or the environment in jeopardy.

Although the MidA RPB's Draft Ocean Plan did not mention ACPARS, and it is not referenced in this draft work plan, AWO was encouraged to see the study recognized in the Northeast Regional Planning Body's Draft Ocean Plan published last year. In that plan, the NE RPB noted that the ACPARS final report offers additional safety guidance that can be used to help the government and other stakeholders make decisions impacting waterways navigation, including the placement of offshore structures.

AWO firmly believes that inclusion of the safe navigation corridor into the data portal will facilitate this vision. The safe navigation corridor and marine planning guidelines are the result of hundreds of hours of consultation with seasoned captains and state-of-the-art quantitative analysis by Coast Guard and industry experts. Data can only effectively drive policy decisions when it is accurate and comprehensive, and the corridor was developed with the best data available on towing vessel navigation along the Atlantic Coast.

AWO strongly recommends the inclusion of the safe navigation corridor into MARCO's data portal to further enhance navigational safety on the Atlantic Coast. Thank you for the opportunity to comment. AWO would be pleased to answer any questions or provide further information as the agency sees fit.

Sincerely,



Brian W. Vahey