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Peter J. Schrappen, CAE  
Vice President – Pacific Region

February 6, 2025

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

Re: Notice of Availability of the  
California Offshore Wind Draft  
Programmatic Environmental  
Impact Statement (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 draft 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 risk to mariner safety, as well as environmental and economic harm. To this end, the final PEIS should continue to acknowledge the navigation safety fairways proposed by the Coast Guard in the Pacific Coast Port Access Route Study. As more vessels, like those needed to construct and maintain offshore wind farms, compete for space in increasingly crowded

transit lanes, adequate navigation width without obstacles will be critical to ensuring safe navigation. Navigation safety fairways will provide this space. Therefore, the final PEIS should continue to require wind developers to avoid building in the proposed fairways and acknowledge the challenges that maritime navigation could otherwise face.

We support Mitigation Measure 32, which has been proposed to coordinate transmission infrastructure between offshore wind projects. This will help reduce the opportunity for accidental anchor strikes of offshore export cables by limiting the number of individual cables and power transmission structures. However, we do request that the final PEIS increase the offshore export cable burial depth to 15 feet and require cable paths to cross navigation channels (including fairways) perpendicularly to reduce both the opportunity for and the severity of accidental anchor strikes. Vessels in emergency situations must be able to safely drop anchor without fear of damaging a power cable. If cables cross navigation channels obliquely, they will be more exposed to the chance of anchor strikes, and if the cables are not buried to an adequate depth, an accidental anchor strike will cause more damage to the exposed cable.

While offshore wind promises environmental and economic benefits, human safety must remain paramount.

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 Schrappe". The signature is fluid and cursive, with a large initial "P" and "S".

Peter Schrappe  
Vice President – Pacific Region