



47 Patricia Drive
Covington, LA 70433

PHONE: 985.222.5230
EMAIL: mwright@americanwaterways.com

Mark A. Wright
Vice President – Southern Region

April 17, 2023

Ms. Brandi Canada
U.S. Coast Guard
Eighth Coast Guard District
500 Poydras St
New Orleans, LA 70130

Re: Port Access Route Study: Approaches to
Galveston Bay and Sabine Pass, Texas
and Calcasieu Pass, Louisiana (Docket
No. USCG-2023-0063)

Dear Ms. Canada:

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. Our industry will play a critical role in the construction, maintenance, and operation of U.S. offshore wind installations and we are committed to doing our part to achieve the Administration's goal of generating 30 gigawatts of offshore wind energy by 2030.

AWO members lead the maritime industry in safety, security, and environmental stewardship. We are committed to working with federal and state governments to advance these shared objectives, and AWO members are committed to the goal of zero harm from our industry's operations – to human life, to the environment, and to property. To that end, AWO looks forward to continuing to work with the Coast Guard, other government agencies, and industry stakeholders to minimize safety risks posed by offshore wind energy projects.

On behalf of AWO member companies, thank you for the opportunity to comment on this Port Access Route Study (PARS) in the Gulf of Mexico. Our members support increased development of offshore renewable energy, and we appreciate the Coast Guard's coordination with the Bureau of Ocean Energy Management (BOEM) and the maritime industry to ensure the preservation of existing navigation lanes for safe navigation. It is critical that wind energy projects not produce navigational hazards that put mariners, vessels, or the environment at risk or obstruct the movement of cargo and commodities on which the nation's economy depends. AWO encourages ongoing communication to deconflict wind energy areas, or other ocean developments, with historic towing vessel navigation routes.

In BOEM's Gulf of Mexico Wind Energy Area Memorandum, BOEM states that the Coast Guard has raised the possibility of adding a 2-nautical mile buffer to existing fairways. This is a proposal we support. A buffer of 2 nautical miles on each side of the existing safety fairways in the Gulf of Mexico will improve navigational safety as commercial activity in the area increases. A viable fairway with safety buffers is necessary to accommodate towing vessels transiting in a variety of sea states. It gives vessel operators more time to adhere to the Rules of the Road and react to unforeseen safety incidents. Additionally, existing oil and gas structures and planned aquaculture areas further constrain safe navigation routes in the Gulf of Mexico. Safeguarding these routes and keeping obstructions out of fairway corridors is necessary to keep mariners safe and avoid damage to structures.

Industry stakeholders should be consulted throughout the PARS process. Leveraging industry experience and expertise is critical to understanding the operational realities of vessels navigating the Gulf of Mexico. Additionally, this study should consider not only the current state of vessel traffic in this region, but also the anticipated increase in traffic as vessels constructing and servicing offshore wind also come into operation.

The Biden Administration and numerous states have set ambitious targets for offshore renewable energy generation. Gulf of Mexico wind power development can play a crucial role in meeting those goals and providing economic opportunity for U.S. workers. With recent clarification from Congress and U.S. Customs and Border Protection, the offshore renewable energy market will provide significant opportunities to U.S. mariners, vessel operators, and shipyards. However, navigation safety must be secured so that the maritime transportation system can coexist with offshore wind and other ocean uses.

Thank you again for the opportunity to comment. AWO looks forward to continued engagement during this process in the future.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark A. Wright". The signature is fluid and cursive, with the first letters of each word being capitalized and prominent.

Mark A. Wright
Vice President – Southern Region