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Peter J. Schrappen, CAE  
Vice President – Pacific Region

February 16, 2024

Ms. Lisa Gilbane  
Pacific Regional Office of Environment  
Bureau of Ocean Energy Management  
760 Paseo Camarillo, Suite 200  
Camarillo, CA 93010

Re: Notice of Intent to Prepare a  
Programmatic Environmental  
Impact Statement for Future  
Floating Wind Energy  
Development Related to 2023  
Leased Areas Offshore California  
(Docket No. BOEM-2023-0061)

Dear Ms. Gilbane:

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 the Notice of Intent to Prepare a Programmatic Environmental Impact Statement (PEIS) for California's offshore wind leases.

AWO members lead the maritime industry in safety, security, and environmental sustainability. We are committed to working with federal and state agencies to advance these shared objectives. Our commitment to sustainability includes strong support for the development of renewable energy resources. However, such projects should not jeopardize navigation with hazards that put vessels and their crews at risk or obstruct the movement of essential commodities. With these concerns in mind, we will continue to work closely with the Bureau of Ocean Energy Management and the U.S. Coast Guard on offshore wind energy development.

Disrupting traditional navigation routes creates unintended consequences and could cause increased risks to mariner safety, as well as environmental and economic harm. This PEIS should examine impacts to safe navigation that these leases will cause. For example, more

vessels, like those needed to construct and maintain offshore wind farms, could compete for space in increasingly crowded transit lanes. The PEIS should also consider potential challenges that may arise from floating offshore wind turbines. Do floating turbines introduce unique risks to vessels not seen in fixed-bottom structures? Additionally, offshore export cable routes and burial depths have the potential to interfere with safe navigation in the event of anchor strikes. The PEIS should examine the impact of undersea power cables on safe navigation and ways of mitigating these impacts by adhering to safety practices such as crossing navigation routes perpendicularly and burying cables 15 feet where they intersect navigation channels.

The Coast Guard's Pacific Coast Port Access Route Study (PACPARS) recommended a system of shipping safety fairways that should account for vessel traffic along the West Coast. BOEM should continue to collaborate with the Coast Guard to ensure that leases do not overlap with the final fairways, and any alternatives explored by the PEIS should account for the location of the fairways and the impacts this will have on vessel navigation. As the Coast Guard's rulemaking process is still underway and fairways have not been finalized, any mitigation measures resulting from this PEIS should be adaptable to accommodate the final fairways.

While offshore wind promises environmental and economic benefits, human safety must remain paramount. Put another way: We should not jeopardize navigation safety as we develop this exciting new field of renewable energy.

Thank you for the opportunity to comment on this emerging issue. AWO would gladly answer any questions or provide further information as BOEM sees fit. Our 80-year history demonstrates our commitment to tugboats, towboats, and barges moving safely through our nation's waterways while serving the nation's supply chain.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Schrapen". The signature is fluid and cursive, with a large initial "P" and a long, sweeping underline.

Peter Schrapen  
Vice President – Pacific Region