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Brian W. Vahey
Director – Atlantic Region

December 4, 2022

Dr. Caroline Good
Office of Protected Resources
National Marine Fisheries Service
1315 East-West Highway, 13th Floor
Silver Spring, Maryland, 20910

Re: BOEM/NOAA Offshore Wind
Strategy (BOEM-2022-0066)

Dear Dr. Good:

The American Waterways Operators (AWO) is the tugboat, towboat and barge industry's advocate, resource, and united voice for safe, sustainable, and efficient transportation on America's waterways, oceans, and coasts. Our industry is the largest segment of the nation's 40,000-vessel domestic maritime fleet and moves 665 million tons of cargo each year safely and efficiently. On behalf of AWO's more than 300 member companies, we appreciate the opportunity to comment on BOEM and NOAA Fisheries' North Atlantic Right Whale and Offshore Wind Strategy.

AWO members lead the maritime industry in safety, security, and environmental stewardship. We are committed to working with federal and state agencies to advance these shared objectives. AWO companies from across the industry are working to build on the natural advantages of marine transportation by making investments to further reduce our environmental impact. Our commitment to environmental stewardship includes not only support for the marine life with which we share our waters, but also aiding the development of offshore wind energy.

AWO applauds NOAA and BOEM for developing a strategy to ensure the safe coexistence of wind turbines and marine life. We believe that the particular emphasis on gathering data on right whale populations and engaging stakeholders is key. However, we urge both agencies to ensure that the towing industry – and indeed, every segment of the commercial maritime industry operating in impacted areas – is engaged as this strategy is implemented.

AWO members will be involved in the construction and operation of wind farms and subjected to speed restrictions to protect right whale populations, and we have vital information to

provide on how any strategies or decisions will impact navigation safety – both for vessels supporting the wind farms and others operating in coastwise trade in the vicinity of the turbines. We also urge NOAA and BOEM to consult closely with the Coast Guard, the lead agency on maritime safety, throughout this ongoing process.

As we noted in previous comments to NOAA on its proposed expansion of speed restrictions, an operating environment of this complexity requires a nuanced regulatory scheme. We believe that can be achieved by good communication and coordination among NOAA, BOEM, the Coast Guard and other relevant government agencies, and maritime stakeholders to develop a sound strategy.

AWO members stand at the ready to work with NOAA and BOEM on this important effort and thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Brian W. Vahey". The signature is written in a dark ink and is positioned above the typed name and title.

Brian Vahey
Director – Atlantic Region