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Brian W. Vahey  
Vice President – Atlantic Region

February 12, 2024

Ms. Jessica Stromberg  
Office of Renewable Energy Programs  
Bureau of Ocean Energy Management  
Woodland Road, VAM-OREP, Sterling, VA 20166

Re: Notice of Availability of a Draft  
Environmental Assessment for  
Commercial Wind Lease Issuance  
and Site Assessment Activities on  
the Atlantic Outer Continental  
Shelf Offshore Delaware,  
Maryland, and Virginia (Docket  
No. BOEM-2024-00513)

Dear Ms. Stromberg,

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 Availability of the Draft Environmental Assessment for the Central Atlantic Wind Energy 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, it is critical that such projects do not produce navigational hazards that put vessels and their crews at risk or obstruct the movement of commodities on which the nation's economy depends. It is with these concerns in mind that we have worked closely with the Bureau of Ocean Energy Management and the U.S. Coast Guard on previous requests for comment regarding offshore wind energy development.

In our previous comments to BOEM, AWO has evaluated the environmental impact of the proposed placement of WEAs based on two primary criteria: whether vessel operators will

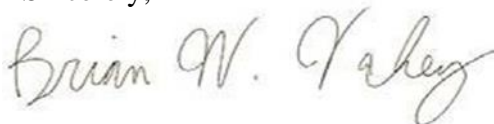
have the space to navigate safely along traditional towing vessel transit lanes, and whether mariners will have options to adjust their course if circumstances demand. Ensuring that these two criteria are met will reduce the likelihood of collisions and allisions with wind farms and improve the ability of vessel operators to right a vessel in the event of an emergency; these protective measures will in turn reduce the chance of an environmental incident.

We therefore appreciate that BOEM has removed from future lease consideration some of the proposed WEAs that would have conflicted with the Coast Guard's proposed fairways as outlined in the agency's Shipping Safety Fairways Along the Atlantic Coast Notice of Proposed Rulemaking (NPRM). While we are currently evaluating our response to the recently released NPRM to ensure the safety and efficiency of the proposed fairways themselves, we urge BOEM to continue working with the Coast Guard to ensure that the lease areas BOEM ultimately puts out for bid will not encroach on the available sea space the Coast Guard needs to develop fairways that are safe for navigation, wind farms, the environment, and personnel on both vessels and platforms.

AWO members do not wish to discourage BOEM from continuing its discussions with stakeholders to identify future WEAs offshore Delaware, Maryland, and Virginia. Indeed, once offshore navigation routes have been protected through the promulgation of the Coast Guard's final fairway rulemaking, we support the continued proliferation of WEAs throughout the Atlantic. Offshore wind holds the promise of improved sustainability, new jobs, and increased economic activity, and while AWO's primary focus will remain on navigation safety, we look forward to discussing options for future wind energy development.

Thank you again for the opportunity to comment. I would be pleased to provide additional comments or further information as you see 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 printed name and title.

Brian Vahey  
Vice President – Atlantic Region